



Department of Energy
National Nuclear Security Administration
Washington, DC 20585

May 21, 2007

OFFICE OF THE ADMINISTRATOR

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

Dear Mr. Chairman:

The National Nuclear Security Administration (NNSA) portion of Commitment 9B in the Department of Energy's October 2006 revision of the Implementation Plan (IP) to Improve Oversight of Nuclear Operations has been completed. This IP is in response to the Defense Nuclear Facilities Safety Board Recommendation 2004-1, *Oversight of Complex, High Hazard Nuclear Operations*.

The deliverable per Commitment 9B was to "Report to the Secretary on review activities to evaluate implementation of the processes and criteria for delegating authorities to field personnel for fulfilling safety responsibilities and to determine whether all existing delegations of authority to the Department of Energy Field Offices have been and are being made using these new processes and criteria."

The enclosed report, *NNSA Application of the Deputy Secretary Criteria for Delegation of Nuclear Safety Authorities*, was provided to the Secretary as a basis to inform him that NNSA had completed Commitment 9B.

As further explained in the report, NNSA has not delegated nuclear safety authorities to personnel at the Nevada Site Office (NSO), pending verification of actions NSO has taken to strengthen Site Office capabilities and capacity. In addition, only limited delegations were made to the Los Alamos Site Office; additional delegations will be considered pending continued progress towards enhancing Site Office capacity/capabilities.

Sincerely,

A handwritten signature in black ink that reads "W C Ostendorff".

William C. Ostendorff
Acting Administrator

Enclosure

cc:

M. Whitaker, HS-1.1



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Department of Energy
National Nuclear Security Administration
Washington, DC 20585

May 21, 2007

OFFICE OF THE ADMINISTRATOR

MEMORANDUM FOR THE SECRETARY

FROM: William C. Ostendorff 
Acting Administrator

SUBJECT: COMPLETION OF THE NATIONAL NUCLEAR SECURITY
ADMINISTRATION (NNSA) PORTION OF COMMITMENT 9B
OF DEFENSE NUCLEAR FACILITIES SAFETY BOARD
(DNFSB) IMPLEMENTATION PLAN (IP) FOR
RECOMMENDATION 2004-1

The purpose of this memorandum is to report that NNSA has completed its portion of Commitment 9B of the IP for DNFSB Recommendation 2004-1. Completion of this Commitment required a report to the Secretary on the process and criteria to delegating safety authorities to the field.

To meet the criteria specified by the December 27, 2005, memorandum from Sell to Brooks, *Delegations of Safety Authorities*, NNSA developed an NNSA Delegation Approach as promulgated by the February 16, 2006, memorandum from Brooks to Sell, *Delegations of Safety Authorities*. The attached report, *NNSA Application of the Deputy Secretary Criteria for Delegation of Nuclear Safety Authorities*, provides analysis and detailed documentation to demonstrate that NNSA rigorously applied the Deputy Secretary's criteria for nuclear safety authority delegations. This report satisfies the NNSA deliverable for Commitment 9B.

As further explained in the report, NNSA has not delegated nuclear safety authorities to personnel at the Nevada Site Office (NSO), pending verification of actions NSO has taken to strengthen Site Office capabilities and capacity. In addition, only limited delegations were made to the Los Alamos Site Office (LASO); additional delegations will be considered pending continued progress towards enhancing Site Office capacity/capabilities.

There are still areas for improvement with respect to delegations, and NNSA will need to complete follow-up actions, including a self-assessment of the delegation process (Commitment 9C, due December 31, 2007), development of a delegation spreadsheet/database, and institutionalization of the NNSA delegation procedure.

Attachment

cc w/attachment:
C. Sell, S-2



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**NA-173 Report on NNSA Application of the
Deputy Secretary Criteria for Delegation of Nuclear Safety Authorities
April 2007**

Summary:

To meet the criteria specified by the Deputy Secretary (S-2) as part of Commitment 9A of Defense Nuclear Facilities Safety Board (DNFSB) Recommendation 2004-1, NNSA developed an NNSA Delegation Approach. The completion of this report on the application of the NNSA Delegation Approach satisfies the NNSA deliverable for Commitment 9B.

The NNSA Delegation Approach included development of the NNSA delegation procedure, the execution of which resulted in a consistent, objective application of the S-2 delegation criteria. NNSA will need to complete follow-up actions, including a self-assessment of the delegation process (Commitment 9C, due December 31, 2007), development of a delegation spreadsheet/database, and an update to the NNSA delegation procedure to reflect lessons learned from the initial delegations.

