



Department of Energy
National Nuclear Security Administration
Washington, DC 20585



MAR 16 2006

The Honorable A. J. Eggenberger
Chairman
Defense Nuclear Facilities Safety Board
625 Indiana Avenue, N.W., Suite 700
Washington, D.C. 20004-2901

Dear Mr. Chairman:

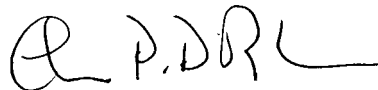
Commitment 4.6.2 of the Department's implementation plan for your Recommendation 2002-3 calls for implementation reviews of existing Specific Administrative Controls (SACs) and a report to the Defense Nuclear Facilities Safety Board (DNFSB) by June 30, 2005. On August 1, 2005, the National Nuclear Security Administration (NNSA) reported the completion of all reviews at NNSA sites except the Sandia National Laboratories and the Y-12 National Security Complex. The reviews at these two sites are now complete. The compact disk forwarded with the letter includes the complete data packages for all NNSA sites and NNSA's guidance to the sites concerning these reviews.

The Lessons Learned from these reviews summarized from the data packages and forwarded with the earlier transmission were not affected by the final reviews and are repeated with this transmittal for completeness. Corrective actions noted in the individual data sheets are complete except as noted below:

- Los Alamos National Laboratory (LANL): Changes to SACs required to meet the requirements of DOE-STD-1186-2004 have been incorporated into safety basis documents and have been implemented except for a very small number that are pending approval of an associated safety basis document. The SACs will be implemented as required by 10 CFR Part 830 following document approvals. LANL is currently independently validating the implementation of all Technical Safety Requirement level controls as a part of the Operational Effectiveness program. This review is scheduled to complete by September 30, 2006.
- Lawrence Livermore National Laboratory: Corrective actions are expected to be complete by June 30, 2008.

This transmittal completes all NNSA commitments related to DNFSB Recommendation 2002-3. If you have any questions about this submission or aspects of our actions on this recommendation, please contact me or have your staff contact Jeff Underwood at (301) 903-8303.

Sincerely,

A handwritten signature in black ink, appearing to read 'T. P. D'Agostino', with a long horizontal flourish extending to the right.

Thomas P. D'Agostino
Deputy Administrator
for Defense Programs

Enclosures

cc w/enclosures:

M. Whitaker, DR-i

J. McConnell, NA-2.1

T. Wyka, NA-3.6

DNFSB 2002-3 Site Lessons Learned From Administrative and Field Implementation Reviews of Specific Administrative Controls (SACs)

Lawrence Livermore National Laboratory:

Exact quantities of Special Nuclear Material stored in waste drums or boxes cannot be exactly determined without following rigorous validation and assay procedures.

Y-12 National Security Complex:

Utilize a multi-disciplined team for document review ensures the coverage of issues regarding operations and compliance.

Conduct regular interface between responsible Federal and contractor personnel to ensure that identified Specific Administrative Controls (SACs) and their purpose are fully understood by all interested parties.

Sandia National Laboratories:

Take advantage of safety-based reviews to identify, annotate and act upon identified issues such as those discovered in connection with the Sandia Pulse Reactor Facility (SPRF) review.

Compare SAC identified controls/issues and proposed corrective actions with hazard analyses to determine the accuracy and usability of the hazard analysis process and to determine if an acceptable level of risk exists.

Pantex Plant:

List individual attributes of the controls separately. This makes verification of implementation easier. Also, only the attributes of the action that contribute to the safety function should be listed (i.e., do not include actions that do not directly relate to the control).

The type of procedure or training to be applied needs to be stated. In the accident analysis, the reliability of the control depends on the method of implementation. Therefore, the method of implementation (step-by-step vs. reference procedure) needs to be stated.

The actual procedure where the control is implemented should be listed in the control description. This makes change control easier.

The personnel who will be writing the procedure and those who will be implementing the procedure need to be involved in writing the control to assure it is clear and can be implemented. This will save time during implementation.

When the same control is documented in different Documented Safety Analyses (DSA), the wording should be exactly the same. This will make implementation easier.

The level of detail to be captured in the Technical Safety Requirements (TSR) needs to be determined and agreed to with the Department of Energy/NNSA organization.

The method to flow training requirements into the implementing documents needs to be established based on the site-specific training program.

For each control, an “owner” needs to be established when the control is being developed. If this is not done, there is a good chance there will be incomplete review of the control during development and changes will be needed during the implementation.