



**The Secretary of Energy**  
Washington, DC 20585

May 4, 2004

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U.S. DEPT. OF ENERGY

The Honorable John T. Conway  
Chairman  
Defense Nuclear Facilities Safety Board  
625 Indiana Avenue, NW, Suite 700  
Washington, D.C. 20004

Dear Mr. Chairman:

The purpose of this letter is to provide a final response to your December 2, 2003, letter regarding the glovebox fire that occurred in Building 371 at the Rocky Flats Environmental Technology Site (RFETS) on May 6, 2003, and deficiencies identified in the Integrated Safety Management System.

The Department's interim response from Assistant Secretary Roberson, dated February 3, 2004, provided a Self-Assessment and Causal Analysis of the Safety Oversight Program Corrective Action Plan performed by the Rocky Flats Project Office (RFPO). An update to that Corrective Action Plan is enclosed. The update documents the current status of the actions committed to in the interim response and includes an additional action to revise the RFPO Closure Project Oversight Program. Aggressive actions have been taken by the RFPO Manager to address your concerns and those of your staff regarding Federal oversight of the contractor's work at the RFETS.

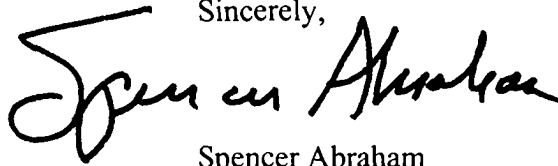
I am also enclosing an updated Comprehensive Corrective Action Plan developed by the contractor, Kaiser-Hill Company, LLC. This plan provides an in-depth review of the safety deficiencies at the site and actions that have been and are being taken to correct them. It also establishes mechanisms to ensure that safety is and remains an integral part of the RFPO's and contractor's performance as closure progress continues. The plan incorporates corrective actions deemed necessary based on a recently completed independent Integrated Safety Management System assessment. The result of this independent assessment has led to a more comprehensive and robust corrective action plan than initially envisioned.

The Department's obligation and commitment to the public and our workers is to perform work safely to minimize risk at our sites. Accelerated closure is the risk elimination path from RFETS. However, risk reduction without safety is an invitation to failure. This response is a path forward where safety is a priority. The corrective actions committed to by both RFPO and Kaiser-Hill will reinforce and strengthen the safety posture at the RFETS. Additional details on the corrective actions have been shared with your staff.



Please contact Dr. Inés Triay, Acting Chief Operating Officer, if there are follow on questions regarding the corrective actions being taken at Rocky Flats. If you, or your staff, have any questions regarding our continued closure effort at Rocky Flats, please contact me or Ms. Jessie Hill Roberson, Assistant Secretary for Environmental Management, at (202) 586-7710.

Sincerely,

A handwritten signature in black ink, appearing to read "Spencer Abraham". The signature is written in a cursive style with a large initial "S".

Spencer Abraham

Enclosures

SEPARATION

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Corrective Action Plan in Response to Self Assessment  
and Causal Analysis of Safety Oversight Program

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This Corrective Action Plan is in response to the self assessment performed by the Rocky Flats Project Office (RFPO) on its safety oversight program. The self assessment and companion causal analysis were performed in response to concerns expressed by the Defense Nuclear Facilities Safety Board (DNFSB) in a December 2, 2003 letter to the Secretary of Energy. The issues and findings documented in the self assessment support the concerns expressed by the DNFSB, and indicate programmatic weaknesses that must be addressed for the RFPO to fulfill its mission of safe closure of the Rocky Flats Environmental Technology Site. The corrective actions committed to in this plan were developed to resolve the root, direct, and contributing causes of the aforementioned weaknesses and prevent their recurrence.

This revision to the Corrective Action Plan presents the status of all actions as of March 11, 2004, includes new due dates, and an additional action. Action 1.9 assumed the Closure Project Oversight Program (CPOP) could be used as written to implement the RFPO oversight program. After further review it has been determined that the CPOP requires a substantial revision in order to provide the appropriate infrastructure for the project office. This new action is listed below as "1.9a" and the efforts to perform this action have impacted the original due dates for actions 1.10, 1.13, 1.14, 2.1, and 2.2.

