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**DEFENSE NUCLEAR FACILITIES
SAFETY BOARD**

Washington, DC 20004-2901



January 25, 2011

The Honorable Daniel B. Poneman
Deputy Secretary of Energy
U. S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585-1000

Dear Deputy Secretary Poneman:

The Defense Nuclear Facilities Safety Board (Board) supports efforts to strengthen and improve the Department of Energy (DOE) directives system under the *DOE 2010 Safety and Security Reform Plan*, as was previously noted in the Board's December 7, 2010, letter. However, the Board is concerned by your December 29, 2010, memorandum, *Expedited Processing of Directives*, and its required actions. Further expediting an already accelerated process of revising directives that are central to oversight and safety at defense nuclear facilities has the potential for inducing systematic flaws or overlooking lessons learned by DOE. The Board believes the process outlined in the *Project Management Plan, DOE 2010 Safety and Security Reform Plan* has worked well to revise, consolidate, cancel, and recertify DOE directives to this point. This process was already accelerated but maintained sufficient rigor to strengthen and improve directives.

The Board's staff has reviewed the most current draft versions of the "expedited" directives, including DOE Order 226.1B, *Implementation of DOE Oversight Policy*, and DOE Order 450.2, *Integrated Safety Management System*, and has provided comments to your staff. Specifically, the Board is concerned that these draft directives, if implemented, may not ensure adequate protection of public health and safety. Therefore pursuant to 42 U.S.C. § 2286b(d), the Board requests a report and a briefing within 30 days of receipt of this letter explaining (1) the anticipated improvements to public and worker safety resulting from the "expedited" review process, and (2) the resolution of the staff's comments on DOE Orders 226.1B and 450.2.

Sincerely,

Peter S. Winokur, Ph.D.
Chairman

c: Mrs. Mari-Jo Campagnone