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DEFENSE NUCLEAR FACILITIES SAFETY BOARD

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October 9, 1990

Honorable James D. Watkins
Secretary of Energy
Washington, DC 20585

Dear Mr. Secretary:

At a meeting on October 3, 1990 between the Board and the DOE Deputy Assistant Secretary for Facilities, the Board expressed concerns regarding the progress and adequacy of efforts on the training of operators at the Rocky Flats Plant necessary for resumption of operations. These concerns have arisen as a result of several site visits since early 1990 in which Board Members, staff, and its experts have visited the Plant to assess operator training. After these visits, DOE and its contractors were apprised, usually in close-out discussions, of Board concerns developed during the visit.

A main concern has been that operator training has not received an appropriate degree of attention from senior line management. There has been a pronounced tendency to regard training as a function that can be implemented by the Performance-Based Training Department acting in isolation. A validated engineering baseline is required for the development of acceptable procedures, which then serve as the basis for operator training and personnel qualifications. This has not yet occurred at Rocky Flats.

An illustration is the contractor's project to verify the operability of vital safety systems. EG&G's Engineering Department has focused its attention on demonstrating that a system operates as designed and supports the safety envelope; but management has apparently not recognized that results of Engineering's operability verification should also be used in procedure development and in training. Likewise, in the Board's assessment, the group developing operating procedures for vital safety systems did not seem to recognize the value of verifying system operability as an aid to procedure development and for subsequent training.

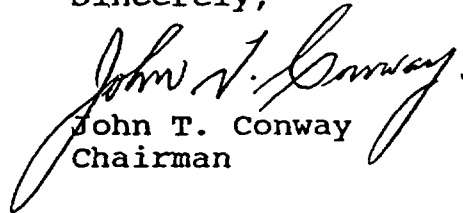
A lack of coordination among several activities which influence training has also been evident. Procedure development in this case demands that the Engineering Department identify the applicable Operational Safety Requirements (OSRs) which apply. Yet the group responsible for writing the procedures was not even aware of the schedule that Engineering was projecting for its

work. Nor had Engineering made this information known to other organizations. Training depends, of course, on valid procedures. Coordination and integration among those organizations whose products are needed to develop procedures have been lacking.

The development of laboratory analytical procedures for Building 559 has been assigned to the Operations Manager. The Board is concerned that he apparently has not been provided with sufficient qualified resources within his own organization to do this job and has not been supported from outside. The Board's impression is that the development of process system procedures for other buildings will be similarly hampered.

In our meeting of October 3, Mr. Stello indicated that he recognized several of these problems and he described certain actions he was undertaking. In identifying these concerns the Board recognizes that improvements in training at the Rocky Flats Plant may have been effected by these actions. Board Members accompanied by our experts in training will be visiting Rocky Flats during the week of October 15, 1990 to make a further assessment of the status of training there and to lay the basis for any further Board actions.

Sincerely,



John T. Conway
Chairman