



Department of Energy

Washington, DC 20585

JUN 03 2005

The Honorable A. J. Eggenberger
Acting Chairman
Defense Nuclear Facilities Safety Board
625 Indiana Avenue, NW, Suite 700
Washington, D.C. 20004-2901

Dear Dr. Eggenberger:

This letter provides a status of the Office of Environmental Management (EM) actions to complete Commitment 4.4 of the Department of Energy's (DOE) Implementation Plan for Recommendation 2002-3, *Requirements for the Design, Implementation, and Maintenance of Administrative Controls*. The commitment calls for the submission of a report on training completed and copies of changes to relevant training plans regarding DOE-STD-1186-2004, *Specific Administrative Controls*. On November 4, 2004, the Secretary revised the due date to May 31, 2005, to allow additional time after the issuance of the standard in August 2004. We expect all EM actions under this commitment to be met within 90 days.

EM sites and activities have completed the required initial training, except for one site. The contractor at the Richland Operations Office has initiated training and will complete the training in early June 2005. A summary of the training conducted at EM sites is enclosed. In addition, a compact disc containing the detailed training modules has been provided to your staff.

EM sites are using a variety of means to institutionalize DOE STD-1186-2004 into the various training programs as shown in the enclosure. These activities are in progress and are to be completed within 90 days.

If you have any further questions, please call me at (202) 586-7709 or Dr. Robert Goldsmith, Acting Deputy Assistant Secretary for Integrated Safety Management and Operations Oversight, at (301) 903-4954.

Sincerely,

Charles E. Anderson
Principal Deputy Assistant Secretary
for Environmental Management

Enclosure



Training for Specific Administrative Controls at EM Sites

Recommendation 2002-3 Implementation Plan Commitment 4.4 requires “completion of initial training for relevant DOE, NNSA, and contractor organization on the material developed under Commitment 4.3 and will ensure that training focus is captured in the appropriate contractor and DOE training programs.”

Deliverables:

- 4.4.1 A report of the training completed
- 4.4.2 Copies of changes to relevant training plans

Current Status:

Carlsbad Field Office (CBFO)

POC: Dr. Chuan-Fu Wu

CBFO is utilizing training developed by Washington TRU Solutions for training of both the contractor and Federal staff. The site is trying to achieve some economy by building on the efforts of Washington Group International at the Savannah River Site. The initial training was given on May 13, 16, and 18, 2005. The employees trained included Federal managers, engineers, safety staff, and field representatives; and contractor managers, engineers, watch staff, and selected operations staff. The training will be institutionalized in June by revising the Waste Isolation Pilot Plant course “OPS-122, Technical Safety Requirements” to include information on Specific Administrative Controls (SAC). OPS-122 is a required course in the qualification path for operations, Waste Handling, and Radiological Control Technicians.

Idaho Operations Office (ID)

POC: Jacquie Carrozza

EM activities at this Office of Nuclear Energy, Science and Technology site have met the requirements of Commitment 4.4. Initial training was conducted on October 7, 2004 (Class #183463), for contractor safety analysis personnel and Federal staff involved in the safety basis review and approval process. On December 2, 2004, and January 20, 2005, training was conducted for Federal staff that did not attend the initial training including safety system oversight personnel, safety and health subject matter experts, DOE-ID management involved in the review and concurrence for approval of safety basis documents, and facility representatives. Training materials developed by the Office of Environment, Safety and Health (EH) were tailored to reflect local controls and lessons learned. Because of contractor transitions, not all affected contractors have been trained at this time. This training was completed in May 2005. Institutionalization of training will be accomplished in June by modifying the contractor’s Qualification Standard 1107 for “Safety Analyst Training” to include the DOE STD-1186. DOE-STD-1186 has been institutionalized for the Federal staff into the DOE-ID Training Qualification Program through the Office/Facility Specific Qualification Standards.

Portsmouth/Paducah Project Office**POC: David Kozlowski**

The Bechtel Jacobs Corporation, in conjunction with its operations at Oak Ridge, tailored the training materials provided by EH for local operations in March 2005. This training was developed into formal training module 29014. Two initial training sessions were given on April 4-5, 2005, to targeted Bechtel Jacobs Corporation (BJC), subcontractor, and Federal personnel. On May 11-12, additional training was provided by televideo to relevant contractor personnel. BJC is in the process of finalizing SAC updates in June to its training modules for Accident Analysis, Control Selection, Documented Safety Analysis Preparation, Facility Hazard Categorization, and Hazard Analysis Application Guide.

Livermore Support Office

Livermore will report through the National Nuclear Security Administration (NNSA) for Commitment 4.4.

Nevada Support Office

Nevada will report through NNSA for Commitment 4.4.

Oak Ridge Office**POC: Jay Mullis**

EM and NNSA staffs at this Office of Science site have combined their efforts for a joint training program. Facility representatives, nuclear safety personnel, safety analysts, and lead reviewers were required to attend the training. Training sessions were run on March 11, 15, 22, and 29 and April 3 and 4. Training was developed in-house from the EH-developed training material by two of the Oak Ridge prime contractors with DOE oversight and involvement. To formally institutionalize the SAC standard, the training guide, 27035 *Controls Selection Application Guide*, has been revised and is in final review. This guide is included in the Qualification Standard relevant BJC safety related positions.

Ohio Field Office (OH)**POC: John Orrison**

The OH facilities are closure sites near the end of their life with limited nuclear hazards remaining. Accordingly, training for the Federal staff and contractor safety staff was performed informally and in-house. It consisted of using the EH prepared materials applied to the limited controls of the OH sites. Since the remaining nuclear facilities are scheduled to go below Hazard Category 3 this year, SAC training is not being institutionalized.

Richland Operations Office (RL)**POC: Mark Jackson**

Federal staff (safety bases analysts and engineering support) were trained in-house from the EH supplied training materials. Additional awareness training will be given to the facility representatives in the upcoming quarter. Fluor Hanford has created a formal training module (number 020212) based on the EH training material with modifications

based on local controls. The contractor at the Richland Operations Office has initiated training and will complete the training the second week of June 2005. Institutionalization will be accomplished by referencing it in the RL approved *FHI Safety Analysis and Risk Assessment Handbook*, which is the methodology to use for SACs. Additionally, Fluor will formally modify individual's training requirements and the Training Implementation Matrix.

Office of River Protection

POC: Dana Bryson

The SAC training course was developed in-house by CH2M Hill from the EH training materials and was designated as module 350905. Forty-one individuals from the Federal and contractor staff were trained, including facility representatives, authorization basis staff, and safety staff. The training module has been added to the CH2M Hill Nuclear Safety and Licensing Engineers list of required training. The local Training Implementation Matrix has been amended through the site ITEM system.

Savannah River Operations Office (SR)

POC: Mark Smith

The SAC training course was developed by Washington Safety Management Solutions LLC as DOE training module ENG039 and Westinghouse Savannah River Company (WSRC) training module EE000448 and was given to DOE-SR Federal and WSRC contractor staff on April 21, 26, and 28 and May 5 and 12, 2005. The training was based on the EH materials with additional Savannah River Site specific information presented. Approximately 24 DOE-SR safety basis reviewers, 36 WSRC safety basis reviewers, and 32 Washington Management Solutions safety analysts were trained during this timeframe. The institutionalization of the training will be accomplished by incorporating DOE STD-1186 into the site Standards Requirements Information Documents during July.