organization. Manufacturing does its own self-assessments, but there are other groups in BWXT Pantex that are looking at them also.

DR. MATTHEWS: Okay. Thank you.

CHAIRMAN CONWAY: In view of the time is moving on, I may send you some questions that I have. But in order to save some time, I thank both of you for being here. And we may also have after we read the transcript additional questions.

Thank you.

MR. GLENN: Thank you.

CHAIRMAN CONWAY: Okay. We'll, turn to you, Mr. William J. Brumley, Manager of the Y-12 Site Office.

MR. BRUMLEY: Thank you, sir.

Mr. Chairman, if you would prefer, I would be happy to just summarize my brief statement and it be submitted for the record?

CHAIRMAN CONWAY: Fine. Let's do it that way. It will be in the record as read in whole. Yes.

MR. BRUMLEY: Thank you.

Thanks for this opportunity to provide testimony on our process for contractor oversight and our role in ensuring the mission assigned to NNSA are effectively accomplished.
I understand the Board has some particular question on the status of our oversight and our personnel, and I’ll briefly summarize that for you.

In January of 2001, YSO [Y-12 Site Office] established a Management System Description that provides a comprehensive basis of our description of our responsibilities and processes. It was accompanied by a FRAM [Functions, Responsibilities, and Authorities Manual] in April of 2000. And that’s the basic documentation of how we comply with the DOE Policies 411 [DOE P411.1, Safety Management Functions, Responsibilities, and Authorities for Nuclear Facilities and Activities] and 450 [DOE P450.1, Environment, Safety, and Health Policy for the DOE Complex]. We actually have a strategic plan with the specific goals and objectives traceable to individuals.

Our oversight activities. YSO has established an effective program of oversight. Fundamentally, it is based on Specification And Requirements Identification Documents, S/RIDs, which are tied to the contract. We have some fundamental assessment, base assessments, where we ensure that our federal responsibilities are met. Reactive assessments and then site management and contract
administration assessments where we improve our processes.

All of our assessments are scheduled in a master assessments plan issued on an annual basis that ensures all functional layers are covered over a three year period. And we have performance indicators in place to ensure our performance against that plan.

We have focused very heavily on the FR program in conducting walk-through assessments, all of those are scheduled and monitored as part of PIs [Performance Indicator].

We have a management walk-through program where we emphasize "field time." My personal goal is five percent. I don’t always make that.

But again, all of those schedules are monitored and tracked as part of a PI program.

Individual assessments are documented on what we call an IAR [Individual Assessment Report]. Those are collected monthly, analyzed along with other input, other assessments, contractor assessments occurrence for the month. Those are then compiled, reviewed, peer reviewed by our group of assistant managers and are summarized in a monthly assessment report that is provided to the contractor. That’s provided as the basis of roll up of issues where
they’ve been tracked and followed to closure.

We also have a process we call our PAM [Performance Analysis Matrix] where we look at a number of functional areas based on risk and contractor performance. They cover a full range of contractor activities. It is basically a "stop light" chart of blue exceeding expectation, green meets, yellow. It’s a very useful tool in relating where we see issues with the contractor.

Each of these areas in our Performance Assessment Matrix is linked back to the annual performance evaluation plan, which again ties back to the contract. And at the final end of the year, that PAM is the basis for our performance evaluation report.

In terms of the Y-12 self-assessment program, again, that is in place and documented. The process is intended to show that YSO compliance with our line management and oversight responsibilities as stipulated in DOE Policy 450.5

We’ll take credit. In April of 2000, the OA assessment concluded that YSO has established the essential elements of the effective self-assessment program. We are currently helping Jim Mangeno with establishing that as a policy for NNSA.

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We do have in place a series of performance indicators for the office to look at all our areas and not just safety, but security and business management as well. We believe these performance measures provide a measure of the overall effectiveness of the Site Office. It’s also used as a measure to communicate our performance to Headquarters.

In terms of YSO technical staffing, we have a Workforce Analysis and Staffing Plan that defines our current level. The plan is a living document. It’s updated annually, but actually it gets changed more often. Progress towards recruiting and filling is tracked in a weekly management system meeting.

Our initial efforts to determine that the level of staff necessary to operate the office the way we would ideally like to do it would be 96 individuals. We reevaluated that and determined that this office could be managed with a staff of 80. Our current position remains the same.

