



## Department of Energy

Washington, DC 20585

March 12, 1996

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:

This is in response to your letter of October 4, 1995, which requested a revision to the Implementation Plan for Recommendation 93-4 and a reconciliation of several Departmental efforts related to defining environmental, health, and safety roles and responsibilities.

In light of your Recommendation 95-2, Safety Management, of October 11, 1995, there is an opportunity to review the tenets of the Technical Management Plan for inclusion in a Department-wide safety management program. The two requests made in your letter of October 4, 1995, are being addressed in the Implementation Plan for Recommendation 95-2 and in the Functions, Assignments, and Responsibilities Manual update under the Recommendation 94-5 Implementation Plan. The efforts in response to the two requests are part of the basis for the development of a Department-wide standards-based safety management plan. As you know, Environmental Management embraced the Technical Management Plan concept at our two Environmental Restoration Management Contractor sites, as committed in the Recommendation 93-4 Implementation Plan.

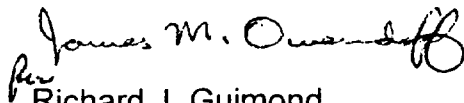
We feel this resolution of your October 4, 1995, letter, as opposed to further clarification or revision of the Recommendation 93-4 Implementation Plan, to be the best way to re-evaluate the application of the tenets of the generic Technical Management Plan across the entire Department.



Enclosed is the ninth quarterly status report for the Recommendation 93-4 Implementation Plan. The final commitment in the Recommendation 93-4 Implementation Plan regarding the delivery of the draft revision of the Richland Technical Management Plan to the Board was completed on November 30, 1995. Therefore, all commitments under Recommendation 93-4 are complete, and we propose closure of this recommendation.

If you have any questions or would like to discuss this letter, please feel free to call me.

Sincerely,

A handwritten signature in cursive script that reads "James M. Owenduff". To the left of the signature, there is a small handwritten word "Per" written vertically.

Richard J. Guimond  
Assistant Surgeon General, USPHS  
Principal Deputy Assistant Secretary  
for Environmental Management

Enclosure

## ACTION TRACKING DNFSB RECOMMENDATION 93-4

Item Number	Description	Deliverable	Milestone	Assignee	Status
934.IP.1	Prepare Draft Implementation Plan	Draft Implementation Plan	September 30, 1993	Susan Peterman 513-865-3982	Completed.
934.IP.2	EM Provide Draft Implementation Plan to DNFSB	Implementation Plan	September 30, 1993	Dave Kozlowski	Completed.
934.IP.3	DNFSB Staff Comments on Implementation Plan		October 15, 1993	DNFSB	Completed.
934.IP.4	Begin concurrence process		October 22, 1993	Dave Kozlowski	Completed.
934.IP.5	Submit IP to Executive Secretary for Secretary's signature		October 29, 1993	Dave Kozlowski	Completed.
934.IP.6	Submit IP to Board		November 5, 1993	Dave Kozlowski	Completed.

Item Number	Description	Deliverable	Milestone	Assignee	Status
934.A.2.(1)	A Technical Management Plan will be developed for Fernald	Technical Management Plan for Fernald	December 18, 1993	Susan Peterman 513-865-3982	Completed. Revised Fernald TMP was submitted as an enclosure to the third quarterly report.
934.A.2.(1).a	Reviewing the Environmental Restoration Program, EM-40 Management Plan (DOE/EM/RM/02) and Project Management Plan outline from DOE Order 4700.1 Project Management System to develop model for Technical Management Plan		November 15, 1993	Susan Peterman 513-865-3982	Completed.
934.A.2.(1).b	Establishing an outline of contents for the Technical Management Plan	Outline of Technical Management Plan	November 15, 1993	Susan Peterman 513-865-3982	Completed. Revised outline was accepted by the DNFSB with minor revisions on February 17, 1994.
934.A.2.(1).c	Identifying qualified key personnel at DOE Fernald Field Office and Headquarters for technical direction, monitoring, and oversight of contractor performance for inclusion in the Technical Management Plan including necessary training to meet current performance expectations		December 18, 1993		Completed. The final generic TMP was submitted to the DNFSB on July 5, 1994, and the revised Fernald TMP was submitted as an enclosure to the third quarterly report. These Plans identify the key personnel at both DOE Headquarters and at Fernald.
934.A.2.(2)	A Technical Management Plan for Hanford will be developed	Technical Management Plan for Hanford	New milestone set in the 9th quarterly status report - February 15, 1995 (first submitted January 18, 1994)	Roger Freeburg 509-376-6628	Completed. The original revised Hanford TMP was submitted as an enclosure to the third quarterly report. An updated Richland TMP was delivered to the DNFSB on November 30, 1995 as a draft.

