



Department of Energy

Washington, DC 20585

May 13, 2003

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

Dear Mr. Chairman:

The purpose of this letter is to provide status on the Quality Assurance Improvement Plan (QAIP), and to report completion of deliverables 1.1.2 and 1.2.2. QAIP 1.1.2 required that an Environmental Management (EM) Team review DNFSB 2000-2 Phase I and II assessments and develop recommendations and corrective action plans, as required. Attachment 1 documents the review and actions. QAIP 1.2.2 required development of a schedule for follow-on vital safety system reviews. This has been completed and EM would be happy to review these schedules with your staff.

As the purpose of the QAIP is for continuous improvement of our processes, we will use the results of our assessments to continue to improve our operations and our operational performance. If you have any further questions, please call me or Mr. Paul Golan, Chief Operating Officer, Environmental Management, at (202) 586-0738.

Sincerely,

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

Jessie Hill Roberson
Assistant Secretary for
Environmental Management

Enclosure

cc: Mark Whitaker, DR-1



Improvement Action Items

1.1.2 Deliverable: EM Review Team develops recommendations and Field/Operations Offices submit corrective action plans.

An Environmental Management (EM) Review Team was established to analyze the results of Phase II assessments, corrective plans and other applicable sources for issues that could be crosscutting to environmental management facilities. The Review Team did not recommend that additional corrective action plans be prepared. The Phase II assessments and associated corrective action plans sufficiently addressed the deficiencies noted in the Phase II assessments. The EM Review Team provided the following general observations:

- a) Review of the Vital Safety System (VSS) was not part of some sites' integrated assessment program,
- b) When Phase I assessments were first completed, they did not provide an accurate assessment of the conditions of the VSS (97% green). This was corrected when the assessments were reperformed,
- c) No aggregation of assessment dates to draw higher level conclusions,
- d) The reviews (Phase II assessments and corrective action plans) were credible and the results well documented,
- e) The EM facility safety system reviews were conducted per the approved Criteria and Review Approach Document (CRADS) or a version of the CRADS that was modified to fit the particular needs of the site,
- f) Experienced personnel with engineering and/or plant operations background performed the reviews,
- g) HQ EM did not actively participate in most of the reviews in either an oversight or assistance role. DNFSB staff observed many of the reviews, and
- h) Most of the EM facilities reviewed had interim safety documentation and did not have final authorization basis documentation approved under the nuclear safety management rule at the time of the review

The specific recommendations by the Review Team are as follows:

- EM sites need to maintain an up-to-date listing of vital safety systems (VSS) that is derived from the current authorization basis document approved under the Nuclear Safety Rule. The list of VSS should also include a subset listing of systems that are "mission critical" to the DOE.
- EM sites need to apply resources to ensure continued operability of VSS.
- DOE must establish reasonable expectations for assignment and qualification of site contractor system engineers.
- The DOE subject matter experts need to have the knowledge and training to properly oversee contractor system engineers and the operability of VSS's.
- HQ EM needs to establish a requirement that all newly approved or substantially improved DSAs go through an implementation review process, similar to the successful Rocky Flats nuclear safety program implementation validation review (IVR) process.

- EM sites need to fully incorporate the Phase II assessment process into their assessment programs and periodically perform VSSs in accordance with this process.
- EM sites should apply special emphasis on Configuration Management (CM) and Safety Authorization Basis (AB) in their ongoing assessment programs.