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# DEFENSE NUCLEAR FACILITIES SAFETY BOARD

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September 16, 1998

The Honorable Elizabeth A. Moler  
Deputy Secretary of Energy  
Department of Energy  
Washington, DC 20585-0119

Dear Ms. Moler:

The Defense Nuclear Facilities Safety Board (Board) acknowledges your June 3, 1998, letter and report on use of feedback of operating experience to improve the safety of operations which responded to the Board's March 20, 1998, letter. This task required a dedicated effort by the Department of Energy (DOE) and contractor personnel in compiling the information provided. The Board letter noted three main facets to the feedback and improvement process: (1) contractor self-assessment programs, (2) line management assessment programs, and (3) independent oversight. Each plays a vital role in assessing the effectiveness of safety management programs.

The June 3, 1998, report and presentations made to the Board at its June 24, 1998, open public meeting on the subject (transcripts available) reflect a robust program as defined by DOE directives; the implementation of these directives, however, is quite variable. A number of areas for improvement were identified by DOE. In summary, these are as follows:

- "While a wealth of feedback and improvement data is developed and available, this information is not consistently characterized, analyzed, integrated, prioritized, and communicated within DOE."
- "Tracking and follow-up systems are not consistently in place and integrated with site-wide priorities to ensure timely action is taken."
- "Increased use of computerized information systems can provide an effective tool for DOE line management to monitor multiple data streams of assessment and corrective action information."
- "DOE's line oversight of contractor self-assessment programs, clearly required by DOE policy 450.5, needs particular, sustained emphasis by both headquarters and field element managers. Until and unless the data are accurately correlated with the work being performed, DOE cannot truly assess performance."
- "Additionally, lessons learned are not aggressively shared and acted upon within or across sites."

To these with which the Board concurs, the Board would add:

- The large number of directives (at least 30) suggests that a review of them as an integrated system might well lead to a more tightly defined program with expectations for both provider and assessor of data more clearly established.

DOE, in its June 3, 1998, letter identified a set of initiatives for improving feedback and improvement programs. These are to focus on the following:

1. accelerating implementation of DOE Policy 450.5,
2. improving DOE's tracking and follow-up processes,
3. improving DOE's lessons learned processes, and
4. improving implementation of DOE's Functions, Responsibilities, and Authorities Manual.

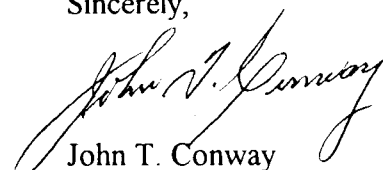
The Board wishes to commend the Department of Energy for these initiatives. The Board will monitor progress of them as a part of our regular status reviews of Recommendation 95-2.

The Board does call your attention, however, to the fact that the current action plan does not address DOE's finding that safety performance data currently "is not consistently characterized, analyzed, integrated, prioritized, and communicated within DOE." It also does not address improvement of the closure process for findings of DOE's independent, Environmental Safety & Health review group (EH-2). The former matter might well be dealt with through review as an integrated whole of the directives pertaining to the subject. The latter will be the subject of separate correspondence by the Board.

During review of the extensive materials provided in response to the Board's March 20, 1998, letter, the Board's staff developed a number of detailed comments including questions about the timing and resource allocation to achieve the path forward. While these comments are not detailed here, the Board's staff stands ready to discuss these matters with the DOE staff as detailed plans and schedules for full implementation of the path forward are finalized.

The Board requests that it be kept currently and fully informed of plans and schedules concerning this path forward as they are developed.

Sincerely,



John T. Conway  
Chairman

- c. Mr. Mark B. Whitaker, Jr.  
Mr. Peter Brush