



The Deputy Secretary of Energy
Washington, DC 20585

October 19, 1999

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DNF SAFETY BOARD

The Honorable John T. Conway
Chairman
Defense Nuclear Facilities Safety Board
625 Indiana Avenue, N.W.
Suite 700
Washington, DC 20004-2901

Dear Mr. Chairman:

John
This is in response to your August 26, 1999, letter, which requested a report concerning the adequacy of implementation of DOE Order 425.1A, "Startup and Restart of Nuclear Facilities."

I agree with your assessment that the Department has a technically sound and flexible approach for confirmation of readiness that is set forth in DOE Order 425.1A and associated standards. A vigorous readiness review program also is implicit in the Secretary's commitment to a Department-wide Integrated Safety Management System (ISMS).

Additionally, the Department's readiness review process requires that the Office of Independent Oversight (EH-2) assess Lead Program Secretarial Officer (LPSO), Operations Office, and contractor procedures and provide periodic reports on their effectiveness. I believe that the Department's startup and restart requirements and standards, coupled with the principles of ISMS; self-assessments required by DOE Policy 450.5; and independent oversight provide the necessary infrastructure for effective readiness reviews.

To ensure that this infrastructure is in place and working, I have asked the Office of Defense Programs (DP) to lead a multiple organization Headquarters line management team to review readiness process implementation. The Office of Environment, Safety and Health (EH) will participate as a member of the Headquarters team. This team has established a two-step process to fully review and respond to your issues. For the first step, I have sent the enclosed detailed information request to the LPSOs and Operations Offices requesting specific implementation information, procedures, and evidence of implementation for the previous 12 months. This information is to be provided to the Headquarters team by November 3, 1999. The second step is a review of these submittals by the Headquarters team. The Headquarters team is expected to interact with the LPSOs and the Operations Offices for clarification of data received and to obtain consistent and thorough information in order to fully respond to your request for a

report on this matter. In order to allow adequate time for the Headquarters team to review, evaluate, and integrate the information from Step One, and develop the comprehensive report, I request an additional 60 days to provide the report you requested and to recommend any needed actions based on their evaluation.

In addition, the training course for Operational Readiness Review (ORR) teams continues to be offered in support of line management. We are scheduled to conduct the course this fall to support an impending startup at Lawrence Livermore National Laboratory. As stated above, the confirmation of readiness is a key element to our ISMS efforts. The first principle remains: line management is responsible. The startup/restart process continues to be a valuable tool to assure that our work is accomplished safely. We will make the needed improvement and corrective actions to ensure that this program continues to be increasingly more effective in drawing us to the goal of conducting work safely.

Sincerely,

A handwritten signature in black ink, appearing to read 'TJ', with a large, stylized flourish extending from the bottom right.

T. J. Glauthier

SEPARATION


PAGE



The Deputy Secretary of Energy
Washington, DC 20585

October 19, 1999

MEMORANDUM FOR DISTRIBUTION:

FROM:  T. J. GLAUTHIER
SUBJECT: Readiness Review Program

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Attached is a letter from the Defense Nuclear Facilities Safety Board (Board) that draws my attention to several issues with the current practices in the performance of Operational Readiness Reviews (ORRs), Readiness Assessments (RAs), and other local procedures used to review readiness (Attachment A). The Department's readiness review process is established by DOE Order 425.1 A, "Startup and Restart of Nuclear Facilities," and associated standards.

In order to address this Board issue, the following two steps will be conducted.

Step 1 - You should review the Board letter and your implementation of the readiness review process elements, including those procedures used by your contractors for confirming readiness for startup/restart of nuclear operations. In those cases where authority for the conduct of readiness reviews has been delegated, the delegating office should participate in the review directed by this letter. The readiness review process elements should be consistently implemented within the Lead Program Secretarial Office (LPSO), operations office, area office, site office, and contractor procedures. LPSOs should support the field offices in conducting this review and in making any required improvements. A guidance document is attached for your use in performing this review (Attachment B). Any deficiencies noted in your review should be the subject of a corrective action plan. Report the results of this review, including corrective action plans, to the appropriate LPSO and DP-45 (attention Jeff Roberson) by November 3, 1999.

