



**The Secretary of Energy**  
Washington, DC 20585

January 4, 2007

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

Dear Mr. Chairman:

On December 11, 2002, the Defense Nuclear Facilities Safety Board (Board) issued Recommendation 2002-3, *Requirements for the Design, Implementation, and Maintenance of Administrative Controls*. The Department issued its Implementation Plan for Recommendation 2002-3 on June 26, 2003, establishing a methodology and course of actions to address the identified safety issues. The methodology and course of actions included:

- Review of existing requirements and guidance to determine whether supplemental guidance was needed to address safety-related administrative controls, which are now called specific administrative controls (SACs);
- Issuance of supplemental guidance on SACs and provide training;
- Evaluation of safety basis documents to determine whether existing administrative controls met Department expectations and identification of actions to upgrade controls when necessary;
- Evaluation of field implementation of SACs; and
- Strengthening departmental processes to ensure that SACs are properly designed, implemented, and maintained.

The Department has completed its actions and commitments in the Implementation Plan as identified in the enclosure, and we therefore request formal closure of Recommendation 2002-3.

If you have questions, please contact me or Mr. John J. Nichols, Acting Director of the Office of Nuclear Safety and Environmental Policy, at (301) 903-1018.

Sincerely,

A handwritten signature in black ink that reads "Sam".

Samuel W. Bodman

Enclosure



## 2002-3 Implementation Plan Commitment Tracking Matrix

**November 2006**

Commitment	Description	Completion Date	Comments
4.1	Analyze Existing Requirements and Guidance	7/31/03	Letter sent to Board on 7/31/03.
4.2.1	Develop Nuclear Safety Technical Position	10/29/03	Nuclear Safety Technical Position developed and provided to Board in a letter dated 10/29/03.
4.2.2	Submit Interim Guidance and New Technical Standard	12/31/03	This commitment was completed on 12/31/03 with a letter from EH-1 to Board transmitting draft DOE-STD-XXXX-03, <i>Specific Administrative Controls</i> . By letter dated 12/8/03 to the Secretary, the Board provided an expectation that this new standard be referenced in both DOE-STD-3009 and DOE-STD-3011 to fully complete the commitment. New commitment L04-512 was established 12/31/03 from Assistant Secretary Cook for the remaining action to update the two standards. Final DOE-STD-1186-2004, <i>Specific Administrative Controls</i> , was issued in August 2004. SEE BELOW FOR STATUS OF L04-512.
4.3.1	Develop Training Materials for Contractors	2/5/04	EH-22 developed the training materials on specific administrative controls. Training materials were provided to PSOs in early February 2004 and a letter to the Board was provided on 2/5/04.
4.3.2	Develop Training Materials for Federal Employees	2/5/04	EH-22 developed the training materials on specific administrative controls. Training materials were provided to PSOs in early February 2004 and a letter to the Board was provided on 2/5/04.
4.4.1	Report of Completed Training	EM: 7/29/05 NNSA: 5/26/05	EM: Letter from EM-3 to Board on 7/29/2005 completed this commitment.  NNSA: Letter from NA-10 to Board on 5/26/05 reported that all NNSA sites completed the required initial training and made the appropriate changes to their training plans or programs to include training on DOE-STD-1186-2004.
4.4.2	Copies of Changes to Training Plans	EM: 7/29/05 NNSA: 5/26/05	EM: Letter from EM-3 to Board on 7/29/2005 completed this commitment.  NNSA: Letter from NA-10 to Board on 5/26/05 reported that all NNSA sites completed the required initial training and made the appropriate changes to their training plans or programs to include training on DOE-STD-1186-2004.
4.5.1	Final Report of Safety Basis Reviews	EM: 1/3/05 NNSA: 12/13/05	EM: Summary report to the Secretary signed out on 12/28/04. Safety basis reviews conducted at EM facilities at Savannah River, Hanford, LLNL, Idaho, Nevada, Oak Ridge, and Carlsbad. EM provided a copy to Board on 1/3/05.  NNSA: NNSA summary report to the Secretary and the Board on NNSA's evaluation of SACs based on site reviews. All site reviews of safety basis documents completed.
4.5.2	Schedule for Completion of Corrective Actions from Results of Safety Basis Reviews	EM: 1/3/05 NNSA: 12/13/05	EM: Summary report to the Secretary signed out on 12/28/04. Safety basis reviews conducted at EM facilities at Savannah River, Hanford, LLNL, Idaho, Nevada, Oak Ridge, and Carlsbad. EM provided a copy to Board on 1/3/05.  NNSA: NNSA Summary report to Board identified corrective actions required at NNSA sites and scheduled completion dates consistent with annual site reviews of updated documented safety analyses.

<b>Commitment</b>	<b>Description</b>	<b>Completion Date</b>	<b>Comments</b>
4.6.1	Schedule of Implementation Reviews	EM: 2/2/04 NNSA: 2/3/04 and 4/5/04	EM: EM schedule provided to the Board in a 2/2/04 letter from EM-3 to Chairman Conway.  NNSA: NA-10 letter to Board on 2/3/04 provided schedules except for LANL. NA-10 letter to Board dated 4/5/04 provided LANL schedule.
4.6.2	Final Report Documenting Completion of Field Reviews	EM: 7/28/05 NNSA: 3/16/06	EM: Letter from EM-3 to Board 7/28/05 completed this commitment.  NNSA: NNSA final report on filed implementation noting field reviews are complete.
4.6.3	Schedule of Corrective Actions for Field Review Findings	EM: 7/28/05 NNSA: 3/16/06	EM: Letter from EM-3 to Board 7/28/05 completed this commitment.  NNSA: Corrective actions have been scheduled.
4.7.1	EH Final Effectiveness Review	EH: 1/27/06	EH: EH report sent to Board by Secretary indicated SAC implementation effective, but not yet complete as noted in 4.6.2 above.
4.7.2	Report to Secretary on Effectiveness Review	EH: 12/30/05	EH: EH Report sent to Secretary.
4.8	Revise Safe Harbor Standards	EH: 3/24/06	DOE-STD- 3009 revised incorporating DOE-STD-1186.

### Status of Commitment L04-512

<b>Commitment</b>	<b>Description</b>	<b>Completion Date</b>	<b>Comments</b>
L04-512	Update STD-3009 and STD-3011 for Admin Controls	3/24/06	See 4.8 above. DOE-STD-3011 determined not to require revision since it is incorporated by reference in pertinent part in revised DOE-STD-3009.