



Department of Energy
Germantown, MD 20874-1290

February 26, 1996

Mr. Farid Bamdad
Defense Nuclear Facilities Safety Board
625 Indiana Ave., N.W.
Suite 700
Washington, D.C. 20004

Dear Mr. Bamdad:

In our phone conversation of February 16, 1996, you expressed interest in receiving a copy of a draft guide that the Non-Nuclear Hazards Analysis Team has been working on that provides general guidance for the development and maintenance of a hazards analysis process that identifies and control hazards. Revision F of the guide is attached. Please understand that this is a work-in-process and is by no means complete nor are all team members satisfied with the current revision. However, it will give you an idea of what we are trying to accomplish.

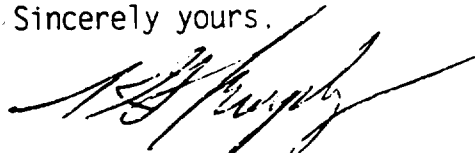
The team does not have an easy task. We do not have a clean slate on which to develop an ideal approach to hazards analysis and control. We have to account for the existing nuclear hazards analysis methodology that is tied closely to the Safety Analysis Report requirements while at the same time try to integrate into our thinking the experiences and methods used by industry, with special emphasis on the process safety management initiative of the chemical industry. In addition, the approach must be effective for the broad range of DOE non-nuclear activities which effectively eliminates the use of a single, one-size-fits-all prescriptive approach. You will see that we have developed a *process guide* that focusses on process as opposed to defining a single, prescriptive approach. This is in the spirit of performance based-approaches used in newer regulations such as the OSHA's Process Safety Management Rule (29 CFR 1910.119).

We would be very interested in your views and comments on the guide and how it fits into the larger picture of DOE's ES&H management. In regards to our conversation about the regulatory driver for non-nuclear facility hazard analysis, you had expressed concerns related to the withdrawal of 5481.1B. My understanding is that the withdrawal was a mistake and that it will be reinstated. As concerns possible future clarifications and improvements



concerning hazards analysis and control requirements there is a segment of the DOE staff that believes an overarching ES&H Management Order applicable to all DOE facilities would be helpful. Darrell Huff of EH-34 has on a number of occasions put forth strawmen drafts for such an overarching order, attached is his latest attempt (draft DOE 5480.MH).

Sincerely yours,



Kenneth G. Murphy
Chemical Safety Team Leader
Office of Field Support

Attachments

cc:

Joseph Fitzgerald, EH-5
Robert Barber, EH-53
Richard Black, EH-31
Mark Whitaker, EH-9
Darrell Huff, EH-34