



Department of Energy

Washington, DC 20585

June 25, 2002

The Honorable John T. Conway
Chairman
Defense Nuclear Facilities Safety Board
625 Indiana Avenue, NW
Washington, D.C. 20004-2901

Dear Mr. Chairman:

The purpose of this letter is to provide a response to your letter of March 19, 2002, concerning work control and integrated safety management issues at Rocky Flats. Enclosed is a response prepared by the Rocky Flats Field Office and reviewed by my staff. The Rocky Flats Field Office will provide you a briefing on this issue at the end of the summer regarding the effectiveness of actions taken.

If you or your staff have any questions, please contact Paul Golan, Chief Operating Officer for Environmental Management, at (202) 586-7709 or Dr. Robert Goldsmith at (303) 966-7281.

Sincerely,

A handwritten signature in black ink, appearing to read "Jessie Hill Roberson".

Jessie Hill Roberson
Assistant Secretary for
Environmental Management

Enclosure



United States Government

Department of Energy
Rocky Flats Field Office**memorandum**

DATE: JUN 11 2002

REPLY TO:
ATTN OF: OOM:AMSP:RG:02-00770

SUBJECT: Response to March 19, 2002, Letter from the Defense Nuclear Facilities Safety Board

TO: Jessie Hill Roberson, Assistant Secretary for Environmental Management, EM-1

This memorandum responds to the March 19, 2002, letter from the Defense Nuclear Facilities Safety Board (DNFSB) to you. The letter requested delineation of actions to improve the Rocky Flats Environmental Technology Site's (RFETS) response to annual Integrated Safety Management (ISM) update reviews, as well as actions to address certain DNFSB staff observations. These actions comprise four areas, namely:

- 1) Improving response to ISM update reviews
- 2) Mentoring of work planning personnel
- 3) Enhancing Rocky Flats Field Office (RFFO) oversight of work planning
- 4) Determining underlying cause of occurrences, so that appropriate corrective actions can be developed and implemented

Following are the specific actions taken or planned by RFETS, as well as specific products of these actions:

1) Improving Response to ISM Update Reviews

The RFFO has failed to appropriately respond to the February, 2001, ISM assessment. This assessment identified seven critical findings; of which two were assigned to the RFFO to correct and five to Kaiser-Hill Company, L.L.C. (K-H), to correct. K-H has completed 85 of 89 actions associated with their five findings, and the RFFO has verified 84. The RFFO has completed only 5 of 19 actions associated with its two findings. These RFFO actions are months overdue because there was no system to track them and, thereby, apply appropriate management attention to ensure timely completion, verification and closure. These deficiencies will be corrected using a formal tracking system for the RFFO actions, combined with enhanced management attention to timely closeout of the RFFO and K-H actions. Corrective actions for future findings will be entered into the tracking system within a month of issuance of the formal review report. The Field Office Manager will be briefed monthly on the progress of completion of the RFFO and K-H actions.

2) Mentoring of Work Planning Personnel

In April 2002, the RFETS started a mentoring pilot program in the 371 Project to better ensure that work scope is properly defined, hazards are identified and appropriate safety controls are incorporated into work instructions. The program focuses on non-routine work and hazardous decontamination and decommissioning activities. Based on lessons learned in the Conduct of Operations mentoring pilot program, the mentors are experienced, senior-level personnel who are assigned on a weekly basis. They focus their efforts on the walk-down phase, Job Hazard Analysis development and work control document review, and document these efforts to ensure that lessons learned are captured.

- The pilot program will be completed by July 31, 2002, and implemented site-wide by August 31, 2002.
- The K-H Chief Operating Officer's (COO) memo on site-wide mentoring will be updated by July 31, 2002, to reflect the expectations and specific guidance regarding work planning mentoring, and to correct the examples of work planning mentoring that were disseminated previously.
- The RFETS Safety Continuous Improvement Plan (SCIP) will be updated by July 15, 2002, to reflect lessons learned from the Conduct of Operations mentoring pilot program into the work planning mentoring pilot program.
- The effectiveness of the program will be determined by tracking the frequency of work planning deficiencies as a causal factor in significant occurrences. A continuing decreasing trend in problematic work planning will signify success of the program.
- The RFFO and K-H will independently review these mentoring efforts as part of each Quarterly Safety and Health Review, beginning with the next review on July 31, 2002.

3) Work Planning Oversight

The RFFO has taken the following steps to enhance its oversight of activity-level work planning:

- The RFFO has now completed the training of approximately twenty additional RFFO personnel in the review and evaluation of the work planning process.
- From problem areas identified by the Safety Assessment Center, facility representative observations and the RFFO safety program surveillance, the RFFO plan and perform detailed, risk-based work package reviews by assigning them to these personnel such that each major project is covered on a monthly basis.
- In addition, a process is underway to scrutinize a specific activity from planning through the actual building of the work package on a quarterly basis. This oversight considers definition of work scope, identification of hazards and safety controls, and proper incorporation of identified controls into work instructions. The work package is followed through completion of the work to ensure that it provided adequate work instructions and controls for the workers to complete the work safely. There will be monthly follow-up to watch the work being performed and at completion, an effectiveness assessment of how well the package worked.
- Beginning in June 2002, and semi-annually thereafter, the RFFO will perform a comprehensive focused work planning assessment across projects. The focus of the assessments will be determined from compilation and analysis of the information provided by the Safety Assessment Center, facility representative observations and the RFFO safety program surveillance.
- These assessments are reflected in the revised the RFFO integrated assessment schedule.

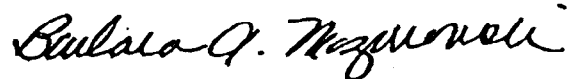
4) Determining Underlying Cause of Occurrences

The RFFO has not systematically applied a rigorous approach to determining underlying cause by examining the adequacy of required procedures and whether those procedures were followed correctly. To alleviate this shortcoming, the following steps have been or will be taken to improve the determination of underlying cause for all occurrences:

- The K-H COO will issue a memo by June 30, 2002, to line managers reiterating the importance of thorough cause determination and the principles of fact-finding which have been incorporated into the RFETS infrastructure documents. The memo will delineate expectations for conducting fact-findings or management investigations, including selection of appropriate fact-finding personnel.

- By June 20, 2002, case studies of recent serious events will be written and disseminated site-wide to exemplify how underlying cause should be determined.
- By August 31, 2002, an analysis process to understand and intervene in the antecedent-behavior-consequence interaction in event causation will be evaluated for implementation, after formal training of the RFFO and K-H personnel is completed this summer. This process will add another dimension to understanding underlying cause.
- The RFFO senior management will reiterate its commitment to fully understand the root cause of occurrences and to ensure that appropriate corrective actions have been taken before allowing work to proceed. In particular, these actions shall address the adequacy of required procedures and ensure that procedures are followed correctly.
- The SCIP will be updated by August 31, 2002, to reflect these actions.

The RFFO will continue to keep you informed of our progress in these areas, and would like to arrange a joint briefing for the DNFSB in the next few months. If you have any questions concerning these actions, please call Dr. Robert Goldsmith, Assistant Manager for Safety Programs, at 303-966-7281.



Barbara A. Mazurowski
Manager

Attachment

cc:
P. Golan, EM-3, HQ
C. Guidice, EM-3, HQ
D. Sargent, DAMSP, RFFO
K. Powers, K-H
R. Kasdorf, DNFSB
D. Owens, DNSFB