



Department of Energy

Washington, DC 20585

June 21, 2024

The Honorable Joyce L. Connery
Chair, Defense Nuclear Facilities Safety Board
625 Indiana NW, Suite 700
Washington, DC 20004

Dear Chair Connery:

On December 21, 2023, the Department of Energy (DOE or Department) transmitted to you the Office of Enterprise Assessments (EA) report entitled, *Independent Review of Safety Basis Development Processes at Defense Nuclear Facilities*. With this follow up letter, DOE documents our actions in response to the results of the EA report and in accordance with Milestone 5.4.3. of the Department's Implementation Plan (IP) for Recommendation 2020-1, *Nuclear Safety Requirements*.

The December 2023 report includes recommendation from EA for both the DOE Program Offices, Field Offices, and Office of Environment, Health, Safety and Security (EHSS). EA recommends that DOE Program Offices and Field Offices ensure that protocols to formally manage the safety basis change process are established and followed. To improve effectiveness, EA recommends that the protocols should include common project management practices as identified in the report.

Additionally, EA recommends that EHSS include guidance in DOE Standard (STD) 1104-2016, *Review and Approval of Nuclear Facility Safety Basis and Safety Design Basis Documents*, or other documentation as appropriate, on how to handle annual update submittals that do not include changes requiring DOE approval. EA recommends that this guidance should include details as identified in the report.

DOE Office of Environment, Health, Safety and Security

In response to EA's recommendations regarding the annual update submittals, the Office of Nuclear Safety Basis and Facility Design (EHSS-31), within EHSS, has evaluated EA's recommendations and suggested guidance as part of the ongoing revision to DOE-STD-1104-2016 and the development of DOE Order (O) 421.1, *Nuclear Safety Basis*. Where appropriate, both drafts currently propose guidance related to the topics recommended in the EA report. DOE-STD-1104 and DOE O 421.1 are still under development.

DOE Program Offices and Field Offices

The DOE Offices of Environmental Management (EM), Science (SC), and the National Nuclear Security Administration (NNSA) are taking proactive steps to ensure that protocols to formally manage safety basis change processes at defense nuclear facilities are established and followed. Program Office leadership routinely interfaces with Field Offices to ensure that safety basis

changes follow common project management processes, including those identified in the EA report. Additionally, the Program Office Central Technical Authorities or Cognizant Secretarial Officer for Safety for NNSA, through their periodic reviews of site/field offices, are committed to continuous improvement by verifying that the EA notable practices and recommendations are being implemented, where appropriate.

If you or your staff have any questions, you may contact me at (301) 903-7440.

Sincerely,

A handwritten signature in black ink, appearing to read "Garrett Smith", written in a cursive style.

Garrett Smith
Director, Office of Nuclear Safety
Office of Environment, Health, Safety, and Security
Responsible Manager, Recommendation 2020-1,
Nuclear Safety Requirements