No.	Action	Due Date/Status
	<b>Management and Supervision</b>	
1.1	Selection of RFPO Manager with operations and project background	Complete
1.2	Promulgate and distribute Safety and Oversight Policy.	Complete
1.3	Create and fill a Senior Safety Advisor position to serve as RFPO safety advocate.	Complete
1.4	Reorganize to achieve line management accountability for safety.	Complete
1.5	RFPO will implement a post-RIF organization with limited, but high performing individuals as supervisors.	Complete
1.6	Incorporate safety oversight responsibilities into supervisory performance expectations.	Complete
1.7	Update the RFPO Functions, Responsibilities and Authorities Manual.	Draft Completed Approval by 4/9/04
1.8	Update staff work plans to clearly identify oversight responsibilities, including expectations for direct observation of field work.	Complete
	<b>Assessment Program</b>	
1.9	Establish a team to develop a two year assessment and oversight program based upon the existing Closure Project Oversight Program (CPOP) Manual.	Complete
1.9a	Revise the Closure Project Oversight Program (CPOP) Manual to reflect the RFPO organizational structure.	4/7/04

Corrective Action Plan in Response to Self Assessment  
and Causal Analysis of Safety Oversight Program

1.10	Generate a formal assessment schedule.	Draft Completed Approval by 4/9/04
1.11	Identify an Assessment Coordinator.	Complete
1.12	Evaluate the Rocky Flats Corrective Action Tracking System (RCATS) and alternative for corrective action tracking, and make an appropriate selection.	Complete
1.13	Provide training on the Oversight and Evaluation (O&E) database to RFPO staff.	4/16/04
1.14	Issue formal guidance on O&E usage (increase scope of entries) and the expectations for performing follow-up activities and generating corresponding O&E entries.	Draft Completed Approval by 4/9/04
	<b>Quality Assurance</b>	
1.15	Host an external (EM HQ) assessment of the RFPO oversight program.	5/31/2004
1.16	Perform an internal Integrated Safety Management System assessment.	8/31/2004
	<b>Work Package Reviews</b>	
2.1	Prepare a procedure documenting the process and expectations for performing work package reviews, including a work package selection process.	Draft Completed Approval by 4/9/04
2.2	Develop a list of RFPO personnel with the appropriate background to perform work package reviews.	Completed
2.3	Work package review efforts will be included in the Monthly Safety Reviews with senior management.	3/31/2004
2.4	Formally assess the work package review effort for efficacy.	5/31/2004

SEPARATION

PAGE



March 24, 2004

04-RF-00354

Frazer R. Lockhart  
Manager  
DOE, RFPO

- Refs
- 1) John T. Conway, Chairman, DNFSB, ltr, to The Honorable Spencer Abraham, December 2, 2003
  - 2) Alan M. Parker, President & CEO, Kaiser-Hill Company, LLC, ltr AMP-001-04, to Frazer R. Lockhart, January 23, 2004
  - 3) Stephen M. Sohinki, Director, DOE Office of Price-Anderson Enforcement, ltr EA 2004 02, to Alan Parker, February 3, 2004

KAISER-HILL COMPREHENSIVE CORRECTIVE ACTION PLAN – UPDATE – AMP-008-04

Dear Frazer:

The Defense Nuclear Facilities Safety Board (the Board) requested that the Department of Energy, Rocky Flats Project Office (DOE-RFPO) provide a corrective action plan regarding how DOE and Kaiser-Hill Company, LLC (Kaiser-Hill) would address the findings documented in their referenced letter. On January 23, 2004, Kaiser-Hill provided an interim status report to the Board. That input described the major actions being taken by Kaiser-Hill in response to the concerns and issues raised by the Board. The purpose of this letter is to provide Kaiser-Hill's comprehensive response and ongoing actions to ensure that the site is closed safely.

Kaiser-Hill's comprehensive response is based on all the completion of all of the five reviews that Kaiser-Hill committed to in January. These included three independent reviews, performed by personnel from outside Kaiser-Hill, and two reviews performed by internal personnel.

- We gained substantial insight from the Independent Building 371 Glovebox 8 Fire Investigation concerning work planning, our response to events and our pursuit of corrective actions;
- An independent ISM implementation review concluded that the Kaiser-Hill ISM System is in place and implemented, implementation issues were noted in the areas of work control, fire response, and assessment of safety management programs;
- A review of our assessment programs, causal analysis and corrective action management by corporate personnel from CH2M HILL has added to our understanding of site challenges in this arena; and
- Two internal analyses of events reported under PAAA and significant events during FY03 permitted us to place our recent operating experience into perspective.

