



Department of Energy

Washington, DC 20585

May 20, 2010

The Honorable Peter S. Winokur
Chairman
Defense Nuclear Facilities Safety Board
625 Indiana Avenue, NW, Suite 700
Washington, DC 20004-2901

Dear Mr. Chairman:

On behalf of the Secretary of Energy, I am responding to your May 5, 2010, letter which expressed concerns regarding the Department of Energy's (DOE) directives reform efforts as outlined in Deputy Secretary Poneman's March 16, 2010, memorandum entitled "DOE 2010 Safety and Security Reform Plan." We fully agree with your statement that "any effort to overhaul the directives system should be undertaken with the objective of strengthening and improving the system while continuing to ensure adequate levels of protection and prevent accidents or incidents at defense nuclear facilities."

The Department's management principles make clear that we will succeed only through continuous improvement. In that spirit, we have been reviewing the Department's framework of requirements with a view toward enhancing productivity and achieving our vital and urgent mission goals, while maintaining the highest standards of safe and secure operations at Departmental facilities. The goal of the directives reform effort will be a set of requirements that protect workers, the public, and environment effectively and efficiently. We need to make sure that the remaining requirements are sufficient to direct the Department in performing its mission using the high standards of safety that both the Board and our stakeholders expect. While requirements may be streamlined through consolidation or elimination of duplicative or unnecessary provisions, the reduction is intended solely to improve the clarity and usability – hence the effectiveness – of requirements; not to reduce DOE's expectations for high standards of safety and security.

The Department's decision-making in this area will be guided by a revised Project Management Plan. The revised plan will implement a disciplined process to carefully assess the content and value of each requirement and the consequences of its removal or modification. We are working to modify our initial plan to incorporate feedback received from the Board by requiring the use of more robust, independent red-team reviews and establishing a clear technical basis for any changes in safety requirements. The revised plan, to be submitted to your staff in mid-June, will also clarify the specific criteria DOE is using to analyze individual directives to determine the need, if any, for their cancellation or consolidation and the steps DOE is taking to improve and strengthen directives. This clarification will be consistent with the checklist for

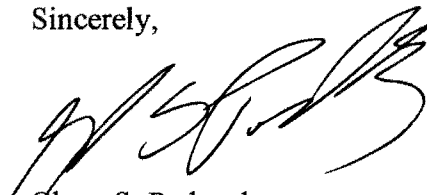


directives reform provided to the Board at the public hearing on May 12, 2010. Where sections of current directives that have otherwise been identified for cancellation are deemed essential for continued safety assurance, these sections will be migrated, through the Directives Review Board process, to other approved directives or standards before the current directives are cancelled.

With regard to Orders of Interest to the Board, we are committed to working with the Board and the Board's staff to assure that your concerns are heard, understood, and considered. We will identify all directives or portions of directives that were developed in response to Board recommendations or commitments. Any planned changes to such commitments, along with a basis for such changes, will be discussed with the Board staff in advance of addressing them as part of the monthly briefings to the Board that you have requested.

Please contact me at (202) 287-6071 if you have any questions.

Sincerely,



Glenn S. Podonsky