



Department of Energy

Washington, DC 20585

OCT 11 1995

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

Dear Chairman Conway:

In April 1995, you provided a letter outlining the Board's concerns regarding the inadequacies in the emergency response program at the Rocky Flats Environmental Technology Site (RFETS), including a report on unsatisfactory performance witnessed by Board staff during the March 29, 1995, "Ready-94" emergency exercise. You also indicated that the Board was concerned about the lack of effective closure of deficiencies from prior emergency exercises and asked what we were doing to improve methods for satisfactory closure. The following information is provided to respond to your concerns, as well as those expressed in your October 6, 1995 letter about our delays in responding to your April 1995 request.

Performance by the operating contractor, EG&G, during "Ready-94" was disappointing and was judged unsatisfactory by the Rocky Flats Field Office (RFFO), Board staff and other observers. As you correctly pointed out, inadequacies from the prior year's exercise, "Ready 93," were evident during this year's exercise. The RFFO evaluation of the exercise found many of the same inadequacies identified by the Board's observers. These findings are detailed in the enclosed "Final Department of Energy RFFO Evaluation of Ready-94." Many of the issues identified indicate inadequate training in effective response procedures. The overall poor performance indicated a need for increased drills to exercise all facets of the RFETS Emergency Response Organization (ERO).

Corrective actions for "Ready-94" have been initiated including training sessions, tabletop discussions and field drills for the Incident Command Organization (ICO). Ten field drills were conducted in May 1995, and June 1995, to address problems observed during "Ready-94." Results from additional sitewide drills conducted on June 7, 1995, and on June 22, 1995, and actual emergency response to a hydrochloric acid spill on June 14, 1995, indicate significant improvements to response and hazard mitigation. Also, the



evaluation of the latest sitewide drill, conducted on September 19, 1995, showed improvement in the deficiency areas.

The Department's Office of Emergency Management also evaluated the performance of RFETS in "Ready-94." Their report of May 25, 1995, concurred with the majority of the Board's conclusions. They subsequently performed a technical assist appraisal for RFETS from June 19 to June 23, 1995, which included the June 22 sitewide drill for the new Kaiser-Hill emergency response organization. Though the scope and objectives of this drill were different, it did demonstrate improvements in several areas criticized in "Ready-94." The Headquarters Office of Emergency Management will evaluate the next annual sitewide drill and will provide their findings to you.

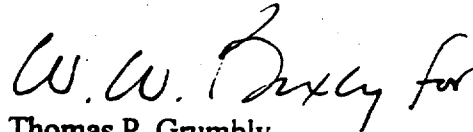
While significant improvement has been made, there is still a lack of discipline within the ICO that reduces the effectiveness of the response program. Routine tabletop exercises and field drills will be conducted on a recurring basis to assure satisfactory resolution of emergency response program deficiencies. These drills will be expanded to include multi-point failure scenarios, providing experience in more realistic emergencies. A review of the qualification program for personnel filling ERO positions will be completed and additional training will be conducted. This activity is essential in light of the transition to the new integrating contractor, Kaiser-Hill.

As indicated above, the preferred approach to ensuring satisfactory closure of weaknesses and deficiencies disclosed in drills and exercises is through the conduct of additional drills. Drills have both training and evaluation objectives and will be selected to specifically challenge the participants. Critical evaluation of performance will address prior findings of inadequacy and identify additional opportunities for improvement. Contractor performance will be monitored by the RFFO Nuclear Safety and Emergency Preparedness Division. Appropriate performance objectives and performance measures will be added to the Kaiser-Hill contract to improve performance as necessary.

In response to your October 6, 1995 letter, the cause of the delay in responding to your April 1995 letter is due, in part, to an ineffective, cumbersome management process that precluded a timely evaluation and response to your concerns. This is an area of major concern to me. I have taken steps in our recent EM reorganization to focus our attention on Defense Board matters and commitments by creating the new Office of Safety and Health led by John Tseng. The reorganization, while improving our entire EM management process, will help strengthen our focus on the technical safety and health issues confronting EM.

I apologize for the delay in responding to your concerns. We will continue to monitor emergency response program performance, and work towards an effective emergency response capability. As always, we invite you and your staff to review our progress in this area.

Sincerely,

Handwritten signature in cursive script, appearing to read "W. W. Grumbly for".

Thomas P. Grumbly
Assistant Secretary for
Environmental Management

Enclosure