

Joyce L. Connery, Chair
Thomas A. Summers, Vice Chair
Patricia L. Lee

**DEFENSE NUCLEAR FACILITIES
SAFETY BOARD**

Washington, DC 20004-2901



December 17, 2024

The Honorable Jennifer Granholm
Secretary of Energy
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585-1000

Dear Secretary Granholm:

The Defense Nuclear Facilities Safety Board (Board) reviewed the Department of Energy's (DOE) revised directive, DOE Order 151.1E, *Comprehensive Emergency Management System*. DOE Order 151.1E retains improvements resulting from Board Recommendation 2014-1, *Emergency Preparedness and Response*, and clarifies several requirements. Implementation of DOE Order 151.1E will benefit emergency preparedness and response across the defense nuclear complex.

However, the Board is concerned by the National Nuclear Security Administration (NNSA) Administrator's memorandum dated September 18, 2023, which advised NNSA field office managers to delegate to their contractors the approvals of revisions to some emergency program documents, including all-hazards surveys, emergency planning hazards assessments, and emergency exercise plans. The Board considers this guidance to be inadvisable and inconsistent with DOE Order 450.2, *Integrated Safety Management*, which states, "DOE's safety management responsibilities for ensuring adequate protection and safe operations must be met by DOE line management and cannot be delegated to contractors." All-hazards surveys and emergency planning hazards assessments establish the technical planning basis for emergency action levels, protective actions, and emergency planning zones. Emergency exercise plans define the scope of testing and validating emergency plans.

The Board urges NNSA to issue revised guidance to ensure that emergency program documents that affect safety at defense nuclear facilities receive federal review and approval consistent with DOE Order 450.2. Further, the Board advises the Department to update DOE Order 151.1E to codify this guidance at the soonest opportunity.

Sincerely,

A handwritten signature in black ink, reading "Joyce L. Connery".

Joyce L. Connery
Chair

- c: The Honorable Jill Hruby, Administrator, NNSA
 - Ms. Candice Robertson, Senior Advisor, DOE Office of Environmental Management
 - Mr. John Juskie, Associate Administrator for Emergency Management, NNSA
 - Mr. Michael Mikolanis, Manager, NNSA Savannah River Field Office
 - Mr. Theodore Wyka, Manager, NNSA Los Alamos Field Office
 - Dr. Daryl Hauck, Manager, NNSA Sandia Field Office
 - Ms. Betty Huck, Acting Manager, NNSA Nevada Field Office
 - Mr. Jason Armstrong, Manager, NNSA Pantex Field Office
 - Ms. Mary Helen Hitson, Manager, NNSA Y-12 Field Office
 - Ms. Janis Parenti, Manager, NNSA Livermore Field Office
 - Mr. Joe Olencz, Director, Office of the Departmental Representative to the Board