



Department of Energy

Washington, DC 20585

December 12, 2024

The Honorable Joyce L. Connery
Chair
Defense Nuclear Facilities Safety Board
625 Indiana Avenue NW
Suite No. 700
Washington, DC 20004

Dear Chair Connery:

Thank you for your letter dated June 14, 2024, regarding the Board's assessment of the Department of Energy (DOE) Office of Environmental Management (EM) Savannah River Operations Office (SROO) Facility Representative (FR) Program and establishing a reporting requirement for a report and briefing regarding progress toward resolving the identified shortcomings.

DOE-SROO has been documenting and implementing procedures within its FR Program to align with DOE requirements and establish a robust FR oversight program.

The Board requested a briefing and report on the following topic areas:

1. FRs are providing adequate facility coverage;
2. FR assessments are of high quality;
3. FR management is providing the necessary guidance and safety oversight of the FR program;
4. FRs and their management are tracking safety issues and reviewing them to identify trends; and
5. DOE-SROO is prioritizing higher risk areas for FR safety oversight.

DOE has assembled the enclosed report to address the above-mentioned topics.

In accordance with your request, a briefing to the Board was conducted on November 13, 2024, to discuss this response. We welcome the Board's perspectives and look forward to continuing positive interactions with you and your staff.

If you have any questions, please contact me, or Mr. Michael D. Budney, Manager, Savannah River Operations Office, at (803) 952-7243.

Sincerely,

A handwritten signature in blue ink that reads "Candice Trummell". The signature is written in a cursive style.

Candice Trummell
Senior Advisor for Environmental Management

Enclosure

cc: Michael Budney, SR

Department of Energy Office of Environmental Management Savannah River Operations Office Facility Representative Program Report

The Department of Energy (DOE) Office of Environmental Management (EM) Savannah River Operations Office (SROO) has an effective and efficient Facility Representative (FR) program at the Savannah River Site (SRS) and continuously improves the FR program, which includes recruiting, training, and retaining qualified FRs to support the safe operations of its facilities in a manner that protects the workers, the public, and the environment. DOE-SROO continues to hire FRs with prior experience, such as Nuclear Regulatory Commission (NRC) inspectors, and those with Navy nuclear experience, and private power plant experience, to support a high standard of oversight. Continuous improvement is an integral part of how DOE-SROO operates its facilities. In the past 12 months, improvement efforts were made to address the topic areas identified by the Defense Nuclear Facilities Safety Board. The information provided below highlights some of the continuous improvement actions DOE-SROO has taken to strengthen its FR program.

1. FRs Are Providing Adequate Facility Coverage

- DOE-SROO revised its procedure to strengthen its processes, such as trending analysis, facility coverage, oversight, and assessment quality.
- Partnering senior FR with junior FR for coaching and mentoring.
- DOE-SROO established incentives to support recruiting and retaining key personnel for its FR program. DOE-SROO converted all its FR positions from GS to EK positions. EK positions have a pay band like the National Nuclear Security Administration pay system at the site, which minimizes the chances of losing qualified FRs.
- Operations Directors from each organization are playing a crucial role in prioritizing work areas for their FRs during their daily operations meetings, ensuring the efficiency and effectiveness of our operations.
- FRs are generally hired from the NRC, nuclear navy, and commercial nuclear power plants and are very familiar with oversight responsibilities and nuclear operations.

2. FR Assessments Are of High Quality

- Developed assessment templates with Lines of Inquiry that support routine assessment for our facilities.
- Increased FR staff by prioritizing our FR vacancies for hiring since it takes 18 months for candidates to complete their initial technical qualification program.
- Established an FR shared drive for lessons learned and training resources.
- Provided additional training for all DOE-SROO on conducting quality assessments and documenting issues to support trending analyses.
- Provided additional training during our FR quarterly meetings.
- Leveraging each organization's monthly Management Review Boards (MRBs) as a tool that ensures all FRs understand the expected standards for quality assessments.
- All assessments, even those with no findings or opportunities for improvements, will be presented to an MRB.

- DOE-SROO hires contractors that were former FRs with years of experience to help qualify and mentor new hires.

3. FR Management Is Providing the Necessary Guidance and Safety Oversight of the FR Program

- Filled critical positions to support the FR program. In the last 12 months, DOE-SR made significant strides by hiring the Director of Operations for Nuclear Materials Stabilization, and the Assistant Manager for Nuclear Material Stabilization, two pivotal roles that were previously vacant.
- Management Field Observations are conducted monthly by senior DOE-SROO staff, including the Manager, Deputy Manager, and Chief Engineer and are used as an opportunity to provide feedback to and interact with the FRs during those walkdowns.
- Each organization's Director of operations provides guidance during their daily operations meetings.
- Operations Directors play a crucial role in providing feedback during the approval process of the assessments, thereby enhancing the delivery of quality assessments.
- Each organization's leadership (Assistant Managers (AMs), Deputy AMs, and directors) provides feedback and guidance during their monthly MRBs.
- Completed the FR triennial assessment and continuously used the data to improve the FR program. Some of the improvements include: making peer review for assessments mandatory, revising the FR procedure to clarify stop work authority, and providing additional training on the Occurrence Reporting and Processing System database.
- Staffed regularly scheduled Readiness Assessments (RAs) with FRs from across the SR EM mission areas to ensure FRs gain experience in facilities other than that to which they are normally assigned.

4. FRs and Their Management Are Tracking Safety Issues and Reviewing Them to Identify Trends

- Revised the FR Implementation Procedure for guidance that ensured trending analyses were conducted and documented quarterly to identify targeted assessments for high-risk areas with trending activities.
- Annual review of quarterly analyses at a programmatic level to verify if site-targeted assessments are needed.
- Scheduled an effectiveness review of the FR Implementation Procedure during the second quarter of fiscal year (FY) 2025.
- During monthly MRB meetings, the management team and staff discuss trends, facilities/operations that require additional FR oversight or potential saturation reviews.

5. DOE-SR Is Prioritizing Higher Risk Areas for FR Safety Oversight

- Organizational leadership (AMs, Deputy AMs, Engineering Director, and Operations Directors) provides guidance on the high-risk activities needing oversight (e.g., during the morning Operations status meeting).

- DOE-SROO staff attend the contractor Plan of the Week, shift turnover, and scheduling meetings to determine activities that need FR oversight.
- Conducted multiple RAs that supported prioritizing oversight for high or new-risk activities inside those facilities.
- Leveraged lessons learned from the Defense Waste Processing Facility saturation review to establish a quarterly facility review program.

DOE-SROO will continue to update your team on its FR program's continuous improvement actions to ensure it maintains an effective program that supports the safe operation of its facilities to protect its workers, the public, and the environment. An effectiveness review of the FR Implementation Procedure is scheduled during the second quarter of FY 2025.