

[DNFSB LETTERHEAD]

January 15, 1993

The Honorable James D. Watkins
Secretary of Energy
Washington, D.C. 20585

Dear Mr. Secretary:

The Board has reviewed the Department's Recommendation 92-2 Implementation Plan, and will consider it acceptable provided the conditions delineated below are included.

First, DNFSB Policy Statement No. 1: Criteria for Judging the Adequacy of DOE Responses and Implementation Plans, 55 Federal Register 43398 (October 29, 1990), states that the purpose of the Implementation Plan is to "... present the details of how and when the recommendation will be met." In the case of Recommendation 92-2, the Implementation Plan states, "...the Department will develop an Action Plan that identifies specific commitments and schedules to quickly implement improvements in DOE Facility Representative programs." Therefore, this Action Plan will be reviewed for acceptance by the Board. The Board expects the Action Plan to include, at a minimum, all of the elements outlined in Attachment 1 to this letter.

Second, the Implementation Plan states, "In order to limit the impact on personnel and management resources, it is expected that the majority of the Facility Representative program will be implemented using existing Field Office resources that are restructured, as required, to support a more structured Facility Representative program." This DOE expectation includes an implicit limitation that restricts unduly the manpower pool from which facility representatives will be drawn. At this formative stage, imposing such a barrier could conceivably prevent the establishment of an effective DOE Facility Representative program. The Board expects that personnel selection for the program will be based upon identifiable qualities and attributes that indicate an ability to successfully complete qualification and perform effectively on the job, regardless of whether such persons are in the field, at Headquarters, or drawn from the outside.

Attachment 1

Elements to be Included in the Recommendation 92-2 Action Plan

The Action Plan will be reviewed to ensure it contains a specific schedule detailing when all elements of the recommendation will be met. The Board expects the Action Plan to include (1) firm commitment dates by which qualified DOE Facility Representatives will be in place and performing with measurable effect at several defense nuclear facilities as selected by the Department, and (2) a schedule for implementation at the balance of the defense nuclear facilities.

The Board will also review the Action Plan to ensure the details of how the Recommendation (and therefore the Facility Representative Program) will be implemented, particularly in the following four areas:

- a. DOE Personnel Practices and Procedures. Paragraphs 1.b.(6) and 2.a of Recommendation 92-2 specifically identified DOE personnel practices, procedures and programs as an area requiring attention. As stated in the Office of Nuclear Safety Policy and Standards May 1992 Training Document for DOE Order 5700.6C, Quality Assurance, "... producers of goods and services have been forced to reexamine their approach to managing their operations." In light of this, changes may be required at the DOE Headquarters level, including recruitment practices, definition of career paths, and compensation and recognition policies to achieve an effective Facility Representative program.
- b. Facility Representative Selection and Training. Paragraphs 1.b.(1), 1.b.(2), 2.b.(1), and 2.b.(2) of Recommendation 92-2 discussed the selection and training of Facility Representatives. Accordingly, the Board will review the Action Plan to ensure the following elements of the training and qualification process are included:
 - (1) Identification of candidates with the qualities and attributes to complete the program;
 - (2) the training sequence (e.g., initial fundamentals training, site specific training, facility specific training);
 - (3) Assignment;
 - (4) Qualification; and
 - (5) Continuing training with requalification.

The Board expects that Facility Representatives will be trained to the level of the "Manager" category as defined in DOE Order 5480.20, Personnel Selection, Qualification, Training, and Staffing Requirements at DOE Reactor and Non-Reactor Facilities. The Board further expects that the training sequence will satisfy DOE Order 5700.6C,

Criterion 2, Personnel Training and Qualification, and meet the requirements contained in DOE Order 5480.20, including "...written and oral examinations" [emphasis added].

- c. Incumbent Facility Representatives. Recommendation 92-2 (n.b. page 1, P 5) was predicated on the Board's observations that existing Facility Representative programs at defense nuclear facilities required improvement. Therefore, the Board anticipates that the majority of incumbent DOE Facility Representatives will achieve formal qualification under the Department's new Facility Representative standard. Accordingly, the Action Plan will be expected to describe the Department's process for identifying those elements of the recruitment, training and qualification sequence that will be fulfilled by incumbent Facility Representatives.

- d. Remedial Training. As the Department raises the standards of performance expected of its Facility Representatives, it is likely that some individuals will not satisfactorily complete all aspects of the training and qualification sequence. This situation may involve incumbent Facility Representatives as well as new recruits. (Some incumbents, conceivably, may not even meet the initial screening requirements for new recruits.) Therefore, the Board expects the Action Plan to identify what actions will be taken to remediate initial failures, and to replace those individuals for whom remedial training is ineffective. Of particular import are those actions to be taken in the event an incumbent fails after remedial training, including expeditiously installing an individual that has qualified in accordance with the proposed Facility Representative standard.