

November 4, 2002

The Honorable Spencer Abraham
Secretary of Energy
1000 Independence Avenue, SW
Washington, DC 20585-1000

Dear Secretary Abraham:

Since the Defense Nuclear Facilities Safety Board (Board) issued Recommendation 95-2, *Safety Management*, and published DNFSB/TECH-16, *Integrated Safety Management*, the Board has been stressing the need to integrate more closely various hazard and safety analyses. The integration of activities supporting the preparation of Documented Safety Analyses, emergency preparedness hazard assessments, fire hazard analyses, and environmental impact statements would increase consistency, efficiency, and effectiveness in the development of safety controls. Such integration has proven to be a difficult endeavor. Several letters from the Board—dated January 15, 2002; April 30, 2001; March 29, 2001; and January 8, 2001—have pointed out instances in which the lack of such integration at several Department of Energy (DOE) sites has potentially degraded the authorization bases of facilities at those sites.

The Board is aware of the recent development of a proposed DOE Handbook—*Integration of Multiple Hazard Analysis Requirements and Activities*. Development of this guidance is a commendable effort that has the potential to address the Board's concerns. However, while the current version may be of some benefit in performing hazard and safety analyses, a more comprehensive document in the form of a DOE Guide or Manual is appropriate in the future. In its current form, the handbook lacks the detailed information in certain areas to ensure the comprehensive integration of hazards analyses and the resulting controls. The Board's staff recently provided comments on the draft document, including general comments identifying areas where detailed information is lacking.

The Board would like to be kept informed of your activities and initiatives aimed at improving the integration of hazard analyses.

Sincerely,

John T. Conway
Chairman

c: The Honorable Beverly Ann Cook
Mr. Mark B. Whitaker, Jr.