Department of Energy
National Nuclear Security Administration
Washington, DC 20585
October 2, 2003

The Honorable John T. Conway
Chairman
Defense Nuclear Facilities Safety Board
625 Indiana Avenue, NW.
Suite 700
Washington, D.C. 20004-2901

Dear Mr. Chairman:

This is in response to your July 9, 2003, letter requesting Site Offices to report on the scope and periodicity of the training assessments conducted as required by Department of Energy (DOE) Order 5480.20A. Of the seven sites with nuclear facilities, Y-12 Site Office (YSO), Sandia Site Office (SSO), and Savannah River Site Office (SRSO) reported that periodic reviews of training and qualification programs were being conducted in accordance with Order requirements using DOE Standard 1070-94, and the Pantex Site Office (PXSO) has just recently completed a review of 5480.20A using DOE Standard 1070-94. The Los Alamos Site Office (LASO), Nevada Site Office (NSO), and Livermore Site Office (LSO) indicated that they are not in compliance. LASO and LSO plan to conduct the required reviews by the end of June 2004. NSO indicated that they are in the process of implementing procedures and processes for nuclear work including training. NSO indicated that they will be in compliance with 5480.20A in the Device Assembly Facility by the end of 2003, and for the subcritical experiments by the end of 2004.

Several Site Offices reported local resource issues and a common desire to leverage training resources from the National Nuclear Security Administration (NNSA) Service Center to provide assessment support for required DOE Order 5480.20A reviews. We will ensure these resources are provided to achieve compliance with the Order requirements. Individual site responses are included in the enclosure.

We share the Defense Nuclear Facilities Safety Board's (DNFSB) concern regarding NNSA oversight of site-level training programs. We will notify DNFSB upon completion of the reviews of the Los Alamos National Laboratory, Lawrence Livermore National Laboratory, and Nevada Test Site training and qualification program. Corrective actions and implementation schedules provided in the enclosure are intended to resolve the identified issues.

If you have any questions, please call me or have your staff contact Emil Morrow, NNSA Federal Technical Capability Agent at (202) 586-5530.

Sincerely,

Everet H. Beckner
Deputy Administrator
for Defense Programs

Enclosure

cc w/enclosure:
M. Whitaker, DR-1

STATUS OF NNSA TRAINING ASSESSMENTS

The status of the training assessments required by DOE Order 5480.20A at the seven NNSA sites with nuclear facilities is provided as follows:

Los Alamos Site Office (LASO): Not compliant with 5480.20A. The LASO Senior Technical Safety Manager has designated a team to conduct a comprehensive review in accordance with 5480.20A requirements by June 2004, and criteria documents have been developed from DOE Standard 1070-94. The LASO Senior Technical Safety Manager will oversee this process and ensure quality and completeness of this review. LASO plans to place the recurrent requirement to conduct this review on the LASO tracking system by April 2004. LASO expects to be compliant by June 2004, but will work to achieve compliance as early as the end of 2003.

Livermore Site Office (LSO): Not compliant with 5480.20A. LSO has not conducted a comprehensive assessment of compliance with DOE Order 5480.20A requirements. In their corrective action plan, LSO has committed to modifying their Service Level Agreement with the NNSA Service Center by December 3, 2003, to include assessment and continued program support. They will also utilize Service Center subject matter experts to perform reviews of training and qualification programs by May 6, 2004, in order to maintain compliance with DOE Order 5480.20A.

Nevada Site Office (NSO): Partially Compliant with 5480.20A. NSO is currently using the nuclear facility readiness review process specified in DOE Order 425.1B to assess implementation of DOE Order 5480.20A. This process incorporates the requirements of DOE Standard 1070-94. The NSO contractor (Bechtel Nevada) and the Laboratories (LLNL and LANL) have indicated their compliance with DOE Order 5480.20A. The Area 3 and Area 5 Radioactive Waste Management sites, recent successful contractor Operational Readiness Reviews(ORRs) indicated compliance with DOE Order 5480.20A requirements. This was recently validated by the NNSA ORR. LLNL has reported compliance with DOE Order 5480.20A requirements for subcritical experimental activities at U1a and operations at the Device Assembly Facility (DAF). NSO has conducted a limited readiness assessment of the PIANO subcritical experiment that indicated that LLNL was not fully compliant with DOE Order 5480.20A. LLNL will be developing corrective action plans to address the noncompliance issues with the Order. NSO plans to conduct an ORR of the DAF glovebox operation in October 2003 to validate compliance with DOE Order 5480.20A requirements. Also, a Facility Representative Training and Qualifications Assessment was completed in January 2003, that focused on DOE O 5480.20A compliance for all nuclear facilities at the NTS. All findings from this assessment were communicated back to the operating contractors, as well as NSO management. The contractors have developed corrective action plans and schedules for these findings and entered into our local corrective action tracking data base. NSO is undergoing improvements in the area of quality assurance that recently required a Quality Assurance (QA) Assessment of NSO and contractors. During this assessment, personnel training and qualification was reviewed.

The contractor and NSO are developing corrective action plans that deal with the training and qualification findings from the QA assessment. In addition, NSO is negotiating with the NNSA Service Center for necessary subject matter expertise to perform reviews of training and qualification programs.