We have not been able to staff up to 80 due to the NNSA re-organization and some personnel practices to ensure we protect people who may be excessed to other sites. That hiring freeze is now
off, and we’ve made some recent selections and several more in process.

I personally have placed a very strong emphasizes on our technical qualification program. Everyone who is qualified, every FR I participated in a walk around, final qualification with that. Our requalification program is not just for FR, but the whole tech quals programs. Currently 83 percent of the YSO technical personnel are fully qualified, and none are overdue.

Specifically in the Facility Rep program we have nine of nine FRs fully qualified. Four of our five -- four on AB engineers are all fully qualified, and we’re currently short one AB engineer, and that will be posted shortly. Five of our six safety system oversight engineers are fully qualified. The one engineer which is missing was the instrument and control. Electrical engineer that will be posted very shortly.

To talk just a little bit about our line oversight and Contractor Assurance System. As Federal employees, we cannot abdicate our responsibility as owner of the Y-12 Plant. There always be a base federal oversight program to enable us to meet our federal responsibilities, particularly in accepting
risk with respect to safety and security. We are in the process of looking at how we do that.

Currently, I see our work divided into three major categories. First is how we run the office itself. That's on personnel practices, policies, all of that. Our processes for how we define requirements and accept risk, which is in essence, the contract.

And then finally, our processes for conducting oversight which include the field assessments of our contractor performance. We believe we have to become more effective and efficient in the way we complete these activities due to:

(1) There's a continuing requirement for implementing greater responsibilities at the Site Office, as you've already noted;

(2) There are increasing requirements for security, and;

(3) And the workload is increasing at Y-12, including our modernization activities of our purification facility, our enriched uranium materials facilities, admin facilities, future enriched uranium operation, and the increasing infrastructure reduction activities that have come along.

It's our view that the small staff of YSO
cannot provide the same level of oversight that can be achieved by leveraging our assessments and the required contractor management and independent assessments. We believe that a good validated Contractor Assurance System can help us leverage our assets to actually improve our oversight. The development of the effective Contractor Assurance System starts with a common understanding of the risk -- the requirements and associated risk. That'll be a key federal role early in that process. Once the requirements have been identified, agreement is reached on the performance metrics to measure those risks. Information on the contractor efforts to evaluate their performance will be made available. The performance metrics will not eliminate federal assessments, however we believe they will enable us to reduce our efforts spent in gathering field data on contractor performance in low risk areas.

Overall, we believe that the CAS implementation, Contractor Assurance System, we could be spend more time on defining requirement and less on transitional approval of activities in the field.

To date, we have not relied on the contractor's evaluations to reduce YSO oversight. Any oversight changes that we have made have resulted from
our existing procedures for evaluating contractor performance.

Some indications that we believe that indicate the readiness for implementation of elements of the Contractor Assurance System include:

(1) Contractor organizations that are most critical of their activities. They should be holding themselves to the higher standard. Currently, the majority of organizations at Y-12 are not the most critical of their activities. YSO and independent assessments continue to identify issues and concerns which should have been identified and corrected by self-critical organization;

(2) We need to focus more on the effectiveness of contractor assessment activity in fixing problems, not just identifying them;

(3) YSO oversight processes must ensure the contractor assessments and performance metrics reflect "true data," sort of the ground truth. Our oversight process is fully developed with feedback mechanisms in place, including the PAM to provide independent measures of contractor performance. As they are developed, YSO oversight processes will have to be reviewed and potentially revised to ensure that the mechanisms are in place to validate the adequacy.
of the data in the metrics.

At Y-12 now, probably the environmental protection area is the closest to the point where we could consider implementing a Contractor Assurance System. The organization is working routinely to meet requirements, very self-critical, continues to identify work and effectively resolve issues. And there’s also a far amount of external regulation on the environmental side.

We were asked to comment briefly on the Columbia accident investigation. Y-12 is participating in that. We’ve got three teams working with BWXT. Our current activities in the Site Office including participating on the Headquarters task force, being personally led by my deputy, Ted Sherry.

In terms of corrective actions, our procedures identify responsibilities and provide processes for identifying where correction is necessary. Once it’s identified, it’s tracked and validated all the way through closure.

Very briefly in summary, I believe the actions taken by YSO in implementing an Integrated Safety Management [ISM] Program, which includes putting technically qualified staff in place with defined roles and responsibilities in a FRAM, while
implementing a detailed set of contractor oversight performance measures with an experienced and competent Facility Rep program, have given us a strong foundation to move forward with NNSA’s re-organization and contractor assurance initiatives.