A summary table of NA-10 to Site Office nuclear safety delegations is provided below.

NNSA has applied the S-2 delegation to all NNSA nuclear sites. However, nuclear safety delegations have not been made to the Nevada Site Office (NSO), pending verification by NNSA headquarters that NSO has made adequate progress in correcting issues identified in the November 2005 Chief of Defense Nuclear Safety (CDNS) biennial review. In addition, only limited delegations were made to the Los Alamos Site Office (LASO); additional delegations will be considered pending continued progress towards enhancing Site Office capacity/capabilities.

NA-10 to Site Office Nuclear Safety Delegations

Site Office / Individuals	Authorities Delegated	Comments
Dan Glenn, Acting Manager, LASO	Authorization Basis (AB) Integrated Safety Management System (ISMS) Approval of Startup Notification Reports per DOE Order 425.1C	AB authority delegated separately on February 16, 2007. ISMS authority delegated in April 2007. Additional nuclear safety delegations to LASO will be considered pending additional LASO progress in enhancing Site Office capability/capacity in the related functional areas (e.g., LASO readiness program).

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Site Office / Individuals	Authorities Delegated	Comments
Camille Yuan-Soo Hoo, Manager, Livermore Site Office (LSO)	<p>AB</p> <p>Startup and Restart of Nuclear and non-Nuclear Facilities</p> <p>ISMS</p>	<p>Approved – Compensatory measures required due to Ms. Yuan-Soo Hoo not being Senior Technical Safety Manager (STSM) qualified.</p> <p>NA-10 retained authority to approve DOE Order 420.1B exemptions for Site Offices where the manager is not STSM qualified.</p> <p>NA-10 retained approval authority for certain Category 2 nuclear facility AB documents (specified in delegation memo).</p>
Phil Hill, LSO	<p>AB</p> <p>ISMS System Descriptions</p>	<p>Approved – AB Delegations limited only to Justification for Continued Operations (JCO) when the Site Office Manager (SOM) is unavailable and approval is necessary to support safe operations.</p>
Rich Mortensen, LSO	<p>AB</p> <p>ISMS System Descriptions</p>	<p>Approved – AB Delegations limited only to JCO when the SOM is unavailable and approval is necessary to support safe operations.</p>
Gerald Talbot, Manager, NSO R. T. Brock, NSO		<p>Nuclear safety delegations to NSO have not yet been made pending confirmation that NSO has made adequate progress in completing corrective actions from the November 2005 CDNS biennial review (which identified weaknesses in functional areas that support Site Office capability/capacity to exercise nuclear safety authorities); a review of NSO progress is expected in May 2007.</p>
Dan Glenn, Manager, Pantex Site Office (PXSO)	<p>AB</p> <p>Startup and Restart of Nuclear and non-Nuclear Facilities</p> <p>ISMS</p> <p>Facility Safety (i.e., approval of exemptions from DOE O 420.1B requirements)</p>	<p>Approved – no compensatory measures required.</p>
Steve Erhart, PXSO (original request)	<p>AB</p>	<p>Approved - Delegations limited to periods when the SOM is unavailable (for new Documented Safety Analyses (DSAs) and at all times for JCO or revisions to DSAs.</p>
Steve Erhart, PXSO (second request while Mr. Erhart is serving as Acting Manager of PXSO)	<p>AB</p> <p>Startup and Restart of Nuclear and non-Nuclear Facilities</p> <p>ISMS</p> <p>Facility Safety (i.e., approval of exemptions from DOE O 420.1B requirements)</p>	<p>These authorities remain valid for the period in which Mr. Erhart serves as Acting Manager of PXSO (while Mr. Glenn serves as Acting Manager of LASO).</p>

