



The Deputy Secretary of Energy
Washington, DC 20585

October 19, 1999

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).

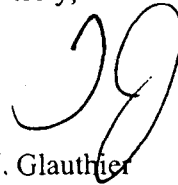
Additionally, the Department's readiness review process requires that the Office of Independent Oversight (EH-2) assess Lead Program Secretarial Officer (LPSO), Operations Office, and contractor procedures and provide periodic reports on their effectiveness. I believe that the Department's startup and 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 be 'TJ' with a large flourish underneath.

T. J. Glauthier