March 24, 2004  
Frazer R. Lockhart  
AMP-008-04  
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Individual findings and observations from each of these reviews have been captured and corrective actions are included in the Comprehensive Corrective Action Plan.

To ensure the systematic management of the corrective actions and their completion, I have formed the Kaiser-Hill Comprehensive Corrective Action Plan (CCAP) Task Force that includes personnel from outside to ensure an independent perspective. Working closely with the Executive Safety Review Board, this group has been tasked to:

- Ensure that the CCAP comprehensively and effectively addresses required actions;
- Coordinate validation of the effectiveness of CCAP corrective actions;
- Provide assistance to project and program owners in ensuring that corrective actions are properly addressed and closed;
- Establish a mechanism that ensures that corrective action closure documentation is captured;
- Establish and maintain evidence files for CCAP corrective actions; and
- Ensure that evidence files are properly maintained and catalogued.

I believe that we have a clear understanding of the causes behind the series of events experienced at RFETS. The CCAP addresses all of the major issues, however, it is a living document that will be updated as we complete assessments covering the effectiveness of our corrective actions. I look forward to continuing to work with you and your staff as we continue to take actions that will enhance the safety of site closure activities. I will share any revisions to the CCAP with your staff as they occur.

Sincerely,



Alan M. Parker  
President & CEO  
Kaiser-Hill Company, LLC

Attachment:  
As Stated

Original and 1 cc – Frazer R. Lockhart



## Comprehensive Corrective Action Plan Kaiser Hill LLC

### Expectations, Feedback, Issues Management

Corrective Action	RM	Date Due	Status
Establish Executive Safety Review Board (ESRB) to: Review facility and institutional trends to determine collective significance and programmatic implications. Review safety significant events and issues with programmatic implications to ensure: identification and proper reporting, sufficiently robust cause analysis, corrective actions are adequate and appropriately targeted to root causes, corrective actions are completed, and corrective actions achieve the desired results. Provide feedback and direction concerning the focus and conduct of assessments.	Parker	12/12/2003	Complete
CEO clarify expectations with VPs on: accountability and performance; importance for procedural compliance; the need for robust, self critical analyses; the need for ensuring that cause analysis teams are sufficiently staffed; and the need for effective corrective actions; value of -on-the-floor presence of all levels of management and safety professionals, and mentoring as an effective tool; need for open internal and external reporting; value and importance of both self & independent assessment	Parker	1/30/2004	Complete
Meet with all Site Safety Management Program (SMP) owners to reaffirm expectations and accountability for their role as SMP owners in assessing SMP health, communicating issues, and establishing SMP Assessment criteria.	Lyle	2/4/2004	Complete
Disseminate the facts and results of the B371 GB-8 fire (and other recent significant events) and discuss with all workers: managements expectations, including worker response to fires and use of extinguishers, notification and evacuation, and evacuation protocols; what went wrong and why; and what management is doing to ensure that the serious problems are corrected.	Projects	2/20/2004	Complete
CEO meet with job supervisors to verify that messages being sent to the workforce are being accurately received and to reaffirm his support and expectations.	Parker	4/15/2004	Started
Conduct quarterly All Hands Safety Meetings, CEO schedule early each quarter. SE&QP provides supporting information: Recent safety issues, Lessons Learned and Good Practices, Upcoming events and milestones, Solicit workforce feedback, Communicate outcome, reinforce expectations.	Parker/Lyle	4/20/2004	Not Started

## Comprehensive Corrective Action Plan Kaiser Hill LLC

### Expectations, Feedback, Issues Management

Corrective Action	RM	Date Due	Status
Enhance the Safety Analysis Center (SAC) process to: Improve identification of programmatic & collective significance of events, potential trends, and precursor conditions; establish an active interface with the ESRB and criteria for referring events and analyses to the ESRB; adopt ORPS Cause codes; establish and report on procedural compliance metrics; clarify process for dispositioning of DOE Facility Representative comments; collect and disseminate Independent and Self Assessment data to SMP owners; Provide input to communications on trends, emerging or cyclic issues for use in employee communication tools.	Williams	5/15/2004	Started

