

Department of Energy

Washington, DC 20585

DEC 28 2007

The Honorable A. J. Eggenberger Chairman Defense Nuclear Facilities Safety Board 625 Indiana Avenue, NW Suite 700 Washington, DC 20004-2901

Dear Mr. Chairman:

This letter is to report on the implementation of the Department of Energy (DOE) Operating Experience Program (OEP) in the Office of Environmental Management (EM) as specified in Commitment 19.2 of the Department of Energy's (DOE) Implementation Plan, Revision 2, October 2006, for Recommendation 2004-1, Oversight of Complex, High-Hazard Nuclear Operations.

EM has focused on several areas in our implementation of the Integrated Safety Management (ISM) Core Function "Feedback and Improvement" as we continue to implement the DOE OEP outlined in DOE Order 210.2, *DOE Corporate Operating Experience Program.* A status of the EM OEP implementation activities is enclosed for your information.

While we have made good progress in our lessons learned process in general, the specific implementation of DOE Corporate OEP is just now maturing enough at our sites for us to initiate a systematic line oversight approach to evaluate site implementation. A review of the status of implementation shows that while some sites report they implemented the program, others are making progress in the development of more formal processes to fully implement the Order.

Our plan for providing line oversight of the implementation of DOE Order 2 10.2 in FY-2008 is as follows:

- 1. Develop a Criteria, Review, and Approach Document (CRAD) to help ensure effective, consistent assessment of the implementation of the OEP.
- 2. Direct EM Field Offices to perform self-assessments of their site-wide OEP, as well as assessments of their contractors OEP using the developed CRAD. These assessments may be separate or part of another larger scope assessment such as an ISM System effectiveness review or verification. As an example, EM assessed the OEP implementation at the Richland Field Office by participating in the recent Phase II verification of the Washington Closure Hanford contractor ISM System.



3. EM will conduct OEP line oversight assessments for at least two sites, and will review the Field's self-assessment results at other EM sites in order to comprehensively evaluate EM complex-wide implementation posture.

We will provide an annual report summarizing the results of this comprehensive OEP line oversight to your staff prior to October 31, 2008.

If you have any further questions, please call me at (202) 586-0738, or Mr. Dae Y. Chung, Deputy Assistant Secretary for Safety Management and Operations, at (202) 586-5151.

Sincerely,

James M. Owendoff Chief Operations Officer for

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Environmental Management

Enclosure

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