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**DEFENSE NUCLEAR FACILITIES  
SAFETY BOARD**

Washington, DC 20004-2901



February 8, 2016


The Honorable Ernest J. Moniz  
Secretary of Energy  
U.S. Department of Energy  
1000 Independence Avenue, SW  
Washington, DC 20585-1000

Dear Secretary Moniz:

Representatives from the Department of Energy (DOE) provided the first briefing to the Defense Nuclear Facilities Safety Board (Board) on the status of DOE's actions in response to Recommendation 2014-1, *Emergency Preparedness and Response*, on November 23, 2015. Follow-on communications with DOE staff have indicated that DOE is revising the Implementation Plan (IP). The enclosure to this letter details the Board's current concerns and is provided to assist DOE in refining the path ahead.

The Board looks forward to receiving the revised IP and will again review it using our Policy Statement PS-1, *Criteria for Judging the Adequacy of DOE Responses and Implementation Plans for Board Recommendations*. The Board appreciates your prioritization of accomplishing the Recommendation and your dedication to expeditiously improving emergency management. The Board and its staff look forward to continued engagement with DOE to ensure improved emergency management at DOE's defense nuclear facilities.

Sincerely,

  
Joyce L. Connery  
Chairman

Enclosure

c: Mr. Joe Olencz

## Enclosure

### Implementation Plan Concerns:

Recommendation Subsection	Corresponding Implementation Plan (IP) Section
All	<p>Section 6. The IP relies heavily on working groups but it does not specify working group membership or deliverable guidelines nor indicate how the products will flow together to accomplish the Recommendation. Working group tasks in Section 6 of the IP include:</p> <ul style="list-style-type: none"> <li>• Define oversight guidelines</li> <li>• Develop a single Criteria and Review Approach Document (CRAD)</li> <li>• Establish procedures for tracking and closing corrective actions</li> <li>• Determine habitability and equipment reliability criteria</li> <li>• Create guidelines to ensure safe shut-down</li> </ul>
1. Standardize and improve implementation of DOE's criteria and review approach	The IP does not cover how the oversight approach and CRAD deliverables will cover the subsections of sub-Recommendation 1. IP Section 6.1.1 indicates DOE will revise its oversight structure and approach to be risk- and performance-based oversight approach, but concerns remain of this meeting the intent of the Recommendation. The plan for sites to rate their own performance is likely to result in inconsistent ratings.
1.b and 2.c. Training and drill program	The IP does not commit to establishing criteria for training and drill programs and including these in the emergency management directive.
1.d. Identifying deficiencies in emergency preparedness and response	Section 6.1.3. The IP does not specify how a thorough and unbiased assessment of emergency preparedness and response capabilities at defense nuclear facilities is being determined. The Deputy Secretary sent a memorandum to the sites requesting a listing of issues, limited exclusively to open deficiencies. The IP does not include how recurring program issues will be identified, critiqued through common cause analysis, and addressed by corrective actions.

### Deliverables that are past due:

IP Section	Milestone (per IP Section 7)	Deliverable	IP Date
6.1.1.1	Draft Risk Based Oversight Approach	Copy of Approach	10/1/2015
6.1.1.2	Establish training for use of CRAD	CRAD training schedule	11/1/2015
6.1.1.2	Develop CRAD	Draft CRAD	1/4/2016
6.1.2	Draft Revised Corrective Action Procedures	Draft procedures	12/1/2015
6.1.3	Report of Current Deficiencies.	Copy of Report (only a printout of the SharePoint Database has been received)	12/1/2015
6.2.1	Criteria for reliability and habitability	Copy of Report	12/1/2015
6.2.2	Criteria for safe facility shutdown and requirements for testing readiness	Copy of Technical Paper	12/1/2015
6.2.3	Draft of DOE Order 151.1D	Copy of Draft Order	1/4/2016