

Peter S. Winokur, Chairman  
Jessie H. Roberson, Vice Chairman  
Joseph F. Bader  
Sean Sullivan

**DEFENSE NUCLEAR FACILITIES  
SAFETY BOARD**

Washington, DC 20004-2901



April 4, 2014

The Honorable Ernest J. Moniz  
Secretary of Energy  
U.S. Department of Energy  
1000 Independence Avenue, SW  
Washington, DC 20585-1000

Dear Secretary Moniz:

The Defense Nuclear Facilities Safety Board (Board) is concerned that the process within the Department of Energy (DOE) to revise, update, and improve the DOE directives and technical standards of interest to the Board is too cumbersome. As a result, necessary revisions languish within DOE long after the need for revision is recognized. For example, on September 26, 2011, former Secretary Chu identified a lack of clarity in DOE Standard 3009, *Preparation Guide for U.S. Department of Energy Nonreactor Nuclear Facility Documented Safety Analyses*, and committed to revising the standard by a target date of March 31, 2012. Now two years past the initial target date, the standard has not been revised and approved.

A cumbersome and untimely approach to document revision delays correction of identified problems. Further, delay fosters confusion when operational practice diverges from outdated written guidance. For example, the National Nuclear Security Administration (NNSA) has for some time recognized that the names given to categories of nuclear explosive safety study deficiencies (“pre-start” and “post-start”) are logically inconsistent when used for operations that have already started. In July 2012, NNSA issued a “process deviation” directing use of different terminology for some on-going operations. A recent NNSA Central Technical Authority memorandum indicated a second process deviation was likely. Process deviations, however, create an inconsistency between practice and the as-yet unrevised DOE directives governing nuclear explosive safety. Rather than issuing process deviations, it would be more prudent to expeditiously revise the directives such that practice and written guidance are fully aligned.

The Board urges you to review the manner in which DOE’s own directives and technical standards are revised and updated. The goal of the review should be to eliminate barriers to the timely correction of identified problems and to eliminate any misalignment between practice and written guidance.

The Board notes that DOE's staff typically submits proposed revisions to nuclear safety documents to the Board's staff for review and comment. We welcome any suggestions you may have for improving the efficiency and effectiveness of our review.

Pursuant to 42 U.S.C. § 2286b(d), the Board requests a briefing within 90 days of receipt of this letter on the actions identified to improve the process to revise, update, and improve the DOE directives and technical standards of interest to the Board.

Sincerely,

A handwritten signature in black ink, appearing to read "Peter S. Winokur". The signature is stylized and somewhat cursive.

Peter S. Winokur, Ph.D.  
Chairman

c: Mrs. Mari-Jo Campagnone