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# DEFENSE NUCLEAR FACILITIES SAFETY BOARD

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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.

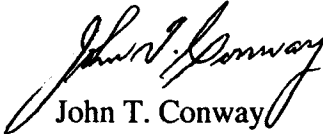
The Board recently highlighted for the Assistant Secretary for Defense Programs several areas in which the readiness review process used by DOE's Albuquerque Operations Office (DOE-AL) at the Pantex Plant was inconsistent with DOE Order 425.1A. DOE-AL responded expeditiously and constructively to the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

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.