DNFSB Observations
John E. Mansfield, Board Member
February 27, 2003
Topics

• Long-Standing Initiatives
• Current Issues
• DOE / DNFSB Interactions
• Expectations for 2003
Long-Standing Initiatives

- Material Stabilization and Packaging
- Safety of Weapons Complex Activities
- DOE Directives
- Integrated Safety Management
Material Stabilization and Packaging: Pu in 3013 Containers
Material Stabilization and Packaging: K-Basin Fuel
Material Stabilization and Packaging: RFETS D&D
Material Stabilization and Packaging: Opening of WIPP
Safety of Weapons Complex Activities: Pantex & SS-21
Safety of Weapons Complex Activities: LANL
Safety of Weapons Complex
Activities: LLNL Building 332
SUBJECT: PROMULGATING NUCLEAR SAFETY REQUIREMENTS

PURPOSE:
This Policy sets forth the procedural framework for promulgating nuclear safety requirements of general applicability.

SCOPE
This Policy applies to establishment of substantive requirements of general applicability adopted by the Department to protect workers, the public and the environment from radiological harm during the conduct of its nuclear activities that have the potential for significant radiological harm ("nuclear safety requirements"). This Policy does not apply to: agency actions of the Office of Naval Reactors; interactions between the Department and the Defense Nuclear Facilities Safety Board under 42 U.S.C. § 2286; actions relating to nuclear safety requirements in a particular contract; or actions described in 5 U.S.C. § 5532(b)(A) and (B).

CANCELLATION
This Policy cancels DOE P 410.1, DEVELOPING NUCLEAR SAFETY REQUIREMENTS, of 9-28-95.

PROMULGATION OF NUCLEAR SAFETY REQUIREMENTS

Compliance with Procedural Requirements
The Department is committed to complying fully with procedures established by law — including the Administrative Procedure Act, the DOE Organization Act, the National Environmental Policy Act, and the Atomic Energy Act — in developing nuclear safety requirements. Moreover, the Department is committed, as documented in DOE P 1250.1, GUIDELINES ON IMPLEMENTATION OF THE DEPARTMENT'S PUBLIC PARTICIPATION POLICY, to make public participation a fundamental component in decision-making within the Department.

Use of Notice and Comment Rulemaking
The Department will use notice and comment rulemaking to promulgate new nuclear safety requirements within the scope of this Policy. The Department also will use notice and comment rulemaking to promulgate requirements on nuclear safety issues currently covered by DOE Orders, and will issue notices of proposed rulemaking with respect to important nuclear safety requirements in existing DOE Orders as expeditiously as practicable. The use of notice and comment rulemaking will give all members of the public the opportunity for meaningful participation in the development of nuclear safety requirements.

DISTRIBUTION: All Departmental Elements

INITIATED BY: Office of General Counsel
Integrated Safety Management

- Provide Feedback and Continuous Improvement
- Define the Work Scope
- Analyze the Hazards
- Develop & Implement Hazards Controls
- Perform Work Within Controls

[Diagram showing a cycle with arrows connecting the steps]
Recent Board Initiatives

• Lab Support of Complex
• Quality Assurance
  – Software Quality Assurance
• Documented Safety Analysis
  – Administrative Controls
• Design & Construction
Lab Support of Complex: Lightning Hazard
Quality Assurance
Documented Safety Analysis
Design & Construction:
Waste Treatment Plant
DOE / DNFSB Interactions

• Amount of Board Correspondence
  – Relatively constant (60-80 letters/year)

• Reporting Requirements
  – General increase

• Recommendations
  – General decrease

• Site Representatives
Looking Forward: DOE/NNSA Initiatives

- Modernization
- Accelerated Cleanup
- NNSA Reorganization
- Directives and Oversight Policy
DNFSB

Expectations for 2003

• Progress on Ongoing & Recent Issues
• Design & Construction
• DOE Management of Cross-Cutting Issues
• Safety Controls
  – Engineered systems / backfit analysis
  – Administrative