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Site Office / Individuals	Authorities Delegated	Comments
Karl Waltzer, PXS0	AB	Approved - Delegations limited to periods when the SOM is unavailable (for new DSAs) and at all times for JCO or revisions to DSAs.
Kim Davis, Deputy Manager, Sandia Site Office (SSO)	AB Startup and Restart of Nuclear and non-Nuclear Facilities ISMS	As a technical Deputy Manager, Central Technical Authority (CTA) concurrence was not required for Ms. Davis' delegations. Delegation of authority to approve exemptions to DOE Order 420.1B below the SOM is not specifically permitted under the Order (and was not included to Ms. Davis).
Rick Arkin, Manager, Savannah River Site Office (SRSO)	AB Startup and Restart of Nuclear and non-Nuclear Facilities ISMS	Approved – Compensatory measures required due to Mr. Arkin not being STSM qualified. NA-10 retained authority to approve DOE Order 420.1B exemptions for Site Offices where the manager is not STSM qualified. NA-10 retained approval authority for certain Category 2 nuclear facility AB documents (specified in delegation memo).
Bruce Wilson, SRSO	AB ISMS System Descriptions	Approved – AB Delegations limited only to JCOs when the SOM is unavailable and approval is necessary to support safe operations.
Kevin Hall, SRSO	AB ISMS System Descriptions	Approved – AB Delegations limited only to JCOs when the SOM is unavailable and approval is necessary to support safe operations.
Ted Sherry, Manager, Y-12 Site Office (YSO)	AB Startup and Restart of Nuclear and non-Nuclear Facilities ISMS System Descriptions Facility Safety (i.e., approval of exemptions from DOE O 420.1B requirements)	Approved – no compensatory measures required.
Doug Dearolph, YSO	AB ISMS System Descriptions	Approved – AB Delegations limited to periods when the SOM is unavailable (for new DSAs) and at all times for JCO or revisions to DSAs.

Purpose of Report:

To evaluate the National Nuclear Security Administration's (NNSA) application of the Deputy Secretary's criteria for delegations of nuclear facility safety authorities (S-2 criteria). This report satisfies the intent of task 6: Performing Periodic Self-Assessments on Assignment of Responsibilities or Delegation of Authorities to Headquarters Personnel.

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Transmittal of this report to the Secretary constitutes the NNSA deliverable for DNFSB Recommendation 2004-1 Commitment 9B:

Report to the Secretary on review activities to evaluate implementation of the processes and criteria for delegating authorities to field personnel for fulfilling safety responsibilities, and to determine whether all existing delegations of authority to the DOE Field Offices have been and are being made using these new processes and criteria.

Background:

This report focuses on nuclear safety delegations from NNSA Headquarters to the Site Offices as described in the NNSA Delegation Approach and will not serve as a self-assessment of the delegation of nuclear safety authorities.¹

In Recommendation 2004-1, the DNFSB identified that,
...sometimes delegations of authority have been made using inconsistent standards and without verifying individual and organizational capabilities to carry out the responsibilities. To have confidence that safety responsibilities are properly performed, the Department must more clearly establish processes and criteria for delegations of authority. After delegations of authority are made, the delegations must be periodically reviewed to ensure that the individuals and organizations maintain the necessary capability and capacity on which the delegation was made.²

In addressing this issue, the Deputy Secretary developed a set of criteria to ensure that delegations of nuclear facility safety authorities were made to clear and consistent criteria. These criteria were promulgated in the December 27, 2005, memo from Sell to Brooks, et al. After evaluating the criteria, the NNSA Delegation Approach was issued in the February 13, 2006, memorandum from the Administrator to the Deputy Secretary. The NNSA Delegation Approach consisted of six tasks designed to ensure that the Deputy Secretary's delegation criteria were effectively implemented.

Initial Evaluation of NNSA Safety Delegations from Headquarters to Site Offices:

The first task of the NNSA Delegation Approach was to evaluate existing delegations from NNSA headquarters to the Site Offices and determine if they were in compliance with the S-2 criteria. The results of this evaluation essentially validated the original issue identified by the DNFSB, as there were deficiencies with regards to delegations at nearly every site. These included:

- Delegations made to positions, instead of individuals
- Inadequate or non-existent documentation of delegations from NA-10 to the Site Offices

¹ To satisfy the self-assessment requirement of Reference 1, NNSA has an additional commitment related to delegations, 9C of the 2004-1 IP, due December 31, 2007.

Approved biennial (every 2 years) program office self-assessments of safety function assignment at the program office level.

² text taken from Section 5.1.4 of Rev 2 of the 2004-1 IP

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- Delegations to individuals no longer at the site
- Inconsistent or non-stated criteria for delegations

NNSA Delegation Procedure:

The second task of the NNSA Delegation Approach was to develop a procedure to implement the S-2 criteria for NNSA delegations from NNSA Headquarters to the field. In conjunction with Site Office input, the NNSA Delegation Procedure was developed to apply to specified nuclear safety delegations³:

