



Department of Energy
National Nuclear Security Administration
Washington, DC 20585

July 13, 2004

OFFICE OF THE ADMINISTRATOR

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

Dear Mr. Chairman:

I am responding for Secretary Abraham to your letter of May 14, 2004, regarding the Facility Representative Program in the National Nuclear Security Administration (NNSA). I continue to value the Facility Representative Program and consider it essential to our efforts to ensure the safe operation of our facilities.

I have thoroughly reviewed your letter and agree that action needs to be taken to make this good program stronger. The issues noted in your letter exist in varying degree at most NNSA sites. Accordingly, we will take steps to improve activity-specific hazard training for Facility Representatives and to conduct more rigorous staffing analyses to ensure that our staffing of Facility Representatives is sufficient.

NNSA Headquarters is developing corporate guidance for the identification and conduct of activity-specific hazard training and will promulgate this guidance to our field sites. The objective of the guidance is to ensure that Facility Representatives are aware of and properly trained on significant new hazards or activities they may encounter during the performance of their oversight duties. An initial version of the guidance has been shared with your staff. Based on this guidance, sites will develop formal requirements to accomplish activity-specific hazard training. The sites are expected to complete this action by November 2004.

With regard to Facility Representative staffing levels, we will develop a more rigorous staffing analysis methodology that is based on DOE-STD-1063-2000, *Facility Representatives*, and also incorporates improvements suggested in your letter and discussed at the May 2004 Federal Technical Capability Panel meeting. Improvements include: (1) providing staffing analysis guidance for nuclear facilities that are below hazard category 3 as well as hazardous non-nuclear facilities, and (2) adding a workload analysis step to ensure that the number of Facility Representatives is sufficient given the duties and responsibilities assigned to them. An initial version of the improved staffing analysis methodology has been shared with your staff. Once the staffing methodology is finalized, sites will perform an analysis using this methodology. I anticipate completing this action by October 2004. Additionally, I expect to use this improved staffing analysis



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methodology to provide Facility Representatives recommended staffing levels for the NNSA Staffing Summit, currently expected to occur in the October 2004 timeframe.

I have asked Mr. Emil Morrow, NNSA Federal Technical Capability Agent and Mr. John Evans, DOE Facility Representative Program Manager, to assess the results of the two efforts outlined above for consistent and uniform application at NNSA sites. Based on the results of their assessment, I will direct any further actions, if required. I expect this action will be completed within two months of the sites completing their actions.

One area that accounts for Facility Representative shortages is attrition. NNSA historically averages approximately 15% attrition per year. I have tasked Mr. James Mangeno, my Senior ES&H Advisor, to develop and implement plans for a corporate pipeline for Facility Representatives. This action should be complete by the end of the year.

We appreciate the continued interaction of the Board and its staff regarding the Facility Representative Program. Please contact me should you have any questions on this subject, or have your staff contact Mr. Emil Morrow at 202/586-5530.

Sincerely,

A handwritten signature in black ink, appearing to read "L. F. Brooks", written in a cursive style.

Linton F. Brooks
Administrator