### Work Control

Corrective Action	RM	Date Due	Status
Conduct a work control workshop with a representative group of planners, supervisors and workers to provide inputs for needed changes to the IWCP and procedures programs.	Williams	3/12/2004	Complete
CEO direct Project Managers to develop documented process for enhanced utilization of technical resources to respond to and assist work crews in the field.	Williams	3/24/2004	Complete
As a compensatory measure while corrective actions are in progress, issue a Standing Order to initiate a senior level Project process for the review and release of work packages to ensure: the correct type of work package is being used, work package scope is appropriately defined and hazards identified, and the level of detail for controls and instructions is appropriate	Projects	3/31/2004	Complete
Complete a Site Integrated Safety Management System (ISMS) evaluation with emphasis on Work Control, by an independent team of outside experts. Review and develop a corrective action plan to address findings.	Ford	3/31/2004	Complete
Develop integrated walk down guidance for enhancing effectiveness of walk downs.	Williams	4/1/2004	Complete
CEO direct Project Managers to prioritize and allocate time for walk downs, ensure crew walk down and participation, and ensure turnover crew walk down	Parker	4/1/2004	Complete

## Comprehensive Corrective Action Plan Kaiser Hill LLC

### Work Control

Corrective Action	RM	Date Due	Status
Based upon results of RWP and IWCP reviews make necessary changes to the IWCP manual, procedure process, and radiological hazard analysis processes (ALARA and RWP) and develop an implementation plan	Sexton	4/30/2004	Started
With project support conduct a review of radiological work permit implementation to determine the quality and consistency of site RWPs and compliance with the site Radiological Control Manual and Integrated Work Control Manual.	Sexton	4/30/2004	Started
Evaluate Automated Hazards Analysis system used at other sites for developing JHAs and determine appropriateness for use at RFETS.	Williams	4/30/2004	Not Started
Provide guidance in IWCP for walk downs, developing scope, single revision process, clarify WP selection criteria, and use of mockups and develop real time feedback process.	Sexton	4/30/2004	Started
Develop examples of IWCP packages that demonstrate the enhanced work control process.	Williams	5/15/2004	Not Started
Based on the results of the RWP implementation review for quality and consistency, and input from the Radiological Safety Center of Excellence, revise site RWPs and/or procedural guidance as appropriate.	Sexton	5/15/2004	Not Started
Communicate changes to management, supervision, and workers; provide additional training as necessary to planners, RMs, Rad Ops Supervisors, and Rad Engineers.	Projects	5/30/2004	Not Started
Verify effectiveness of enhanced technical response resources to respond to and assist work crews in the field.	Lyle	6/15/2004	Not Started
Perform a documented review and, as necessary, revise active work packages, procedures, radiation work permits, (RWP), and/or ALARA reviews	Projects	6/15/2004	Not Started

## Comprehensive Corrective Action Plan Kaiser Hill LLC

### Conduct of Operations (COOP)

Corrective Action	RM	Date Due	Status
Review Standing Orders and revise, extend, supercede, delete, or incorporate as appropriate.	Lyle	12/26/2003	Complete
Provide clear guidance and expectations for conducting effective Pre-Evolution Briefings and conducting effective Plan of the Day meetings. - Revise the site Conduct of Operations Manual, MAN-066-COOP to enhance the Pre-Evolution Brief process to ensure that the work crew and supervisor fully understand the daily work scope, hazards, controls, and procedure compliance requirements, and are ready to go to work. Enhance the Plan of the Day (POD) process to require discussion of concurrent/sequential work activities that may interact, interfere or impact other activities at the POD	Williams	1/15/2004	Complete
Provide clear guidance and expectations for conducting effective Pre-Evolution Briefings and conducting effective Plan of the Day meetings. - Clearly communicate changes and appropriately train the workforce to effectively implement COOP changes.	Projects	2/2/2004	Complete
VPs clarify expectations with the workforce on importance of procedural compliance.	Projects	2/20/2004	Complete
Revise SMP Procedure (PRO-1331-SMP) to clarify responsibility of SMP Owners for evaluation of their program's health.	Lyle/Projects	4/30/2004	Started

### Cause Analysis

Corrective Action	RM	Date Due	Status
Senior managers discuss the initiating deficiencies, causes, and corrective actions of recent events, and expectations with the workforce	Projects	2/20/2004	Complete
Evaluate and revise the K-H PAAA reporting program to improve performance in meeting EH-6 guidance.	Sexton	4/15/2004	Started
Evaluate Site process for cause analysis and make changes as necessary to provide clear guidance and expectations for effectively performing cause analyses.	Sexton	4/30/2004	Started