I am committed to the success of this initiative. I actually anticipate little change in our current oversight role until the contractor demonstrates proven capability.

That’s a very quick highlight of what I think to be the most important points.

CHAIRMAN CONWAY: Thank you. Thank you. We’ll put your statement in, as I said, as if given in its entirety.

Dr. Eggenberger?

VICE CHAIRMAN EGGENBERGER: Yes. I believe you told me that it was your opinion that the contractor assurance system was not mature enough at this point in time for you to depend upon it for a large portion of input into your oversight?

MR. BRUMLEY: That’s correct.

VICE CHAIRMAN EGGENBERGER: And, therefore, you need to continue your oversight on a higher level than you would anticipate that you would later on?
MR. BRUMLEY: I think the total oversight and total staffing of the office will remain relatively flat. As the Contractor Assurance System matures, I believe we can spend more time on developing requirements and writing better contracts and being a better customer, and we can focus less time on actual field presence. Right now, we have indicators that indicate up to 60 percent of our time is spent conducting assessments. We believe that it may be more efficient if we could put better effort into defining the requirement, we could back off slightly on field assessments. But again, those assessments will have been supplemented and actually exceeded by what will be available in the Contractor Assurance System. However, as I said earlier, we do not propose to back off of your assessments until we see them being performed in the field.

VICE CHAIRMAN EGGENBERGER: Yes.

MR. BRUMLEY: By the contractor.

VICE CHAIRMAN EGGENBERGER: Yes. I said at Pantex that they do two things. And I believe that they do the same two things at Y-12. They do operations, and they do infrastructure-type engineering and analysis, and that the two do mesh together.
Do you have an assessment at this point in time of the ability of the contractor to do their own internal assessments on operations, number one? And number two, on the infrastructure engineering and analysis? Could you contrast the ability of the contractor to do appropriate assessments?

You've already told me that it's not where it needs to be. But could you contrast the two?

MR. BRUMLEY: We believe, and we've reported through some of our processes including our Performance Analysis Matrix process on the operation side, we see considerable opportunity for improvement by the contractor. I believe they recognize this. And part of that is because their own ability to identify issues; still, too many things happen, and too many issues are identified by others. So on the operation side, we believe significant improvement in their ability to assess themselves is still required.

On the engineering side, I guess one point of data would be the engineering effort to submit all of the documents required for the 830 [10 CFR 830] review, all of the SARs [Safety Analysis Reports] that had been presented. In general, those were of good quality. There was some issues where we thought the engineering could have been a little more inquisitive.
and provided better information in support.

I would have --

VICE CHAIRMAN EGGENBERGER: Well, let's use an example of a new facility. The HEUMF (Highly Enriched Uranium Material Facility) which was to be installed at the site; can you give me an idea of your assessment of how they're able to oversee that particular facility?

MR. BRUMLEY: We believe it's adequate, and they'll be able to do a good job. We're seeing early performance on the purification prototype, which is a facility under -- we no longer call it prototype -- a purification facility which is under construction, and the technical issues seemed to have been addressed and resolved in that. So I'm not sure I understand exactly where you're heading with the question.

VICE CHAIRMAN EGGENBERGER: Well, we've had two starts on the project. It's a very complex project in that the dependence and interdependence of nuclear safety and security is a very difficult problem.

MR. BRUMLEY: Oh.

VICE CHAIRMAN EGGENBERGER: And those I would expect that you would say that they don't have
all the facility to work with those, and that they’d
have to maybe go on -- I’m trying to understand where
we’re missing capabilities for performing oversight
and seeing that things are done properly. And then my
next question was: how is your organization with
people that do infrastructure and its ability to
oversee it?

MR. BRUMLEY: I am very pleased with the
number and quality of the staff I have on board today.
Everyone would like more. We clearly do not have nor
would propose to maintain on staff subject matter
experts. For example, in seismic. I believe it’s
important that there be a technical base either in
Headquarters or the Service Center where we can draw
on for people like Jeff Kimball. It wouldn’t make
sense for me to replicate that capability at each of
the Site Offices, for example.

But generally within the Site Office, I’m
pleased with it.

VICE CHAIRMAN EGGENBERGER: But also let
me push on that just a little bit more. Let’s say you
and I come up with a list of people that would be
necessary in Headquarters to satisfy you, and we’d
come up with a list of, let’s say, 33 people. All
right. And what these 33 people, and I think you’ll
agree with me, they can not just sit in their office
and wait for the telephone ring.

