

[SOE LETTERHEAD]

August 15, 1991

The Honorable John T. Conway
Chairman
Defense Nuclear Facilities Safety Board
625 Indiana Avenue, N.W.
Suite 700
Washington, D.C. 20004

Dear Mr. Conway:

Your letter of March 7, 1991, forwarded the Defense Nuclear Facilities Safety Board Recommendation 91-1 on strengthening the nuclear safety standards program for Department of Energy's (DOE) defense nuclear facilities. My letter to you of May 13, 1991, provided the DOE response to each of the issues raised in Recommendation 91-1 and accepted the Board's recommendation.

The DOE response committed to providing an implementation plan to the Board describing the Department's overall approach to develop and implement standards throughout the DOE complex. The implementation plan is enclosed.

This implementation plan describes the study the DOE will undertake in response to Recommendation 91-1. Specifically, the Department will conduct a critical evaluation of the development and implementation of DOE nuclear safety standards and based on the results of that study will develop an action plan to further strengthen the DOE standards program.

Sincerely,

James D. Watkins
Admiral, U.S. Navy (Retired)

Enclosure

IMPLEMENTATION PLAN FOR BOARD RECOMMENDATION 91-1
THE DEVELOPMENT OF AN ACTION PLAN TO STRENGTHEN DOE STANDARDS

On March 7, 1991, the Defense Nuclear Facilities Safety Board (Board) issued Recommendation 91-1 on strengthening the nuclear safety standards program for the Department of Energy's (DOE's) defense nuclear facilities. On May 13, 1991, DOE responded to each issue raised by the Board, accepting the Board's recommendation. The DOE response committed to provide an implementation plan to the Board which will:

Describe the overall approach to develop and implement standards throughout the DOE complex;

Specify the Department's actions to reexamine critically its existing infrastructure for standards development and implementation at Headquarters to determine if organizational or managerial changes are needed;

Specify the Department's actions for assessing DOE Field Offices and contractor organizations to determine if changes should be made to reflect improvements at Headquarters; and

Describe the program to revise the DOE safety directives compatible with the findings and conclusions of the MITRE Report.

This implementation plan describes a critical examination of the development and implementation of standards at DOE that the Department shall undertake in developing an action plan to further strengthen the DOE standards program. The critical evaluation of the development and implementation of DOE nuclear safety standards will:

Examine the resources committed by the Department to nuclear safety standards development and implementation, including the qualifications, background, organizational distribution, and numbers of management and technical personnel;

Examine the existing infrastructure at both Headquarters and in the field for nuclear safety standards development and implementation; and

Critically review the findings and conclusions of the MITRE report sponsored by the Board regarding deficiencies in the existing DOE Orders system.

Based upon this critical examination of the DOE standards development and implementation processes, an action plan will be developed to further strengthen the DOE standards program. This action plan will identify specific commitments and schedules to implement appropriate changes to the processes of developing and implementing standards within the Department.

This study will be conducted by DOE and contractor personnel of various backgrounds to reflect

the diversity of DOE operations and will consist of three major tasks:

1. Critical evaluation of standards development,
2. Critical evaluation of standards implementation, and
3. Recommendations on the development and implementation of standards throughout the DOE complex, and development of an action plan to strengthen the DOE standards program.

Each task is outlined below with the currently projected schedule for completing these tasks and their major subtasks attached.

TASK 1.0: Critical Evaluation of Standards Development

PURPOSE: To determine how the processes (including infrastructure both at Headquarters, field, and contractors; priorities; resources; and qualifications of personnel) are designed to function and how they really function. In addition, the findings and conclusions of both external (including the MITRE Report) and internal assessments of the DOE standards will be examined against the current plans of the Department to revise the DOE safety directives.

DOE will perform a critical evaluation of the process for developing standards, including applicable DOE Orders and regulations, directives, and other requirements. Specifically, DOE will evaluate:

The infrastructure, including the roles and relationships among the standards developers, line managers, and DOE administration as well as those between Headquarters, the Field Offices, and the contractors;

The review and approval process for standards developed at Headquarters, Field Offices, and contractor organizations;

The identification of requirements to be developed by Headquarters and the Field Offices;

The priorities for standards development;

The schedule for standards development; and

The resources for standards development at Headquarters, the Field Offices, and contractors including the qualifications, background, organizational distribution, and numbers of management and technical personnel developing standards.

In addition, DOE will perform a critical evaluation of the findings and conclusions of both external (including the MITRE Report) and internal assessments of the DOE standards against the

current plans of the Department to revise the DOE safety directives.

TASK 2.0: Critical Evaluation of Standards Implementation

PURPOSE: To develop a critical evaluation of standards implementation by looking at the implementation of DOE standards including applicable DOE Orders and regulations, directives, and other requirements by Program Secretarial Officers (PSOs), the Field Offices, and the contractors at four DOE reactor and non-reactor facilities of varying complexities.

Perform a critical evaluation of the process of implementing standards through a vertical slice of DOE standards, including applicable DOE Orders and regulations, directives, and other requirements. specifically, DOE will evaluate:

The infrastructure, including the roles and relationships among the standards implementers, line managers, and DOE administration as well as those between Headquarters, the Field Offices, and the contractors implementing standards;

The identification of requirements to facilitate Field and contractor implementation;

The implementation mechanisms in Headquarters, the Field Offices, and the contractors;

The implementation requirements and guidance contained within the standards;

The priorities for standards implementation;

The schedule and timing for standards implementation; and

The resources for standards implementation at Headquarters, the Field Offices, and contractors including the qualifications, background, organizational distribution, and numbers of management and technical personnel implementing standards.

TASK 3.0: Develop an Action Plan to Strengthen the DOE Standards Program.

PURPOSE: To prepare a comprehensive action plan for the overall approach to develop and implement standards throughout the DOE complex. The action plan will be based on the critical evaluation of standards development and implementation.

The action plan will:

Discuss where the infrastructure for standards development and implementation could be modified to emphasize the priority and importance of standards to ensure nuclear safety, expand the program to ensure rapid development of standards, and streamline the DOE review and approval process for standards;

Discuss whether Field Offices and contractor infrastructure, responsibilities and resources would also benefit from changes to reflect improvements at Headquarters which strengthen and expedite standards development and implementation; and

Evaluate and adapt, where appropriate, alternatives to the DOE standards development process including consideration of the NRC and other (e.g., FAA) standards development processes.

The schedule for completing these tasks and developing this action plan are provided in the attachment.