## Comprehensive Corrective Action Plan Kaiser Hill LLC

### Assessment Programs

Corrective Action	RM	Date Due	Status
Develop a CY04 Integrated Assessment schedule that increases number and scope of assessments based on risk priorities to include the following: Independent Assessment - ISM/work control program/process implementation; implementation of training in the Projects; self assessment process effectiveness; and cause analysis and corrective action process including implementation. Self-Assessments - work control program execution, combustible control implementation, and COOP.	Ford	1/31/2004	Complete
Conduct an independent review of GB-8 fire, investigation, cause analysis, corrective actions.	Spears	2/6/2004	Complete
CH2M Hill establish nuclear safety corporate governance function which will perform evaluations of selected safety areas.	Christopher	2/26/2004	Complete
Perform self assessments in the following areas: work control program, combustible control program implementation, use of accountability boards, formality of operations in CCA offices, use of HIS 20 system, housekeeping in out of the way areas	Projects	3/31/2004	Started
Evaluate assessment programs at other sites for applicability for enhancing the RFETS program.	Ford	4/15/2004	Started
Evaluate site assessment program and change as necessary based on the review of other assessment programs.	Ford	4/30/2004	Started
Revise self-assessment procedures to include specific requirements for appropriate treatment of precursor conditions and ensure that assessment products (plans, reports and conclusions) are submitted to SAC.	Ford	4/30/2004	Started
Assess the effectiveness of the ESRB.	Parker	6/15/2004	Not Started
Perform independent assessment of work planning and execution changes.	Ford	8/30/2004	Not Started

## Comprehensive Corrective Action Plan Kaiser Hill LLC

### Emergency Response

Corrective Action	RM	Date Due	Status
Issue Standing Order (SO) on employee/worker fire response requirements.	Lyle	3/15/2004	Complete
Update PremAire training to include emergency response expectations and required actions.	Walgren	3/31/2004	Started
Evaluate and revise as necessary, Site and building emergency response procedures to make sure they adequately address: events and conditions likely to occur; CCA responsibilities; assumption of Shift Superintendent functions; facility reentry criteria and required actions; drills and exercise criteria, including required scenarios; and emergency ventilation operations	Gibbs	4/30/2004	Started
Incorporate SO requirements into the Fire Protection Program Manual (FPPM) as source document for employee/worker fire fighting criteria and revise other Site documents and training material to align with the FPPM.	Campbell	4/30/2004	Started
Communicate changes to managers, supervisors, and workers; and train fire watch standers and PremAire workers	Projects	4/30/2004	Started
Evaluate current method for updating Fire Pre-Plan and determine if alternate procedure would be more effective given the rapidly changing facility conditions. Implement alternate approaches, as applicable.	Snyder	4/30/2004	Started

### Safety Basis

Corrective Action	RM	Date Due	Status
Establish and implement a B371/374 DBIO with simplified controls.	Trice	9/25/2003	Complete
Perform a self-assessment of Surveillance Requirement documentation since DBIO implementation to ensure implementation has been maintained.	Projects	4/15/2004	Not Started
Assess DBIO (or currently active DSA) IVR evidence to assure compliance with the IVR process (559, 707, 776 only)	Geis	4/30/2004	Not Started

## Comprehensive Corrective Action Plan Kaiser Hill LLC

### Safety Basis

Corrective Action	RM	Date Due	Status
Review and revise the Site ISMS Manual as necessary to address changes made to Safety Management Program documents	Williams	5/30/2004	Not Started

### Training

Corrective Action	RM	Date Due	Status
Establish qualification process for personnel performing self-assessments and surveillances.	Ford	4/15/2004	Not Started
Evaluate training program processes and implementation for appropriate use of LOQI and promulgation of procedure changes. Establish corrective actions to address deficiencies identified.	Lyle	4/30/2004	Not Started
Train and qualify self-assessment personnel to assessment program requirements.	Projects	5/15/2004	Not Started
Establish training requirements for personnel performing cause analysis and collective significance	Sexton	5/15/2004	Not Started
Conduct training involving senior, experienced job supervisors sharing lessons on work force management techniques and proper response to worker concerns.	Williams/Projects	5/15/2004	Not Started
Revise the requirements for conducting drills to evaluate the effectiveness of employee response to fires.	Projects	5/15/2004	Started
Train cause analysts, SMP owners, and Project SMP representatives on cause analysis requirements.	Projects	6/15/2004	Not Started