

A.J. Eggenberger, Chairman
Joseph F. Bader
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DEFENSE NUCLEAR FACILITIES SAFETY BOARD

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June 26, 2006

The Honorable Samuel W. Bodman
Secretary of Energy
1000 Independence Avenue, SW
Washington, DC 20585-1000

Dear Secretary Bodman:

The Defense Nuclear Facilities Safety Board (Board) has been informed that the Department of Energy (DOE) is taking steps to realign the DOE Office of Environment, Safety and Health (EH) into a newly created entity. While the Board is not commenting on the proposed reorganization, the Board is concerned that safety functions currently performed by EH could be omitted or transferred to offices without the requisite technical expertise to effectively carry out their new responsibilities. As the Board noted in Recommendation 2004-1, *Oversight of Complex, High-Hazard Nuclear Operations*, even redundant safety functions currently performed by more than one organization must be carefully evaluated to determine if they are providing important defense-in-depth before they are eliminated.

The Board also stated in Recommendation 2004-1, when referring to proposed modifications to DOE and the National Nuclear Security Administration (NNSA) organizational structure, that "The Board needs to be sure that any fundamental reorganization does not degrade nuclear safety, and that the likelihood of a serious accident, facility failure, construction problem, or nuclear incident will not be increased as a result of well-intentioned changes." This also applies to the proposed EH reorganization.

Therefore, if you decide to reorganize in this area, the Board would find it useful to be provided with a crosswalk on where the EH safety responsibilities will reside, the technical capabilities of that office to perform those responsibilities, and any responsibilities that will not be relocated to another office.

Sincerely,

A handwritten signature in black ink, appearing to read "A. J. Eggenberger".

A. J. Eggenberger
Chairman

c: The Honorable Linton Brooks
The Honorable C. Russell H. Shearer
Mr. Mark B. Whitaker, Jr.