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## DEFENSE NUCLEAR FACILITIES SAFETY BOARD

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95-0003826



July 24, 1995

The Honorable Charles B. Curtis  
Under Secretary of Energy  
Washington, D.C. 20585

Dear Under Secretary Curtis:

The Defense Nuclear Facilities Safety Board (Board) continues to review the Department of Energy's (DOE) progress in fulfilling its commitments under the Implementation Plan for Board Recommendation 91-6. While DOE has made some progress in addressing the concerns identified by the Board in Recommendation 91-6, many Implementation Plan commitments in radiological protection continue to be unnecessarily delayed and need attention. Three examples may help to elaborate this point.

First, elements in Recommendation 91-6 recommended that the Department evaluate the adequacy of its infrastructure and resources dedicated to radiation protection at Defense Nuclear Facilities. DOE began implementing this recommendation in 1993 by forming an evaluation team led by Dr. John Poston. The team's report, to have been provided by March 1994, was submitted to the Secretary 10 months late, in January 1995. An EH action plan was prepared in June 1995, resulting in over a year slippage in the schedule. Now it appears that the plan includes another review and possible changes and further schedule slippage after the recommendations of the Strategic Alignment Initiative (SAI) team are available.

Second, periodic reports, such as the Annual Report on the implementation of radiological controls and the First Quarter 1995 Quarterly Status Report, have been slow to be completed. For example, the 1994 Annual Report is not expected to be issued until August 1995, and the Quarterly Status Report for the period ending March 30, 1995, was not submitted until July 12, 1995.

Third, most tasks associated with the implementation of knowledge, skills, abilities, training and qualification for key radiation protection positions have been delayed and are approximately one year behind schedule.

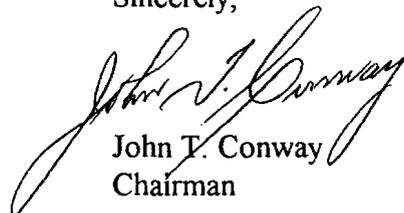
These delays and others are traceable to DOE's failure to establish responsible ownership of Implementation Plan commitments. In particular, the roles, responsibilities and interactions of responsible individuals have not been sufficiently defined and accepted to ensure that Recommendation 91-6 is successfully implemented and that commitments are met. Our assessment of DOE's performance to date and discussions with DOE staff suggest that

sufficient urgency to completing commitments under the Implementation Plan does not exist. Therefore, pursuant to 42 U.S.C. Section 2286b(d), the Board requests that DOE provide a report at your earliest convenience which will:

1. Establish revised due dates for all missed commitments and milestones.
2. Identify the problems that caused the delays.
3. Describe the corrective actions that will be taken to ensure that all commitments under the Implementation Plan for Recommendation 91-6 will be timely and fully implemented.
4. Identify the single DOE official who has overall authority and responsibility for the implementation of Recommendation 91-6 and DOE's implementation plan commitment and who will ensure the quality of work products. Previous DOE assignments of shared responsibility, led by EH, have not worked, since EH cannot direct implementation action by DOE line organizations in DP and EM.

Please let me know if you require additional information.

Sincerely,



John T. Conway  
Chairman

cc: The Honorable Archer L. Durham  
The Honorable Thomas P. Grumbly  
The Honorable Tara O'Toole  
The Honorable Victor H. Reis  
Mr. Donald W. Pearman  
Mr. Mark Whitaker