- *Authorization Basis* (includes approval of DSAs and technical safety requirements and approval of Safety Evaluation Reports; approval of unreviewed safety question procedures; approval of preliminary DSA for Critical Decisions)
- *Startup and Restart of Nuclear and non-Nuclear Facilities including Accelerators and Nuclear Explosive Operations* (includes restart authority for Hazard Category 2 and 3 nuclear facilities and High Hazard non-nuclear facilities; startup authority for Hazard Category 3 nuclear facilities and High Hazard non-nuclear facilities)
- *Integrated Safety Management System (ISMS) and Contractor Assurance Systems (CAS)* (includes approval of annual contractor ISMS and CAS description annual updates)
- *Facility Safety* (i.e., approval of exemptions from DOE O 420.1B requirements)

Subsequent to issuance of the NNSA Delegation Procedure, a revision to DOE Order 226.1 removed the requirement for DOE to approve CAS descriptions and subsequent updates. As such, although all sites requested this authority, it was not included in the delegation memorandums from NA-10.

The NNSA Delegation Procedure includes guidance on how to measure Site Office capacity and capabilities and provisions for compensatory measures, where appropriate. The procedure also addresses delegations that require CTA concurrence.

The procedure was approved by the CTA in August 2006, and promulgated to the Site Offices. Due to deficiencies noted in Task 1, a provision was included in the procedure that all legacy delegations be re-submitted for approval by the Deputy Administrator for Defense Programs (NA-10).

In response, all Site Offices with nuclear safety responsibilities submitted delegation nominations for their legacy delegations. Delegation requests from the Site Offices were reviewed by NA-17 staff and the specific delegation criteria for individuals and sites were documented, reviewed, and concurred upon by two senior NA-10 staff managers.

³ For other delegated authorities identified in the NNSA or DOE Functions Responsibilities and Authorities Manual (FRAM) but not specified as applicable to the main provisions of the procedure, the NNSA Delegation Procedure included a provision that Site Offices maintain a documented list of such authorities and ensure that individuals/site office meet any requirements from the authority's source directive (e.g., DOE O 451.1B for NEPA Compliance Officers).

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Several delegations required CTA concurrence, and all delegation packages were reviewed by the CDNS staff. The CDNS staff conducted thorough independent reviews of all delegation packages (including those that didn't require CTA concurrence), following an approach CDNS developed for their internal review.

Staff from the NNSA Senior Advisor for Environmental Safety and Health (NA-3.6) also reviewed the delegation packages. Upon obtaining the necessary concurrences, the delegation packages were sent to NA-10 for approval.

Assessment of the Effectiveness of the NNSA Delegation Procedure:

Overall, application of the NNSA Delegation Procedure successfully corrected the deficiencies identified during the initial evaluation and described earlier in this report. Application of the NNSA delegation procedure also effectively applied the S-2 criteria to legacy (and new) NA-10 to Site Office delegations. NNSA now has well documented nuclear safety delegations from NA-10 to the Site Offices that were based on consistent criteria.

What Worked Well:

Leveraging of Existing Information – NNSA was able to leverage existing evaluation information from the CDNS biennial reviews of the Site Offices, resulting in an efficient and consistent evaluation of Site Office capacity and capabilities. The CDNS biennial reviews included in-depth evaluation of key nuclear safety functional areas, including Safety Basis, Startup/Restart of Nuclear Facilities, Integrated Safety Management, Criticality Safety (for DOE O 420.1B exemption delegations), Conduct of Engineering (for DOE O 420.1B exemption delegations), and Fire Protection (for DOE O 420.1B exemption delegations). Use of this existing information helped ensure that the delegation evaluations objectively considered Site Office capacity and capabilities in a consistent and sufficiently detailed manner, yet minimized the impact of the NNSA Delegation Approach on the Site Office personnel preparing the delegation requests. Future CDNS biennial reviews will similarly provide information that can be utilized in the biennial self-assessments required by the December 27, 2005, memo from the Deputy Secretary to the Administrator.

NNSA Headquarters Coordinated Reviews – The NA-10 delegation approval packages were reviewed by staff from the CDNS, NA-3.6, and NA-17. As noted earlier, the delegation review forms (documenting individual and Site Office capabilities and capacities) were reviewed and signed by two senior NA-10 managers. Based on the involvement of these key personnel, all delegation requests received careful scrutiny and the resultant delegations demonstrated consistent attributes.

Areas for Improvement:

A number of areas were identified where the process can be improved for future delegation requests. These include:

1. *Evaluation of Individual Qualification / Capabilities* – The S-2 criteria for individual qualifications or capabilities was limited to completing the Nuclear Executive Leadership Training (NELT) and be STSM qualified. The NNSA Delegation

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Procedure extended the STSM requirement to all nuclear safety delegations covered in the procedure. The inclusion of other qualification requirements was explored during development of the NNSA Delegation Procedure; however, no established qualification requirements beyond STSM could be identified that seemed reasonable to extend to the nuclear safety delegations.

