

has now placed on its PAAA program. Further, these changes place your organization in a position to utilize the PAAA program effectively as a valuable tool to improve nuclear safety performance.

2. BN's screening and reporting of potential PAAA noncompliances, as demonstrated through the use of form BN 1415, *Price-Anderson Amendments Act (PAAA) Screening*, is fully consistent with DOE expectations and guidance if implemented consistently.
3. Evidence was provided that BN identifies and tracks potential noncompliances below Noncompliance Tracking System (NTS) reporting thresholds. This improvement in the BN PAAA program should enhance BN's ability to identify potential programmatic or repetitive noncompliances.
4. BN has modified the processes it uses to screen, identify, and report potential noncompliances, allowing for a more efficient and timely processing of nuclear safety issues.
5. BN has implemented a corrective action tracking system known as caWeb. This system serves as the primary means by which potential nuclear safety noncompliances are screened, identified, reported and associated corrective actions are tracked. CaWeb draws from a number of source documents, to include those generated external to the BN organization.
6. Formal documentation to support the BN PAAA program has been developed and integrated into other BN organizational activities such as work planning, self-assessment, and issue reporting.
7. PAAA training has been provided for BN general employees and all levels of management, including senior management. The training appears to be comprehensive and tailored appropriately to the personnel being trained.

While OE recognizes the significant strides BN has made in the recent past to improve its PAAA program, OE noted several opportunities for improvements in the BN PAAA process to include the following:

1. Procedural documentation of the BN PAAA program could be enhanced through the development of formal procedures related to screening and reporting of potential noncompliances, tracking and trending of nonreportable nuclear safety issues, and identifying programmatic and repetitive noncompliances.
2. Currently BN internally tracks 53 nonreportable PAAA noncompliances. However, trending of these noncompliances is accomplished in an informal manner. It was stated during the OE visit that this informal practice is effective because there are a relatively small number of noncompliances

currently being tracked. However, as BN's performance assessment program becomes more effective, many more issues will be identified for internal tracking. Failure to formalize the trending of these internally tracked noncompliance issues may impede BN's ability to identify repetitive or programmatic noncompliances.

3. In reviewing documentation associated with the BN corrective action management process, OE noted that there was no discussion on the conduct of "extent of condition" reviews to aid in the identification of cross site nuclear safety issues associated with a particular adverse condition. Extent of condition reviews are viewed by OE as an important tool in preventing recurrence of nuclear safety related events. Because Bechtel has a number of organizations involved in DOE activities, Bechtel should consider formally instituting the practice of determining extent of condition related to noncompliance issues and sharing lessons learned across all Bechtel DOE activities.
4. Discussions with BN personnel revealed that the BN management assessment process is a work in progress and has yet to reach a full state of maturity. The BN management assessment program would benefit from a mentoring program such as that used at the Savannah River Site to enhance the quality of its assessments.
5. Training requirements for BN personnel conducting critiques and management assessments are extremely weak. Training requirements for BN personnel conducting these activities should be enhanced and formally documented in procedures.

In summary, OE has concluded that significant improvements have occurred in the BN PAAA program since our November 2002, program review. OE is pleased with the aggressive actions BN has taken to correct its longstanding PAAA program deficiencies. Nonetheless, opportunities for further improvement are present and we encourage BN to pursue them.

No reply to this correspondence is required. OE in conjunction with NNSA/NSO will continue to monitor your performance and appreciates your continuing cooperation with our efforts to improve nuclear safety in the DOE complex. If you have any questions, please contact me at (301) 903-0100 or have your staff contact Richard Day, at (301) 903-8371.

Sincerely,



for Stephen M. Sohinki

Director

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