

[DNFSB LETTERHEAD]

May 7, 1996

The Honorable Hazel R O'Leary
Secretary of Energy
Washington. D.C. 20585-1000

Dear Secretary O'Leary:

The Defense Nuclear Facilities Safety Board (Board) has reviewed the April 18, 1996, Implementation Plan for our Recommendation 95-2. The Board notes with considerable satisfaction the commitment to reconcile and integrate existing directives and the variety of DOE initiatives that affect safety management. The Board recognizes this to be long overdue; it is no small undertaking. This integration into a consistent whole, together with making safety management planning an integral part of work planning, should go a long way toward correcting major shortcomings in DOE's overall safety management program and increasing DOE's credibility with the public.

The Board accepts this plan, but wishes to stress a number of points in doing so. They are as follows:

1. The plan is based upon a number of assumptions by the Department of Energy (DOE) relative to the current state of various undertakings (Appendix C) that DOE has underway, some initiated by DOE and others by the Board. Acceptance of the plan by the Board does not signify our finding of adequacy of all the products so listed, since any number of them are still the subjects of dialogues between DOE and the Board. For example, the Board has reservations about the practicality of the "necessary and sufficient" process advocated by DOE for requirements identification. This qualification with respect to Appendix C, however, does not preclude an acceptance of the basic action plan offered by DOE as a reasonable way to get underway.
2. The Board notes that, in forwarding this implementation plan, DOE advises that it meets the "intent" of Recommendation 95-2. The Board is in accord that it does that and more, as evidenced by the statement of principles, the objective to make safety planning an integral part of work planning and execution the commitment to safety requirements identification as a key part of the work planning process, the work review and authorization process, and the commitment to organize and staff the resources needed to define expectations and direct the contractors. As such, these actions will result in an embodiment of concepts the Board advocated in our documents, DNFSB/TECH-5 and -6. In light of such accord, the Board will assume, unless otherwise advised, that the issues that led DOE by letter of January 17, 1996 to accept partially the recommendation have been resolved.
3. The Implementation Plan (Commitment 5) deals in a limited way, with organization and staffing of the safety management program envisioned by the 95-2 effort. The Board views the action proposed as modest in scope and the identification of the data base of talent as a first step in the planning for effective deployment of such talent. As

such, the activities described are complementary to the more comprehensive program under way in response to Recommendation 93-3. While accepting this part of the plan it should not be viewed either as an alternative to effective implementation of Recommendation 93-3 or as implying any diminishment of interest of the Board in this matter. The companion effort committed by DOE in response to Recommendation 93-3 must be pursued concurrently and diligently if the requisite numbers of qualified personnel needed to execute the safety management program are to be available at the right places at the right times.

4. The Board envisions the 95-2 program as a three front effort. One is to backfit expeditiously such a safety management structure to the priority facilities and activities that have current operational missions (Commitment 3, page 19); another is to embed such work planning requirements and processes into the budgeting and contractual framework for the conduct of future operational programs so that safety management is an integral part of operations rather than an add-on; and the third is to facilitate transition to safety management programs mandated by law for the cleanup of environmental restoration programs.
5. The Board would have preferred firm dates for delivery of safety management plans for the priority facilities mutually agreed upon under Commitment 3. DOE has committed only to a briefing and a schedule by July 18, 1996. The Board is accepting this "plan for a plan" only with the understanding that expeditious action will be taken. Expeditious to the Board in this case means fulfillment of this commitment within a year at most. The Board reaffirms our previously expressed intent to review these safety management plans as they are developed.
6. While the Board believes the placement of the primary responsibility for safety on line management is exactly right, the Board also believes that maintaining within DOE an effective oversight function, independent of the line, is essential to the success of DOE's safety management program.

The Board believes the cooperative efforts that have marked the development of this implementation plan are to be encouraged and maintained as we jointly proceed toward successful implementation. To that end, we look forward to working with you and the management team reporting to Mr. Grumbly in bringing to fruition such efforts for an improved safety management program.

Sincerely,

John T. Conway
Chairman

c:
The Honorable Thomas P. Grumbly
Mr. Mark Whitaker