

October 23, 2000

The Honorable T. J. Glauthier
Deputy Secretary of Energy
1000 Independence Avenue, SW
Washington, DC 20585-1000

Dear Mr. Glauthier:

The Defense Nuclear Facilities Safety Board (Board) has reviewed the report, *Department of Energy Quality Assurance for Safety-Related Software at the Defense Nuclear Facilities*, which was transmitted by your October 2, 2000 letter in response to the Board's January 20, 2000 reporting requirement. The Board acknowledges the effort by the Department of Energy (DOE) to identify actions to resolve issues identified in the Board's staff report DNFSB/TECH-25, *Quality Assurance for Safety-Related Software at Department of Energy Defense Nuclear Facilities*. However, the Board believes that the following major deficiencies in the plan need to be addressed:

- ! The proposed Notice may be premature since it is planned to be issued without the benefit of the detailed analysis of deficiencies in the directives system (including implementing guidance) and implementation in the field which will not be completed until a later date.
- ! Software quality assurance (SQA) needs to be addressed within the context of the overall quality assurance program for DOE's defense nuclear facilities, and the Notice may detract from this objective. This is especially important now that DOE has published revisions to 10 CFR 830, *Nuclear Safety Management*, which now include both safety basis and quality assurance provisions.
- ! The proposed Safety Analysis Software Group needs to be brought to bear on all of the proposed actions at the very earliest opportunity.
- ! The funding and organizational responsibilities to institutionalize SQA corrective actions at the headquarters level need to be addressed.

The Board's staff met with DOE's staff to discuss the above listed concerns, and others. The Board encourages continued discussions before finalizing DOE's action plan.

Sincerely,

John T. Conway
Chairman

c: Mr. Mark B. Whitaker, Jr.