



Department of Energy

Washington, DC 20585
February 2, 2004

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

Dear Mr. Chairman:

This letter is being provided in response to Commitment 4.6 of the Department of Energy (DOE) Implementation Plan for Defense Nuclear Facilities Safety Board's Recommendation 2002-3, *Requirements for the Design, Implementation, and Maintenance of Administrative Controls*. This commits the Office of Environmental Management (EM) to review field implementation of critical administrative controls and verify that they are developed, implemented, and maintained as part of safety basis implementation or operational oversight. The first deliverable of this commitment is a schedule for implementation reviews and implementation review reports.

In July 2003, the Assistant Secretary for EM initiated field reviews at EM sites to evaluate the overall control selection methodology established within the safety basis for selected EM facilities. So far, Mr. Dae Chung and his team of selected individuals from around the DOE complex, has performed reviews at the Savannah River and Hanford sites (including facilities managed by the Office of River Protection). Reviews have focused on the adequacy of controls within facility safety bases, as well as DOE field office safety basis review process and functional assessment activities.

Based on insights from the initial review at Savannah River, a review plan was prepared and issued to the EM field sites in October 2003. The review schedule was temporarily postponed in order to consider implications of the Nuclear Technical Safety Position and a draft DOE technical standard on administrative controls, both prepared in accordance with commitments in the 2002-3 implementation plan. Given the time frame for finalizing the draft standard, EM will resume field reviews and continue to evaluate the overall control selection process and attention given to critical administrative controls. EM will also continue to participate in the draft standard's development and ensure that it is reflected within review criteria, as appropriate. Once the draft standard is finalized, EM plans to evaluate whether DOE expectations are appropriately reflected within EM facility safety bases.

The current review schedule is as follows:

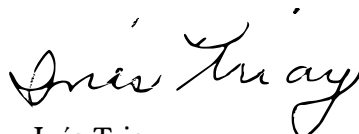
- March 2004 –Oak Ridge Reservation/Oak Ridge Operations Office
- April 2004 –Paducah and Portsmouth/Lexington Office
- May 2004 – Idaho National Engineering and Environmental Laboratory/Idaho Operations Office
- June 2004 –Lawrence Livermore National Laboratory/Livermore Site Office (EM operations)
- June 2004 – Nevada Test Site/Nevada Site Office (EM operations)
- July 2004 – Waste Isolation Pilot Plant /Carlsbad Operations Office
- September 2004-Follow-up at Hanford and Savannah River Sites as needed to capture any changes to original review criteria

A final report will be issued consistent with milestone 4.6.2 in the 2002-3 implementation plan, and EM will issue draft summaries of observations and lessons learned within 30 days of each review. These summaries will be provided to the Board's staff.

Irrespective of field review activities, EM continues to emphasize the important role of administrative controls at our facilities. It is my expectation that DOE safety basis reviewers will verify adequacy of contractor implementation actions necessary to implement all facility safety controls consistent with supplemental guidance issued by the Assistant Secretary on May 28, 2002. Further, EM field sites have been provided with specific guidance on administrative controls as discussed in *EM Guidelines and Lessons Learned for Nuclear Facility Safety Control Selection and Implementation*, issued on May 20, 2003.

If you have any questions, please call me or Mr. Dae Chung, Acting Director of Licensing and Chief Safety Officer, at 301-903-3968.

Sincerely,



Inés Triay
Deputy Chief Operating Officer
Office of Environmental Management