For example, you used the seismic expert.
Since you’re not a seismic expert, you may not know
the dirty laundry when you see it. So do you not need
an organization in Headquarters which is an active
organization that you allow to come in and look at
what you’re doing to see what assistance they can
provide you that’s in the best interests of the
Department? Wouldn’t that be something that would be
useful to you in these myriad of disciplines that you
and I just defined as necessary?

MR. BRUMLEY: Absolutely. It is absolutely
critical that Site Offices have the ability to access
this technical expertise. It could be done by a group
of experts in Headquarters. It could also be done on
a limited basis by contracting. If we need to go out
and hire an expert for a given period of time.

I think on something like seismic that
has, you know, complex-wide implications, I think that
kind of expertise probably should be either in
Headquarters or a Service Center providing that
support to the complex.

VICE CHAIRMAN EGGENBERGER: But my issue
of an organization that is active, it is important to
me. One, it gets their nose in your business and knows that you are working on project A and assures you that you need to look at this, because really you’re not the expert in this, and that this whole organization could help you. Wouldn’t make things-- it would prevent bad starts and things like that?

MR. BRUMLEY: Absolutely. And I see two roles if you look at it in that oversight. One could be a source of day-to-day information --

VICE CHAIRMAN EGGENBERGER: Yes.

MR. BRUMLEY: -- on specific topical areas. We have no hesitancy in bringing folks in like Jerry McKamy to help us with safety on a periodic basis.

VICE CHAIRMAN EGGENBERGER: Yes.

MR. BRUMLEY: I also think it’s important that on some periodic basis somebody come take a look external to the Site Office and tell us are we doing the job that we say we’re doing in our processes and procedures. Fundamentally, obviously, we’re going to do what we think is right. But if we have a blind spot and don’t know it, having external people come in and look at us is very valuable to us.

VICE CHAIRMAN EGGENBERGER: Thank you.

CHAIRMAN CONWAY: Dr. Mansfield?
DR. MANSFIELD: One or two questions along the same lines that I asked the previous witnesses. Based again on ORPS reports and discussions with our Site Representative. There have been occasions of -- give occasions of Plant practice that should have been caught quickly because the evidence piled up and in some cases definitely piled up. I mean, and a good example is the combustibles even under electrical panels in the E Wing [a Y-12 facility]. Who would you have expected to find that and get it fixed? The Site Manager? The building manager? The Site Manager? You? Your Site Rep? Who?

MR. BRUMLEY: Clearly those kind of activities we would ideally, the contractor is part of a routine assessment program and their own facility processes would be identifying those things.

DR. MANSFIELD: Yes.

MR. BRUMLEY: It doesn't always happen.

DR. MANSFIELD: And then this question then is for Mr. Ruddy, what steps do you take to make it happen?

MR. RUDDY: Well, in the example of housekeeping, about 2½ years we instituted on a limited basis housekeeping in the non-nuclear part of
the Plant, what we call the east end of the Plant. And it worked successfully. But we had these long terms issues like the basement of E Wing and some of the other areas.

I think in Dr. Matthews' last trip, he saw significant improvement in the care of E Wing, but was quick to point out that there were other areas that could use the same kind of care and feeding.

What we're doing right now is we're implementing a site-wide program for housekeeping with standards to be applied in every area. One of the things that we've found is that by communicating standards to people in areas like housekeeping -- I mean it's very clear for nuclear criticality what our standards are. And even in those cases we do have occasional deviations from the approved process, or there are controls that we have. But in things like housekeeping, it becomes kind of a judgment by the eye. And we've had a lot of people go through there and kind of judge well this thing isn't up to snuff. But, frankly, to the people who live there and had to deal with it, because they didn't have a standard to work to, they couldn't judge and be self-regulating.

And so that's kind of our approach in the area of contractor assurance. To create standards and
communicate them so that there is an accountability and a way to measure either your progress or your attainment of an acceptable level of performance.

DR. MANSFIELD: So we would expect that we review your CAS, that standard setting and at least some level of inspection to make sure the standards are met --

MR. RUDDY: Absolutely.

DR. MANSFIELD: -- are going to be a regular part?