DOE's STSM program has been previously identified as weak; however, DOE is taking several steps to improve the rigor of this program. As noted in the DNFSB Recommendation 2004-1 IP, the Federal Technical Capabilities Panel has an action to build on the STSM qualification program, using the Facility Representative program as a model. Thus, this weakness may be self-correcting as the STSM qualification program matures.

It was also noted, though, that several individuals nominated for nuclear safety delegations had significant experience in the delegation areas that weren't addressed by the S-2 criteria. Many of the delegations below the Site Office Manager were made relying upon this applied experience. Thus, consideration should be given to revise the NNSA Delegation Procedure to include consideration of experience.

2. *Delegations Below Site Office Manager* - The S-2 criteria states the expectation that nuclear safety delegations are to be made only to senior management at field sites. The criteria include a provision that CTA concurrence be obtained for delegations below the manager or most senior deputy of a field element. During execution of the NNSA Delegation Procedure, a number of delegations were made to individuals that required CTA concurrence. In the approval memorandums, provisions were included that limited exercise of the authority to occasions when the Site Office Manager was unavailable and exercise of the authority was necessary to ensure continued safe operations. Approval authority for revisions to AB documents was delegated to PXSO and YSO, Site Offices with an STSM qualified manager and no compensatory measures for delegated authorities. However, the expectation that delegation of nuclear safety authorities below the SOM should be limited is not expressed in the NNSA Delegation Procedure. Consideration should be given to revise the procedure to clearly delineate the criteria for which it is proper to delegate to individuals below the Site Office Manager as well as the circumstances when subsequent exercise of the authority is proper.
3. *Procedure implementation problems* – The Site Offices prepared delegation requests in accordance with the NNSA Delegation Procedure, and no significant problems arose during this process. However, a number of sites requested delegation of authorities not covered by the procedure, even though the set of such authorities was prominently and explicitly stated. To facilitate accurate future implementation of the procedure, consideration should be given to formalizing its status and ensuring that it is made readily available to all NNSA employees.

Completion of Tasks in the NNSA Delegation Approach:

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Below is a table that lists and provides a brief synopsis of the six tasks of the NNSA Delegation Approach.⁴

NNSA Delegation Approach Task Completion

Task Number / Synopsis	Status / Comments
1. Initial evaluation of NNSA nuclear safety delegations to Site Offices.	Completed as described in report – several deficiencies identified.
2. Prepare process to ensure NNSA delegations meet S-2 criteria.	Completed as described in report with the preparation and dissemination of the NNSA Delegation Procedure.
3. Take steps to correct deficiencies identified in Task 1.	Completed via execution of the NNSA Delegation Procedure.
4. Take steps as appropriate for delegations in DOE FRAM not covered in Task 1.	Provision included in the NNSA Delegation Procedure that Site Offices maintain a documented list of such authorities and ensure that individuals/site office meet any requirements from the authority's source directive (not evaluated).
5. Revise NNSA FRAM as necessary based on previous actions taken in the NNSA Delegation Approach	NA-10, NA-3.6, and NA-2.1 (CDNS) will be forming a team to revise the NNSA Headquarters FRAM in the near future.
6. Perform an assessment of the NNSA Delegation Procedure	Addressed by this report as described above; full self-assessment is covered by Commitment 9C of the DNFSB 2004-1 IP (due date 12/31/07).

Tasks 4 and 5 were not discussed in detail in this report. Task 4 (take steps for delegations in the DOE FRAM not covered by task 1 (i.e. delegations other than nuclear safety delegations)) was addressed in the NNSA Delegation Procedure by inclusion of a provision that Site Offices maintain a list of such delegations and make sure any requirements from the associated source directive are met.

Task 5 addresses revising the NNSA FRAM, as necessary. NA-10, NA-3.6 and NA-2.1 are forming a team to update/revise the NNSA headquarters FRAM, and delegation-related authorities and responsibilities will be addressed in the next revision.

Task 6 was originally intended to be the initial self-assessment required by the S-2 criteria. As discussed previously, the self assessment will be fulfilled by Commitment 9C to the DNFSB Recommendation 2004-1 IP. Taken together, the NNSA Delegation Procedure/Approach and this report address all of the S-2 self-assessment criteria for nuclear safety delegations and could serve to fulfill the vast majority of a self-assessment. However, a self-assessment for Commitment 9C conducted by the December 31, 2007, due date can evaluate progress on the areas for improvement described above, as well as the

⁴ The NNSA Delegation Approach is Reference 2 to this report and the full task statements can be found within the reference.