Item Number	Description	Deliverable	Milestone	Assignee	Status
934.A.2.(3)	Assess initial compliance of Fernald with the Technical Management Plan; and develop corrective action/implementation plan including schedule, as required	Submit documented results of assessment	September 30, 1994. (date changed in April 1994 status report)	Team	Completed. The initial compliance assessment of the Fernald Area Office TMP was conducted October 20-21, 1994. The final report for the assessment was completed and submitted to FN on November 8, 1994. A copy of the assessment report is included as an enclosure to the fifth DNFSB Recommendation 93-4 IP quarterly status report.
934.A.2.(4)	A generic Technical Management Plan will be developed for future contracts	Generic Technical Management Plan	December 18, 1993	EM-424/Dave Kozlowski	Completed. The final generic TMP was submitted to the DNFSB on July 5, 1994.
934.A.2.(5)	Interface with and provide input for rewriting of DOE Order 4700.1 Project Management System and with the Secretary's Contract Reform Team to incorporate the requirements for implementation of a technical management plan.		As required.	Mary McCune 301-903-8152	Completed. A copy of the final generic TMP was submitted to the DOE Order 4700.1 Rewrite Committee as well as to the Secretary's Contract Reform Implementation Team in a memorandum from the Acting Deputy Assistant Secretary for Environmental Restoration dated 7/94.
934.C.2.a	Interface with the committees during preparation of the technical management plans.		As required.		
934.C.2.b	Present completed technical management plans to the committees.		January 15, 1994	Mary McCune 301-903-8152	Completed. A copy of the final generic TMP was submitted to the DOE Order 4700.1 Rewrite Committee as well as to the Secretary's Contract Reform Implementation Team in a memorandum from the Acting Deputy Assistant Secretary for Environmental Restoration dated 7/94.
934.C.2.c	Work with the committees to incorporate lessons learned from this process into their activities.		As required.	Mary McCune 301-903-8152	Completed. Additional follow-up to this action will be addressed in the response to the Board's October 4, 1995, letter to Tom Grumbly.

Item Number	Description	Deliverable	Milestone	Assignee	Status
934.C.2.d	Copies of committee reports will be provided to the DNFSB.	Contract Reform Team final report  Revised DOE Order 4700.1	December 31, 1993  When Available	Mary McCune 301-903-8152	Completed. Public Draft of the Contract Reform Team Report was issued February 1994, and was transmitted to the DNFSB in a letter dated April 4, 1994 to the Chairman of the DNFSB from the Assistant Secretary for Environmental Management.  Completed. DOE Order 4700.1 was subsumed by the Life Cycle Asset Management (LCAM) Directive. The LCAM Directive has been provided to the DNFSB.
934.D.2.a	EH will complete their review of the Type B Investigation	Comments on Type B Investigation	October 15, 1993	Prakash Conjere 301-903-2443	Completed.
934.D.2.b	the EM-42 Deputy Office Director will lead the independent assessment	Initiate assessment	November 8, 1993	EM-42 Deputy Office Director 301-903-7216	Completed. Initial assessment was conducted the week of December 6, 1993. A follow-up to perform a root cause was completed the week of January 17, 1994.
934.D.2.c	the Fernald site will be assessed on how they are addressing the corrective actions recommended in the Type B Investigation				
934.D.2.d	the assessment and recommendations for Fernald will be documented	Submit assessment	December 18, 1993	EM-42 Deputy Office Director 301-903-7216	Completed. An Interim Assessment Report was transmitted on December 20, 1993. The final assessment report was transmitted to the DNFSB on February 4, 1994.
934.D.2.e	the corrective action plan will be developed and monitored		As required.	Mary McCune 301-903-8152	Completed. A letter closing out this activity was sent to the Chairman of the DNFSB on May 16, 1994.

Item Number	Description	Deliverable	Milestone	Assignee	Status
934.E.2.a	DOE will develop a restart procedure based on revised DOE Order 5480.31 and Operational Readiness Review Standard.	Restart procedure	December 31, 1993	Chris White 513-648-3172	Completed. The Uranyl Nitrate Hexahydrate neutralization project was approved for restart by the Deputy Assistant Secretary for Environmental Management on June 15, 1995. A copy of the final Safety Analysis Report is enclosed with the 7th quarterly status report.
934.E.2.b	Complete a study on tank integrity of UNH tanks and, as appropriate, factor those results into the start-up procedure and schedule.	Tank Integrity Study	March 31, 1994	Chris White 513-648-3172	Completed. The Tank Integrity Study was finalized December 31, 1993. This study was provided informally to the DNFSB staff at their visit to Fernald in February 1994. The Study is also provided along with the April, 1994, quarterly status report as a formal submittal to the Board.
934.E.2.c	Obtain approval by Assistant Secretary for Environmental Restoration and Waste Management for restart of the UNH process	Approval to restart	Upon completion of restart procedure	Chris White 513-648-3172	Completed. The Uranyl Nitrate Hexahydrate neutralization project was approved for restart by the Deputy Assistant Secretary for Environmental Management on June 15, 1995. A copy of the final Safety Analysis Report is enclosed with the 7th quarterly status report.
934.F.2.a	Continue training and implementation of the proposed requirements for the Facility Representative Program as they are developed	Fully qualified Facility Representatives for Fernald	August 15, 1995 (date changed in April 1994 status report)	Dave Kozlowski 513-648-3187	Completed. The Fernald Facility Representative Program Plan was revised and reissued in August 1995. The first Fernald Facility Representative completed training and passed a written exam and oral board in October 1995.
934.F.2.b	Develop procedure for Fernald Facility Representative program and training and qualification	Fernald Facility Representative Program and training and qualification procedure	February 15, 1994	Wally Quaider 513-648-3137	Completed. The Facility Representative Program and training and qualification procedure was finalized and is being transmitted formally to the Chairman of the DNFSB as an enclosure to the April 1994 quarterly status report.
934.G	Submit quarterly status reports	Completed.	Issue 15 days after close of quarter; initial report January 15, 1994	Mary McCune 301-903-8152	Completed.