In addition to the report of the results of the review of implementation, each field office manager is requested to include with the report a copy of all startup notification reports, including DOE approval actions, which have been received within the past 12 months. Please provide these by November 3, 1999, as well.

Step 2 - Due to their expertise in this particular area, I have asked the Office of Defense Programs (DP) to lead a multiple office Headquarters team to review,

integrate, and rollup the data provided from Step 1 into a comprehensive and responsive report for my review. The Office of Environment, Safety and Health (EH) will participate as a member of this team along with the other LPSOs. The report will then be forwarded to the Board. The Headquarters team may need to contact some of you during this phase for clarification or for more details to help the Headquarters team to provide a consistent and thorough response.

If you have any questions on this matter, contact Jeff Roberson (DP-45) at 301-903-8026.

Attachments

John T. Conway, Chairman
A.J. Eggenberger, Vice Chairman
Joseph J. DiMunno
Herbert John Cecil Kouts
John E. Mansfield

DEFENSE NUCLEAR FACILITIES SAFETY BOARD

625 Indiana Avenue, NW, Suite 700, Washington, D.C. 20004-2901
(202) 694-7000



1999-012919 Aug 26 p 2:50

August 26, 1999

The Honorable T. J. Glauthier
Deputy Secretary of Energy
1000 Independence Avenue, SW
Washington, DC 20585-1000

Dear Mr. Glauthier:

The Defense Nuclear Facilities Safety Board (Board) has been following closely the readiness review process at defense nuclear facilities. In numerous cases across the complex, such as the Hanford Site, the Y-12 Plant, and the Savannah River Site, the Board has identified issues with the readiness review process. These issues are demonstrated by a failure to conduct independent reviews; facilities and activities repeatedly declaring readiness to start reviews prematurely; and line managers (contractor and Department of Energy [DOE]) using readiness reviews to assist in attaining readiness, rather than as an independent confirmation of readiness. In addition, it appears that DOE operations offices and their contractors sometimes take extraordinary steps to avoid performing Operational Readiness Reviews and Readiness Assessments because of what is often regarded as an administrative burden. This is a matter that needs to be addressed throughout the complex, with the objective of reinvigorating the readiness review program.

The Board believes that the parent DOE Order 425.1A, *Startup and Restart of Nuclear Facilities*, and its associated standard describe a technically sound and flexible approach for contractor and DOE readiness reviews that is consistent with the principles of Integrated Safety Management. This flexible approach is easily scoped and tailored to the hazards of the work to be done. However, there appear to be significant issues with the execution of these requirements at the levels of the operations office and subordinate unit.

The Board recently highlighted for the Assistant Secretary for Defense Programs several areas in which the readiness review process used by DOE's Albuquerque Operations Office (DOE-AL) at the Pantex Plant was inconsistent with DOE Order 425.1A. DOE-AL responded expeditiously and constructively to the Board's observations. The Board believes a similar, but broader, effort should be made to ensure that all operations offices make the required improvements.


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Therefore, pursuant to 42 U.S.C. § 2286b(d), the Board requests a report from DOE within 60 days of receipt of this letter, addressing the following issues:

- An evaluation of the state of implementation of DOE Order 425.1A, *Startup and Restart of Nuclear Facilities*, on the part of contractors at defense nuclear facilities and their associated DOE field offices (i.e., operations, area, and site offices).
- A corrective action plan, including schedules, for addressing any deficiencies identified in the above analyses.

If you have any questions on this matter, please do not hesitate to contact me.

Sincerely,



John T. Conway
Chairman

c: Mr. Mark B. Whitaker, Jr.

