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DEFENSE NUCLEAR FACILITIES SAFETY BOARD

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January 31, 2002

The Honorable Spencer Abraham
Secretary of Energy
1000 Independence Avenue, SW
Washington, DC 20585-1000

Dear Secretary Abraham:

The Defense Nuclear Facilities Safety Board (Board) has reviewed your November 13, 2001, letter proposing the closure of Board Recommendation 98-1, *Resolution of Issues Identified by DOE [Department of Energy] Internal Oversight*. The Board agrees that there have been many constructive steps taken by DOE to establish a disciplined process for responding to the findings of the DOE Independent Oversight Office. The most notable steps are the issuance of a strong policy statement, the modification of controlling directives and rules including specifying a mechanism to resolve disputes between the line and independent oversight, and the development of a Corrective Action Tracking System (CATS) for monitoring progress toward correction of safety issues.

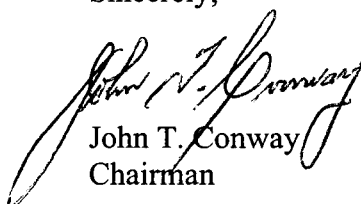
However, in spite of these accomplishments, there is still one area where the Board requires progress before we will consider that DOE has met the full intent of the recommendation. The Implementation Plan required a verification review to confirm that the issue resolution process developed in response to Recommendation 98-1 was fully implemented. The verification team's May 30, 2000, report stated that before the process can be considered fully implemented the "... documentation of roles, responsibilities, authorities and procedures covering the program, particularly at the PSO [Program Secretarial Officer] and field levels, needs to be completed and strengthened in order to ensure that the program will continue to operate as intended"

While the field level Functions, Responsibilities, and Authorities (FRA) documents have been updated, the FRA's for most of the DOE Headquarters (PSO) elements are either out of date or remain unfinished. In particular, the FRA's for the National Nuclear Security Administration, the Office of Independent Oversight and Performance, and the Office of the Assistant Secretary of Environment, Health and Safety do not address the process developed under Recommendation 98-1.

The Board is very aware of the significant organization changes that have occurred in the last 18 months. This only serves to reenforce the need to develop and maintain accurate FRA documents as required by the Integrated Safety Management guiding principle, Clear Roles and Responsibilities, that states "Clear and unambiguous lines of authority and responsibility for ensuring safety shall be established and maintained at all organized levels within the Department and its contractors."

Once the above actions are satisfactorily completed, the Board is prepared to close Recommendation 98-1.

Sincerely,



John T. Conway
Chairman

c: The Honorable Robert Gordon Card
Mr. Mark B. Whitaker, Jr.