September 24, 1993

The Honorable Hazel R. O'Leary  
Secretary of Energy  
Washington, DC 20585

Dear Secretary O'Leary:

Included in the U.S. Senate Report that accompanied the legislation that established the Board is the instruction "The Board is expected to raise the technical expertise of the Department substantially ...".

In the interval since its inception, the Board and its staff have conducted numerous visits to DOE defense nuclear facilities. A primary focus of these visits was to assess the technical competence of personnel, both federal and contractor. Observations during these visits have led the Board to focus considerable attention on DOE's need to improve the selection, training, and qualification of personnel associated with the defense nuclear facilities, especially the weapons complex, on the premise that properly trained and qualified personnel are essential for the protection of public health and safety. The Board has made eight sets of Recommendations since 1989 which address selection, training, and qualification problems, and transmitted a number of staff trip reports on the subject; three of the most recent trip reports are enclosed.

DOE initiated improvements to policies and standards governing selection, training, and qualification of defense nuclear facilities personnel in 1990 and 1991. Some of these upgrades were covered in DOE's Implementation Plan for Recommendation 90-1 and DOE Order 5480.20, Personnel Selection, Qualification, Training, and Staffing at DOE Reactor and Non-Reactor Nuclear Facilities. These improvements and others placing greater emphasis upon safety objectives and formalized conduct of operations constituted a major change in the framework by which DOE facilities are to be operated. However, bringing about changes of this magnitude is difficult and requires consistent, strong leadership at the senior levels.
Some successful facility training and qualification programs have been developed. For example, significant safety improvements and pre-operational testing were completed at the K-Reactor at the Savannah River Site and at the laboratory facility (Building 559) at the Rocky Flats Plant before resumption of operation; both of these restarts followed successful upgrades to training and qualification practices. More recently, the Board staff has found that the management of the RTF facility at Savannah River has also put in place an effective personnel qualification and training program. However, recent trips to certain other areas including the Savannah River Site F-Area, the Defense Waste Processing Facility, and the Oak Ridge Y-12 Plant reveal continuing, systemic problems in implementing Departmental Orders for selection, training, and qualification. Moreover, key planning and implementation documents for training have not been approved for most facilities more than two years after submission was required.

The Board is concerned over what appears to be considerable disparity among sites and facilities in the importance and priority accorded this aspect of safety assurance. Where line managers have taken strong initiatives, definite improvements have resulted. Unfortunately, there is also evidence that some line managers, both DOE and contractor, appear to be willing to accept a lower level of knowledge, understanding, and competency of operating staff than that which would result from more fully complying with DOE Orders.

It appears that Board pressures on restart of existing facilities and start-ups of new facilities provide more impetus for qualification and training programs than is generated by field office and contractor management. The Board much prefers that progress in this area come from the actions of senior DOE and contractor managers who have embraced the requirements and practices defined in DOE Orders and committed themselves to effecting sound training and qualification programs commensurate with the risk of nuclear facility operation.

The Board cannot stress too much the important role that well-qualified and trained personnel play in providing both the public and workers with reasonable assurance of no undue risk to health and safety.

The Board believes that your continued direct interest and leadership are required to ensure:

1. the commitment of your managers, supervisors, and operators to the concept that the selection, training, and qualification requirements delineated in DOE orders and standards are essential to the assurance of safe operation of the DOE defense nuclear weapons complex and

2. the structuring and implementation of timely, effective programs for bringing to fulfillment the objective for upgrading of capabilities of personnel in the complex.
Board recommendations 92-2, 92-7 and 93-3 all relate to the issue of upgrades in the qualification and training of personnel with safety-related responsibilities within the DOE defense nuclear facility complex. The Board will look to the implementation plans responsive to these recommendations for results of your consideration of the observations made herein.

Sincerely,

John T. Conway
Chairman

3 Enclosures

c: M. Whitaker, Acting EH-6