

A.J. Eggenberger, Chairman
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DEFENSE NUCLEAR FACILITIES SAFETY BOARD

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January 30, 2007

The Honorable J. Clay Sell
Deputy Secretary of Energy
1000 Independence Avenue, SW
Washington, DC 20585-1000

Dear Mr. Sell:

The Defense Nuclear Facilities Safety Board (Board) was recently provided a copy of a December 21, 2006, memorandum from the Department of Energy (DOE) Chief Operating Officer for Environmental Management (EM). This memorandum provides EM expectations for implementing certain aspects of DOE Order 425.1C, *Startup and Restart of Nuclear Facilities*, and was issued in response to weaknesses recently identified in the readiness review processes at several sites. Specifically, the contractor at the Savannah River Site began a Readiness Assessment before the Documented Safety Analysis (DSA) was approved, and at the Idaho Closure Project, the contractor conducted a Readiness Assessment for an activity that met the criteria for a more rigorous Operational Readiness Review, and did so without DOE-EM concurrence.

The Board commends DOE-EM for their decisive action to address these issues and the subsequent steps by DOE site offices and site contractors to prevent their recurrence. The Board agrees with the actions prescribed in the memorandum and believes that when properly implemented, they will significantly improve EM readiness review processes. However, the Board is concerned that these actions are limited to EM, and it is not clear that the National Nuclear Security Administration has benefitted from the lessons learned these events can provide.

The Board understands a working group is being formed, led by the Office of Health, Safety and Security, to evaluate potential changes to the directives and guidance dealing with readiness reviews. The events mentioned above should be included in their evaluations and DOE may want to consider strengthening the requirements in DOE Order 425.1C to include approval of the DSA prior to the start of the readiness review.

The readiness review process instituted by DOE represents the culmination of many years of experience in safely starting up hazardous facilities. DOE must remain vigilant to ensure that these processes remain rigorous and effective. The Board looks forward to working with DOE in its efforts to improve the readiness review process.

Sincerely,

A handwritten signature in black ink, appearing to read "A. J. Eggenberger". The signature is fluid and cursive, with a large initial "A" and "E".

A. J. Eggenberger
Chairman

c: The Honorable James A. Rispoli
The Honorable Thomas P. D'Agostino
Mr. Glenn S. Podonsky
Mr. Mark B. Whitaker, Jr.