DOE O 425.1A IMPLEMENTATION REVIEW GUIDANCE

ORR.1 DOE Order 425.1A, or predecessor orders 5480.31 or 425.1 are included in appropriate contracts. Operations Office; Area Office, Local Office and contractor procedures implementing the requirements of DOE Order 425.1A appropriately carry forward the key provisions of the governing directive. The procedures are executed in a manner that assures the requirements and the intent of DOE O 425.1A are met.

Criteria

DOE Order 425.1A, or predecessor orders 5480.31 or 425.1, are included in the contract between DOE and the M&O/M&I Contractor. The orders are also included in flowdown contracts with major subcontractors. (DOE O 425.1A CRD; DEAR)

Startup Notification reports are used to communicate intentions for the startup/restart review process. These reports identify all upcoming startup and/or restarts and the proposed readiness review process. These reports are used as a formal process to gain the agreement and approval of the appropriate readiness review process by the operating contractor, the appropriate line manager, and the startup authority. (DOE O 425.1A, para 4.b.(1), and para 4.c.(1))

Contractor and DOE implementing procedures contain the necessary provisions for independence of those personal involved in the readiness review process. Specifically, a senior member (team leader, or senior advisor) shall not be from the line organization responsible for the operation of the facility without specific approval of the Startup Authority for all ORRs. Team members are not assigned to review material for which they are responsible. (DOE O 425.1A, para 4.b.(4)(b))

Contractor and DOE implementing procedures require the development of plans-of-action for ORRs and RAs. The plans-of-action specify prerequisites for the start of the review that are tied to the individual Core Requirements. Plans-of-action are prepared by line management and approved by the startup authority. Plans-of-action are provided to EH-2 for review and comment. (DOE O 425.1A, para 4.b.(3))

Readiness reviews are commenced only after readiness has been achieved. ORRs and RAs are not started prior to the completion of the specified prerequisites. (DOE O 425.1A para 1)

Approach

Record Review: Review appropriate contracts to verify that DOE O 425.1A or predecessor orders are included. Review Operations Office, Area Office, Local (Site) Office, and contractor (including major sub-contractor if appropriate) procedures to ensure that DOE O 425.1A (5480.31) requirements are accurately reflected in these documents. Review recent (past two years) startup notification reports (SNR) to verify that all upcoming startups/restarts have been identified in a timely manner and that the appropriate readiness review process has been identified and agreed to by all specified parties up to and including the startup authority. Review recent (within past two years) plans-of-action (POA) for both contractor and DOE ORRs and RAs and verify that the scope was properly defined, appropriate prerequisites specified, appropriate team leaders proposed, requirement for EH-2 review met, and approval by the appropriate restart authority specified. Review the reports of recently completed DOE and Contractor ORRs and RAs to determine if the requirements of the Order and the specifics of the POA were effectively met. Evaluate the level and complexity of the findings in the reviews to determine whether readiness had been achieved prior to commencement of the ORR/RA. Review DOE (from PSO to the lowest level restart authority) and contractor documentation to ensure that the levels of approval specified in implementing documentation is in compliance with the requirements of the DOE 425.1A (5480.31) including formal delegation to a lower level.

Interviews: Interview contractor and DOE line managers to assess their understanding of the key provisions of the DOE O 425.1A and the local implementing procedures, particularly regarding the requirements for preparation of various documents including SNR and POAs, criteria for various levels of readiness reviews, need for achieving readiness prior to conducting the review, and review team

independence requirements. Also, evaluate the compliance of the individual line managers with the requirements of DOE O 425.1A. Interview DOE and contractor (including major sub-contractors if appropriate) subject matter experts responsible for implementation of DOE O 425.1A to determine the status of meeting the specific criteria. Interview team leaders of current and past DOE and Contractor Readiness Reviews to determine their knowledge of the requirements of DOE O 425.1A and the local implementing directives as well as how effectively those requirements were met incident to the reviews they led.

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