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DEFENSE NUCLEAR FACILITIES SAFETY BOARD

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December 8, 2003

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

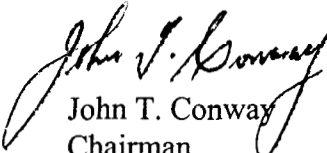
Dear Secretary Abraham:

The Defense Nuclear Facilities Safety Board (Board) has received a letter dated October 29, 2003, from the Assistant Secretary for Environment, Safety and Health, providing the Department of Energy's (DOE) response to Commitment 4.2.1 under the Board's Recommendation 2002-3, *Requirements for the Design, Implementation, and Maintenance of Administrative Controls*. That commitment was to provide a Nuclear Safety Technical Position (NSTP) concerning the development, review, and approval of administrative controls that perform a specific safety function.

The NSTP identifies the existing requirements and guidance in DOE rules and directives that clearly set a high expectation for the quality of administrative controls used to ensure safety. The NSTP also correctly notes that these policy-level expectations do not provide guidance on how to meet these expectations. The Board looks forward to receiving DOE's December deliverable, Commitment 4.2.2, which will provide more detailed and specific guidance on the process for developing, implementing, and maintaining administrative controls in such a way as to meet DOE's quality expectations. The Board understands that DOE intends to incorporate at least some of this information into a new DOE technical standard. The Board wishes to highlight its expectation that the December deliverable will include not only the new draft standard, but also, the proposed modifications of DOE Standard 3009, *Preparation Guide for U.S. DOE Nonreactor Nuclear Facility Safety Analysis Reports*, and DOE Standard 3011, *Guidance for Preparation of Basis for Interim Operation (BIO) Documents*, to reference the new standard. Unless the latter two documents are thus revised, it will not be possible to use the more detailed guidance in the new standard as the basis for field reviews of existing administrative controls, which are scheduled to be conducted later per Commitments 4.5 and 4.6 of the Implementation Plan for Recommendation 2002-3.

The Board is also interested in learning about the details of the effort to develop this important and relatively specialized standard. Accordingly, the Board requests that DOE provide information on the technical qualifications and experience of the personnel involved with this effort.

Sincerely,



John T. Conway
Chairman

c: The Honorable Everet H. Beckner
The Honorable Beverly Ann Cook
The Honorable Jessie Hill Roberson
Mr. Mark B. Whitaker, Jr.