

January 8, 1999

The Honorable Bill Richardson
Secretary of Energy
1000 Independence Avenue, SW
Washington, DC 20585-0104

Dear Secretary Richardson:

The Defense Nuclear Facilities Safety Board (Board) and its staff have been following the efforts of the Department of Energy (DOE) and its contractors to address potential problems in microprocessor-based systems because of year 2000 date issues. Observations from recent staff reviews of the year 2000 programs at Lawrence Livermore National Laboratory and the Rocky Flats Environmental Technology Site are enclosed for your consideration. Staff observations of the Oak Ridge year 2000 program were forwarded to DOE on November 24, 1998.

The Board is concerned that DOE has provided inadequate direction to the operators of its defense nuclear facilities with regard to evaluating safety-related systems for year 2000 compliance. In accordance with the direction from DOE headquarters, systems classified as mission-essential receive the highest priority and the closest scrutiny by headquarters. However, the initial definition of mission-essential systems did not specifically address the safety significance of equipment and was interpreted by many sites to apply to such systems as business management and payroll. For many sites, systems that protect the health and safety of the public are not classified as mission-essential. As a result, efforts to bring these systems into compliance receive less scrutiny and review than efforts directed toward certain business systems, which, though important to DOE's mission, do not have the potential for immediate impact on public health and safety as do the safety-related systems.

Although DOE should continue with current plans for mission-essential systems, the Board is concerned that the lack of emphasis on safety-related systems on the part of DOE headquarters may be encouraging many DOE sites to expend scarce resources on bringing business systems into compliance as soon as possible at the expense of similar efforts for important safety-related systems. Therefore, pursuant to 42 U.S.C. § 2286b(d) the Board requests DOE to report on the status of safety-related equipment evaluations for year 2000 compliance at all defense nuclear facilities as detailed in Enclosure 1.

Sincerely,

John T. Conway
Chairman

c: Mr. Mark B. Whitaker, Jr.
Ms. Jesse Roberson
Dr. James Turner

Enclosures

Enclosure 1

Reporting Requirements on Year 2000 Compliance for Safety-Related Systems at the Department of Energy's Defense Nuclear Facilities

February 15, 1999

- Identification of safety-related systems that may have year 2000 compliance issues
- Schedule for remediation, testing, and independent verification and validation

March 31, 1999

- Update on progress for completing year 2000 program for the safety systems that have been identified

April 30, 1999

- Status of continuity and contingency plans for safety-related systems and external effects that may compromise safety-related systems

DEFENSE NUCLEAR FACILITIES SAFETY BOARD

Staff Issue Report

November 13, 1998

MEMORANDUM FOR: G. W. Cunningham, Technical Director

COPIES: Board Members

FROM: W. White

SUBJECT: Year 2000 Compliance for Safety-Related, Microprocessor-Based Systems at the Rocky Flats Environmental Technology Site

This memorandum documents an October 26–28, 1998, review of the year 2000 compliance status for safety-related systems at the Rocky Flats Environmental Technology Site (RFETS) by the staff of the Defense Nuclear Facilities Safety Board (Board). Although the program at RFETS appears adequate to address the year 2000 problem, it may be difficult for the site to fully-implement all phases of the program in a timely manner. The current schedule for completing the program for many safety-related systems extends to September 1999, which is well beyond the March 31, 1999, deadline established by the Department of Energy (DOE) for mission-essential systems. The lack of emphasis being given by DOE Headquarters may be encouraging RFETS and other DOE sites to expend scarce resources to bring business systems into compliance as soon as possible at the expense of similar efforts for important safety-related systems.

Awareness and Assessment. The RFETS year 2000 program is organized under the oversight of the chief information officers for the DOE Rocky Flats Field Office (RFFO) and Kaiser-Hill (KH), but it includes significant support from the relevant KH line organizations. Systems and equipment are being assessed in two phases at RFETS. First is the equipment assessment phase where plant personnel walk through and identify components that have potential year 2000 compliance issues. A second assessment is then conducted from the systems level to help ensure that all equipment with potential year 2000 compatibility problems has been identified. Personnel conducting these assessments have received extensive training in identifying equipment with potential compliance problems. This dual assessment approach, if properly implemented with appropriately-trained personnel, should identify most, if not all, equipment with potential problems.

Remediation, Testing and Validation. Systems identified as having potential year 2000 compliance problems are tracked by the RFETS year 2000 project in one of three different categories: mission-essential, Rocky Flats-critical, or Rocky Flats-noncritical. The categorization of some systems as Rocky Flats-critical was necessary, in part, because the DOE definition of mission-essential systems does not necessarily include several types of important systems, such as

those necessary to protect public and worker health and safety. The year 2000 compliance of any system identified as mission-essential or Rocky Flats-critical will be independently verified and validated, and the results of the verification and validation will be fully documented.

The program in place at RFETS for testing and validation of mission-essential and Rocky Flats-critical systems appears to be very aggressive and well-planned; however, it may be difficult for

DOE/RFFO and KH to find the time and resources necessary to implement appropriate remediation, verification, and validation programs for all noncompliant equipment before 2000. Few, if any, significant verification and validation efforts have been completed to date. While RFETS expects to meet the March 31, 1999, deadline for mission-essential systems, the verification and validation of many of the systems identified as Rocky Flats-critical is not currently scheduled until September 1999. Many of these Rocky Flats-critical systems (such as the fire detection system and the life safety/disaster warning system) are safety-related, and the staff is concerned that any slips in the schedule for bringing these systems into compliance may have safety implications.

Contingency Planning. As it is possible that every non-compliant system with health and safety impact may not be identified or successfully upgraded before the year 2000, appropriate contingency planning will be essential to ensure safe operations during the transition to the year 2000. RFETS appears to be identifying appropriate compensatory measures necessary to ensure safe operations. These measures range from encouraging operators to watch carefully for possible problems during certain critical dates to actually limiting operations on those dates. Specific compensatory measures will also need to be developed as part of the contingency plans for systems that are known to have year 2000 compliance problems and that cannot be successfully upgraded before January 2000. Although most specific plans and procedures have not yet been developed, RFETS intends to have all necessary plans and procedures in place before 2000.

Staff Path Forward. The staff will follow up with RFETS personnel to further evaluate their progress and performance in assessing, upgrading, testing, and validating plant equipment that is not known to be year 2000 compliant. The staff will continue conducting similar reviews at other DOE sites to assess the overall performance of DOE in assessing the year 2000 compliance of safety-related equipment in the defense nuclear complex.