



Department of Energy
Washington, DC 20585

September 5, 2003

The Honorable John T. Conway
Chairman
Defense Nuclear Facilities Safety Board
625 Indiana Avenue, NW
Suite 700
Washington, D.C. 20004

Dear Mr. Chairman:

This is in response to your letter to me dated August 7, 2003, regarding the Department's proposed revision to the *DOE Handbook: Electrical Safety* (DOE-HDBK-1092-98). We discussed this proposed revision with members of your staff. While these meetings have been beneficial, there remains some concerns as to whether the technical content in the proposed Handbook revision is sufficient to provide clear DOE expectations for electrical safety, including emphasis in areas of importance.

As you acknowledged in your letter, the Electrical Safety Handbook is intended to provide guidance to our contractors. Thus, it can be used as a reference tool or in support of training programs where appropriate. However, as a DOE guidance document, it cannot specify program or contractor requirements that must be followed. While the Handbook does reference and adopts much of the existing Department of Labor, Occupational Safety and Health (OSH) requirements, and national electrical codes and standards, such as the National Electric Code, that are used by our contractors for both DOE and non-DOE work, the Handbook should not be used as a substitute for federal, national industry, or local safety codes and standards. Our contractors are expected to fully know, train and work to these federal requirements, and national (local) codes and standards. In fact, many of our contractors use these requirements and standards, rather than the DOE Handbook, as the foundation of their training programs and basis to meet their contract commitments.

In the Secretary's letter to you dated August 5, 2002, we committed to revise the Electrical Safety Handbook. Specifically we indicated that the "Department is revising the handbook to delete specific references to codes and standards and make the handbook (a) generic reference guide to appropriate codes and standards, (b) a guidance document for effective electrical safety programs, and (c) a document providing guidance for unique DOE work environments not specifically addressed in national consensus standards." We also committed to include a new chapter, "Underground Utilities Detection Equipment During Excavation," as the Board suggested.



However, I do agree that the importance of electrical safety cannot be overstated and there are some unique DOE work environments that may warrant further attention and guidance. To proactively address these unique work environments, we will proceed in the following manner.

1. Issue the current proposed Handbook revision as a DOE guidance document for the criteria of an electrical safety program as required by DOE O 440.1A, Sections 4.k. (5) and (6), and a reference document for all appropriate requirements, codes, and standards. We will work with your staff to finalize this proposed guidance document for its limited purpose. A final guidance document is expected to be completed by October 2003 and submitted for DOE-wide RevCom review. The existing issued Handbook will be maintained as an additional resource but with additional instructions regarding its use when it is inconsistent with national codes and standards.
2. Form a DOE Electrical Safety Group as a Topical Committee under the DOE Technical Standards Program. This committee will be chartered to develop a general framework for DOE electrical safety training programs and any additional requirements or guidance for unique DOE work environments. The committee will be chaired or co-chaired by my office, will coordinate its activities and schedules with your staff, and will verify its products by an independent source as consistent with current codes and standards. This committee will complete its initial review of electrical safety requirements and guidance by February 2004.

Proceeding in this manner will assure that we develop additional guidance where needed, maintain fidelity to current codes and standards, and keep the existing Handbook, DOE-STD-1092-98, available for the present time as an additional resource and the framework for the DOE Electrical Safety Group's activities contemplated in (2) above. We will continue to work with your staff on this important matter.

If you have any questions, please call me at 202-586-6151 or have your staff contact Richard Black at (301) 903-0104.

Sincerely,



Beverly A. Cook
Assistant Secretary
Environment, Safety and Health

cc:

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