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date can evaluate progress on the areas for improvement described above, as well as the currently non-evaluated area of Site Office implementation of the provision for delegations of safety authorities not covered by the NNSA (nuclear) Delegation Procedure.

Next Steps:

1. Develop a delegation spreadsheet/database to ensure that delegated authorities are tracked and kept up to date (i.e., tracking personnel changes, qualification lapses, Site Office capacity/capability changes and ensuring appropriate action is taken as necessary delegations to update or rescind delegated authorities). Estimated Date of Completion: June 30, 2007.
2. Revise the NNSA Delegation procedure – As noted earlier in this report, addressing areas for improvement, the NNSA Delegation Procedure should be revised to remove the Legacy Delegation section and include any necessary changes based on other improvements, such as developing a better method for evaluating individual capabilities. Estimated Date of completion: October 31, 2007.
3. Self assessment per DNFSB Recommendation 2004-1 IP Commitment 9C -- As described above, complete the self-assessment by December 31, 2007.

References:

The following documentation and records were reviewed and utilized in making this report. Delegation records will be maintained and updated as necessary to ensure NNSA maintains an accurate list of nuclear safety authority delegations to the Site Offices, supported by thorough and accurate documentation.

- (1) Memorandum from Sell to Brooks et. al., *Delegations of Safety Authorities*, dated December 27, 2005, and Attachment (Delegation Criteria).
- (2) Memorandum from Brooks to Sell, dated February 13, 2006, *Delegations of Safety Authorities*, and Attachment (NNSA Delegation Approach).
- (3) NNSA Delegation Procedure and transmittal memorandum (Brooks for Distribution).
- (4) NNSA Chief Defense Nuclear Safety Delegation Review Approach Document and example, CDNS Review memorandum (for the Savannah River Site Office delegations).
- (5) Los Alamos Site Office Delegation Documents:
 - a. Incoming Delegation Request Memo, dated February 6, 2007.
 - b. NA-10 delegation memo to Dan Glenn (AB delegations); NA-10 delegation memo to Dan Glenn for ISMS and SNR approvals.
 - c. NNSA HQ Delegation Review Forms for LASO.
- (6) Livermore Site Office Delegation Documents:
 - a. Incoming Delegation Request Memo, dated October 25, 2006.
 - b. NA-10 delegation memo for LSO, dated May 8, 2007.
 - c. CTA concurrence memo for LSO, dated April 26, 2007.

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(7) Nevada Site Office Delegations Documents:

- a. Incoming Delegation Request Memo, October 27, 2006.

(8) Pantex Site Office Delegation Documents:

- a. Incoming Delegation Request Memo, September 12, 2006.
- b. NA-10 delegation memo to Dan Glenn / Steve Erhart / Karl Waltzer dated October 19, 2006.
- c. Incoming memo requesting additional delegations to Steve Erhart as Acting Manager, dated January 16, 2007.
- d. NA-10 delegation memo to Steve Erhart (as Acting Manager of PXSO) dated February 27, 2007.
- e. CTA concurrence memos for PXSO (October 18, 2006 (original delegations) and February 13, 2007 (Erhart Acting Manager delegations)).
- f. NA-17 / NA-12 Delegation Review Forms for PXSO.

(9) Sandia Site Office Delegation Documents:

- a. Incoming Delegation Request Memo, dated October 17, 2006.
- b. NA-10 delegation memo to Kim Davis.
- c. NA-17 / NA-11 Delegation Review Forms for SSO.

(10) Savannah River Site Office Delegation Documents:

- d. Incoming Delegation Request Memo, dated October 11, 2006.
- e. NA-10 delegation memo to Arkin / Wilson / Hall, dated March 29, 2007.
- f. CTA concurrence memo for SRSO, dated March 16, 2007.
- g. NA-17 / NA-12 Delegation Review Forms for SRSO.

(11) Y-12 Site Office Delegation Documents:

- h. Incoming Delegation Request Memo, dated October 25, 2006.
- i. NA-10 Delegation Memo to Sherry / Dearolph, dated March 26, 2007.
- j. CTA concurrence memo for YSO, dated March 16, 2007.
- k. NA-17 / NA-12 Delegation Review Forms for YSO.