Sandia Site Office (SSO): Compliant with 5480.20A. SSO utilized the Contractor Performance Assessment Program (CPAP) in August 2002 to review training and qualification in accordance with DOE Order 5480.20A requirements. The eight objectives of DOE Standard 1070-94 formed the basis of the review. There were five observations and one noteworthy practice identified by the review of training and qualification. The results of the CPAP review were communicated to Sandia National Laboratories with the action to develop a corrective action plan to respond to Findings. Prior to the next scheduled review of training and qualification in August 2005, SSO has committed to develop and implement a procedure to guide the review of training and qualification at defense nuclear facilities in accordance with DOE Order 5480.20A and DOE Standard 1070-94. In addition, SSO has created a Service Level Agreement with the NNSA Service Center for necessary subject matter expertise to perform reviews of training and qualification programs.

Y-12 Site Office (YSO): Compliant with 5480.20A. The YSO has a well-defined assessment and oversight program for evaluating contractor training programs. For all Y-12 program areas, compliance with DOE requirements is evaluated and administered through a master assessment plan, which defines the frequency and periodicity of the review of contractor programs. For oversight of the training programs, a formal assessment schedule is also in place and consists of quarterly and monthly assessments, work activity observations, and programmatic reviews. These assessments are documented in formal Individual Assessment Reports (IAR). Any issues are identified as concerns, reviewed and approved by YSO management, and tracked in both the contractor's and YSO's deficiency tracking systems. Each month, YSO management provides feedback to the contractor on the previous month's assessment and oversight activities through a Performance Analysis Matrix (PAM) process. The PAM includes a dedicated section addressing all training-related assessment and observation activities. Based on the scope of these training elements and their significance to safe facility operations, YSO has determined that 18 months is a more appropriate base period of coverage for their site. As contractor performance improves, this base coverage could change up to 3 years as required by the DOE Order. YSO asserts that its programs are in full compliance with DOE Order 5480.20A.

Pantex Site Office (PXSO): Compliant with 5480.20A. The PXSO completed a comprehensive review in accordance with the 5480.20A requirements using DOE Standard 1070-94 in August 2003. The Site Office also intends to perform subsequent tri-annual reviews using Service Center support since the site office does not currently have the resources to perform that review in-house.

Savannah River Site Office (SRSO): Compliant with 5480.20A. NNSA Federal staff have oversight of the tritium contractor training and qualification program. In December 2000, a routine internal assessment of the tritium contractor training program was conducted to validate the program and to determine if the program met the requirements of DOE Standard 1070-94 and DOE Order 5480.20A . NNSA-SRSO is in compliance with DOE Standard 1070-94 and DOE Order 5480.20A. No weaknesses were noted in the program.

NNSA attends Westinghouse Savannah River Corporation (WSRC) Oral Boards and Operator Qualification Walkdowns on a regular basis. At an average, one qualification or requalification is attended every two months. Written comprehensive tests are reviewed, the oral board or facility walkdowns are attended and written up on the Tritium Division Oral Board Evaluation form.

NNSA routinely attends facility drills and evaluates how well operators are trained to respond to facility casualities. Some drills include NNSA personnel and they play in those as required. At least once a year, a large drill event is simulated involving the Emergency Response Operations and DOE personnel.

NNSA reviews WSRC Tiger Team evaluations, validates WSRC Readiness Assessments (RAs) and conducts NNSA RAs for new equipment, systems, or processes which are added to facilities. During these assessments, the Training Deptartment. along with operator training classes and performance based training are evaluated. Training records and qualification cards are verified for completeness. Operational Readiness Reviews (ORRs) are conducted as needed when the order calls for a higher level of approval for the startup of new equipment, systems, or processes. Defense Programs will undergo two RAs and one ORR during CY2003.

NNSA monitors the Training Deptartment. accomplishments on a monthly basis as part of the monthly contractor performance assessment program. This is an opportunity for NNSA to evaluate what new improvements Training has initiated to the program, but also keep up with progress on current and routine activities. NNSA routinely attends WSRC Operator classes and is kept current of all upcoming qualifications and training.

Additionally, the tritium contractor uses Site Procedure Manual 4B "Training and Qualification Program Manual" to implement DOE Order 5480.20A. Below is a list of the assessments that include the Training Program at SRSO Defense Programs. Combined, these items more than meet the tri-annual assessment requirement of the DOE Order.

The Facility Evaluation Board (FEB) is a WSRC Team which conducts extensive assessments of Operations at the Tritium Facilities, including the training program. They determine the effectiveness of the training program and how well the training groups are complying with the Site 4B Training and Qualification Manual and the DOE Directive 5480.20A. The FEB evaluations have been conducted at a maximum of every 2 years. The last FEB evaluation in Defense Programs was in September of 2002. Recent changes to the FEB program now allow them to do assessments in any division at any time, without notice. The FEB assessment

includes all elements of the training program, including analysis, development, implementation and evaluation of training in classroom, on-the-job training, and drills settings. The programmatic side of training is also assessed including qualification tracking. In the final analysis, the Tritium Training Program appeared to be operating well.

The next assessment/review of the Training Program is scheduled to be conducted on or before December 31, 2003.