MR. RUDDY: Absolutely. And in my comments I’ll show you how we put standard and metrics into our --

DR. MANSFIELD: It’s not just a question of cosmetic housecleaning. I mean, there are definitely safety issues involved. Another one is the DU [depleted uranium] chip accumulation in 92-04 that was, surprisingly, kind of unknown. The potential pyrophoricity of things -- of the chips accumulations. They’d just sort of been forgotten.

MR. RUDDY: Well, once again, I would trace that back to specific and clear standards for that.

DR. MANSFIELD: Yes.

MR. RUDDY: We tend, especially in these
older sites, to do management by oversight. And you have to have a fundamental process that ensures the quality the first time so that your oversight is looking for adjustments to those standards and not fundamentally putting the quality in. If we want for Dr. Matthews to come to our site and tell us which areas need to be cleaned up and which don’t, I mean we’re never going to get there. And that is fundamental to the responsibility that’s on our shoulders as the contractor.

DR. MANSFIELD: I agree. I agree.

Since the standards and their application are complicated -- very complicated in a plant, are important to you staying within your safety basis, will you -- this question is for Mr. Brumley -- will you take a particular interest in reviewing standards and their completeness for the purpose of staying within the safety basis?

And my second question, you know it’s coming already, does anybody at Headquarters care?

MR. BRUMLEY: To the first part, as I indicated early in testimony, as part of this Contractor Assurance System, the very first that we have to agree upon with the contractor are the requirements or standards, whatever you want to call
them, and the associated risk associated with compliance, the Site Office has to fundamentally be on board with that, or it doesn’t make sense for the contractor to go any further. They’ll be measuring to the wrong standard.

In terms, I believe Headquarters does care but they’ve very limited numbers of people there, and I don’t need to reiterate to you the people that have left.

DR. MANSFIELD: Mr. Chairman, this is exactly the kind of incipient systematic weakness in the control of activities at DOE that we’ve often discussed.

Thank you.

CHAIRMAN CONWAY: Dr. Matthews?

DR. MATTHEWS: Yes. I’d like to get your views on the new roles that you have as risk acceptance official and contracting officer. It would seem to be pretty significant changes in your way of doing business at the Site Offices.

As you know, where I want to go is: you have these conflicting responsibilities, which we’ve all lived with, how you get to the decision or how you balance priorities? So let me ask the question a little differently than I did before. What in terms
of safety risk keep you awake at night; what two or three things keep you awake at night? And then what two or three things in terms of programmatic deliverables keep you awake at night? And when they compete for resources, how do you make that decision, and how do you quantify those risks?

MR. BRUMLEY: I think that you said two or three, and I'll keep it to two. I think probably the two things that I worry about most from a safety perspective is fire. We have an old facility. If you look, and I'm sure you have, at our Safety Analysis Reports that have been in, fire tends to be the dominant hazard that we have to mitigate. And, again, the safety related to that is release of materials, both radiological and nonradiological. Those tend to be the dominant scenarios we worry about.

The other risk is exposure of people to beryllium. That is an ongoing health and safety issue. It is currently within the standards, but the standards are ever tightening.

And those are probably the two issues I worry about.

You may wonder why I don't mention criticality safety, because our business is highly enriched uranium, and when that's it, you can't
separate security from safety from operation. But the
crit safety program is actually very mature. It has
been reviewed by a number of outside independents. We
continue to get reports of numbers, and I won’t say
significant numbers of crit safety deficiencies or
notifications, but they tend to be at the low level,
which tells me the meter is working and that program
remains fairly healthy. It is, indeed, a predominant
hazard, but it probably better controlled than the
other ones. So we worry about it, but that’s a problem
not top on my list.

I would also say at Y-12, a major safety
is our ability to protect material. One of the most
unsafe things they can do is not protect SNM [special
nuclear material]. So security in my mind at Y-12 is
not independent from safety.

And the other part was -- the second part?

DR. MATTHEWS: As your contracting officer
responsibility, what problem things keep you awake at
night that aren’t going to get delivered?

MR. BRUMLEY: The Y-12 Site Office had
what I believe was actually a significant advantage
perhaps to the other site offices, in that when NNSA
was first stood up, we were part of the Oak Ridge
Operation’s Office, and it brought into play the
double hat scenario with the Oak Ridge manager. So the Y-12 Site Office was stood up as an independent entity reporting to Headquarters about 18 months ahead of the rest of the complex. That required us to assume contracting officer authority earlier than others.

