

1.0 INTRODUCTION

This CAP presents a summary of plans and key actions taken by the DOE-ORO Office and BJC in response to ISM issues cited by the DNFSB letter of October 15, 2001 from Chairman Conway to Under Secretary Card. In that letter, the DNFSB identified areas of concern associated with the development of and adherence to AB, the absence of nuclear safety orders from the M&I Contract WSS, the lack of clear definition and competence to execute roles and responsibilities within both DOE-ORO and BJC, and indications that the ISMS of DOE-ORO and BJC are not functioning, especially in the area of feedback and improvement. Subsequently, the DOE-ORO Manager, on November 1, 2001, revoked the verification of the DOE-ORO and BJC ISMS that had been completed in November 2000.

DOE-ORO and BJC had implemented a number of actions to upgrade the existing EM SB documents for compliance with 10 CFR 830 Subpart B, and to address previously identified SB issues. Following the DNFSB letter, additional actions were undertaken, including several assessments by DOE-HQ, DOE-ORO, and BJC management. The assessments resulted in additional issues and findings, which were utilized to clarify the identification of causal factors.

The DOE-ORO and BJC independent and self-assessments confirmed the DNFSB observations and identified a number of weaknesses in ISMS implementation. In some cases, the issues were common to both the DOE-ORO and BJC organizations. This led DOE-ORO and BJC to establish a joint project team to evaluate the issues, implement any necessary compensatory measures, and begin the corrective action development process. The objective was to ensure that cross-cutting issues were addressed effectively and that process improvements would be complementary.

DOE-ORO assigned the Deputy Manager for Operations and BJC assigned the Vice President and General Manager to lead and integrate the project team. Because the issues readily roll up to the four areas of concern cited by the DNFSB, the project team organized four task teams and initiated corrective action development to align with these issues.

This CAP presents more than 100 corrective actions to address specific issues, findings, and observations cited by the DNFSB, the DOE-HQ Independent SB Assessment, DOE-ORO assessments and BJC self assessments. However, DOE-ORO and BJC have focused the actions collectively to attain an overall objective. DOE-ORO and BJC view the completion of this CAP as an opportunity to realize significant improvements to their respective nuclear safety and ISM programs. The overall objective is to assure the protection of the public, workers, and environment through implementation of technically adequate and 10 CFR 830 Subpart B-compliant SB documents, tailored to current missions and hazards, with an effective, enabling ISMS and supporting SMPs.

The CAP integrates corrective actions identified for both DOE-ORO and BJC. Both organizations have undertaken actions that are interdependent to strengthen programmatic areas and improve processes relative to managing EM nuclear facilities. The CAP is organized as follows:

SECTION 2.0, DETERMINATION OF NATURE AND EXTENT OF CONDITION provides an overview of the various assessments that have been utilized to identify the issues, causal factors, and findings upon which this CAP is based.

SECTION 3.0, ROOT CAUSE ANALYSIS presents the root cause analysis performed by DOE-ORO and BJC. Since the issues are systemic for major program areas, the root cause analysis and ensuing corrective action development have been organized and presented to align with the four principal areas of concern identified in the October 15, 2001 DNFSB letter: SB; DOE Orders of Interest and WSS; Technical Competence; and ISMS Improvements.

SECTION 4.0, DOE-ORO/BJC IMPROVEMENTS PROJECT APPROACH AND CAP DEVELOPMENT describes how the CAP was developed, including organization of DOE-ORO and BJC integrated project teams, and the approach to identifying corrective actions to address the root cause and causal factors

SECTION 5.0, CAP presents a summary of the corrective actions and provides a crosswalk to the DNFSB areas of concern, issues, causal factors, and root causes identified.

SECTION 6.0, PERFORMANCE MONITORING AND IMPROVEMENTS describes the approach to monitoring corrective action closure and the effectiveness of the corrective action implementation.

APPENDICES A, B, and C provide detailed information on each corrective action which will be tracked to closure by DOE-ORO and BJC.