



The Deputy Secretary of Energy

Washington, DC 20585

July 12, 2007

The Honorable A.J. Eggenberger
Chairman
Defense Nuclear Facilities Safety Board
625 Indiana Avenue, NW, Suite 700
Washington, D.C. 20004

Dear Mr. Chairman:

Since I clarified expectations on this topic in December 2005, the Department of Energy (DOE) has been focused on improving processes and performance in effectively integrating safety into design of defense nuclear facilities, particularly improving early identification and resolution of safety issues.

The most significant component in our approach is setting forth clear requirements and expectations in DOE directives and standards. Accordingly, we have revised and issued DOE Order (O) 413.3A, *Program and Project Management for the Acquisition of Capital Assets*, in July 2006 and drafted DOE Standard 1189, (DOE-STD-1189), *Integration of Safety into the Design Process*, and issued it for review and comment in March 2007. Our DOE line managers are providing increased attention and oversight toward resolving safety issues associated with ongoing projects in defense nuclear facilities.

At your public meeting on Safety in Design on March 22, 2007, Mr. Glenn Podonsky made a commitment on behalf of the Department to provide the Board a summary of the Department's path forward regarding implementation issues associated with DOE-STD-1189.

Specifically we committed to:

- Identify key milestones and responsible managers for the completion of DOE-STD-1189; the guides for DOE O 413.3A; and the subsequent revision to DOE O 413.3A;
- Define how line programs will implement DOE-STD-1189 for current and emerging projects; and
- Identify how the Department will make DOE-STD-1189 a requirement for defense nuclear facilities.



Identification of Key Milestones

The RevCom comment period for draft DOE-STD-1189 began on March 28, 2007, and was closed on May 28, 2007. My staff has begun the comment resolution process. I anticipate it will take approximately six months to complete comment resolution and concurrence. Publication of DOE-STD-1189 is projected for December 2007. The eighteen supporting guides to the recently issued DOE Order 413.3A are in the development process. These guides will be completed by September 2008. During their development changes to DOE O 413.3A will be identified where additional or modified requirements are needed. DOE O 413.3A will be revised based on changes identified during the Guide development process by September 2009.

Implementation of DOE-STD-1189

In order to assess how to effectively implement DOE-STD-1189 for current line item capital projects for defense nuclear facilities, DOE line organizations will evaluate these ongoing projects no later than three months after the standard is approved. As shown in the enclosed key milestone chart, line organizations will identify affected projects and the current design stage, evaluate the current status of each project, its projected hazard category, and the associated safety issues currently identified, and establish the necessary actions for implementation. At a minimum, each line organization will take the following implementation actions based on the design stage of ongoing projects:

- For projects in the Mission Need Stage, DOE-STD-1189 will be implemented.
- For projects in the Conceptual Design Stage, DOE-STD-1189 will be implemented based on a specific evaluation of each project.
- For projects in the Preliminary Design Stage, DOE-STD-1189 will be used for the format and content for preparation of the Preliminary Safety Design Report.
- For projects in the Final Design Stage, DOE-STD-1189 will be used for the format and content for preparation of the Preliminary Documented Safety Analysis.

DOE will work with your staff to ensure that, in each of these situations, the safety issues are clearly identified and resolved to the degree feasible early in the design stage.

Making DOE-STD-1189 a Requirement for Future Defense Nuclear Facility Projects

DOE will ensure implementation by making DOE-STD-1189 a requirement of DOE Order 413.3A and its associated Contractor Requirements Document. DOE will also make conforming changes to DOE O 420.1B, *Facility Safety*, and its affected guides (DOE G 420.1-1 and DOE G 420.1-2). As previously noted, it is anticipated that changes

to DOE O 413.3A will be made to reflect new requirements identified as part of the guide development process. However, to avoid a delay in ensuring that DOE-STD-1189 is utilized with the appropriate rigor, we will make a page change to DOE O 413.3A within six months after DOE-STD-1189 is approved to make the use of DOE-STD-1189 a requirement, consistent with the description above relative to design stages, and to correct any identified errors.

I want to reiterate the Department's commitment to safety — a commitment that is a Departmental "core value" shared by Secretary Bodman and the entire senior leadership team. Enclosed is the list of key milestones and responsible managers for each of these tasks. We are maintaining a more detailed schedule of activities associated with the plan, and would be pleased to brief you on it. If you have any questions, please do not hesitate to contact me or Mark B. Whitaker, Departmental Representative to the Board, at (202) 586-1774.

Sincerely,

A handwritten signature in cursive script that reads "Clay Sell". The signature is written in black ink and includes a small dot at the end of the line.

Clay Sell

Enclosure

Enclosure

Completion of Standard 1189: John Nichols, Point of Contact

Key Milestone	Due Date
Complete RevCom Comment Period	5/28/07
Resolve Comments and complete RevCom concurrence	11/30/07
Publish Standard 1189	12/31/07
Complete conforming revisions to DOE O 420.1B, Facility Safety.	9/30/09

**Completion of DOE O 413.3A Guides and Revised DOE O 413.3A:
John Makepeace, Point of Contact**

Key Milestone	Due Date
Make Page Change to Order 413.3A to make 1189 a requirement	Six months after 1189 is approved (6/31/08)
All 413.3A guides completed	9/30/08
Order 413.3A revised	9/30/09

**Evaluation of NNSA Line Item Capital Projects for Standard 1189 Applicability:
Mike Thompson, Point of Contact**

Key Milestone	Due Date
Identification of Potentially Impacted Line Item Capital Projects	10/01/07
Establish Assessment Schedule of Impacted Projects	30 days after 1189 is approved (1/31/08)

**Evaluation of EM Line Item Capital Projects for Standard 1189 Applicability:
Dae Chung, Point of Contact**

Key Milestone	Due Date
Identification of Potentially Impacted Line Item Capital Projects	10/01/07
Establish Assessment Schedule of Impacted Projects	30 days after 1189 is approved (1/31/08)

**Evaluation of SC Line Item Capital Projects for Standard 1189 Applicability:
Carol Sohn, Point of Contact**

Key Milestone	Due Date
Identification of Potentially Impacted Line Item Capital Projects	10/01/07
Establish Assessment Schedule of Impacted Projects	30 days after 1189 is approved (1/31/08)

Evaluation of NE Line Item Capital Projects for Standard 1189 Applicability:
Richard Black, Point of Contact

Key Milestone	Due Date
Identification of Potentially Impacted Line Item Capital Projects	10/01/07
Establish Assessment Schedule of Impacted Projects	30 days after 1189 is approved (1/31/08)