In terms of balancing those program risks, fundamentally all of the work that’s authorized through the Site Office is done so by a series of WADs [Work Authorization Documents]. And they tend to be fairly specific as to what work does and doesn’t get done. Any change to that that affects a Work Authorization Document, goes through a change control board on the contractor side and the Federal side. And prior to that change being authorized, it has input from both the safety and security and technical folks on my staff.

We really want to know is when we’re focusing efforts on task A in a zero sum game, generally it means something doesn’t get done someplace else. And we like to make sure we understand exactly what is not going to get done when we have to focus on the other task. But fundamentally, the process as a change control board includes input from all of my staff before we authorize a change.
DR. MATTHEWS: Okay. Just to follow up, though, then that balancing act of risk has to, obviously, translate into a contract somehow. Can you explain how your contract whole performance measures hold your contractor accountable for the safety versus productivity issues? Are there measures in there that are explicit in those things?

MR. BRUMLEY: Absolutely. In terms of the contract and rewarding the contractor, there are two basic areas within the fee process. One are PBIs [performance based incentives]. The vast majority of the production items are in there in terms of delivering components on a certain schedule. We can also incentivize any safety program or plan, or facility mod, or certain safety projects can be incentivized. But those tend to be very discrete deliverables.

The other site of our assurance process includes, is what I referred to earlier, as our Performance Analysis Matrix, which looks at the functional areas, whether it's red crit safety, con ops. And that in terms of performance is translated back to the fee which the contractor earns.

And a specific example was on one of the items having to do with draining of the columns in
9206 [a Y-12 facility], which overall is a very successful effort in risk reduction activity. There was some areas where we had some concern about the processes the contractor followed, and we made a slight deduction to that PBI.

DR. MATTHEWS: Thank you.

CHAIRMAN CONWAY: Okay. One question I'd have, how close do you interface with Pantex with the site manager at Pantex? You have some interface with him, but do you have close relations with him at all?

MR. BRUMLEY: It's probably -- yes. If there are issues where we need support out of Pantex or vice versa, there's no reluctance for me to call Dan or Dan to call me.

CHAIRMAN CONWAY: Because we've had examples in the past, one particular one that comes to my mind, where a safety matter was discovered, if you will, or recognized at Y-12. And was not based back down to Pantex. Nor, for that matter even, apparently at the Los Alamos Laboratory. So this kind of separation of little fiefdoms is always a little worrisome. So that's what I had in mind if the safety problems developed, obviously you'd go out--

MR. BRUMLEY: Does this have to do with some bolts?
CHAIRMAN CONWAY: No. No. No. This was something having to do with the sign that was up. In any event, it came to our attention that there was a breakdown within the DOE organizations on a safety matter, an important one.

MR. BRUMLEY: Being cryptic, I believe I understand the issue you’re talking about.

CHAIRMAN CONWAY: So that to me stresses the importance of within the community, the nuclear weapons community, and that includes the Laboratories and yourselves. There’s an importance of the community itself, make sure that they know what’s going on.

MR. BRUMLEY: Yes. I can’t agree more.

DR. MANSFIELD: Could I comment on this? That was found, but it just took a long, long time. It was found.

CHAIRMAN CONWAY: Do you want to say something, Jim?

MR. McCONNELL: One quick question. You noted that the Y-12 Site Office had a benefit of being established 18 months earlier than the rest of the semi-autonomous site offices. Now, on the other side of that coin, the Service Center is comprised of the people that were from three operations offices, none
of which had any responsibility for Y-12. So the people that populate the Service Center didn’t come from experiences that were -- they don’t come with experience at the Y-12 Plant.

So my question is what is the level of support that you get to augment your 80 people from the Service Center, and are the skills and abilities of the people at the Service Center tuned to the needs of the safety issues at Y-12 since there weren’t any people out of Oak Ridge now in the Service Center?

MR. BRUMLEY: The Y-12 Site Office has in place a formal service arrangement with the Oak Ridge Operations Office to define the relationship. In many ways they are our service center, particularly with respect currently to financial matters, the allotment process and our HR [Human Relations] authority still goes through Oak Ridge.

We do not depend heavily at this point on either Oak Ridge or the Service Center for technical expertise to support operations at Y-12.

CHAIRMAN CONWAY: Okay. Thank you.

Mr. Dennis Ruddy, General Manager of BWXT at Y-12.

And your prepared statements runs 27 pages. I’d like to put it in the record --