



The Secretary of Energy

Washington, DC 20585

October 29, 1999

The Honorable John T. Conway
Chairman, Defense Nuclear Facilities Safety Board
625 Indiana Avenue, N.W. Suite 700
Washington, D.C. 20004-2901

Dear Mr. Chairman:

Your July 8, 1999, letter to me regarding the results of recent reviews of chemical hazards assessments at the Y-12 Plant in Oak Ridge, Tennessee, stated that the Defense Nuclear Facilities Safety Board (Board) was interested in hearing what corrective actions may be taken to address the major issues identified in your letter. The issues related to contractor tardiness in implementing effective Emergency Management and Chemical Safety Programs, Department of Energy management's failure to take aggressive action to ensure effective programs are implemented, and that open occurrence reports and unresolved safety questions receive management attention through resolution.

Enclosure 1 outlines the Department's current and pending actions to these issues. Enclosure 2 addresses the need for more clearly defined standards, expectations, and criteria. These actions confirm our commitment to ensure that our contractors are timely in responding to Departmental directives. We welcome a Board staff review at the end of the first quarter of calendar year 2000 to evaluate our progress in implementing corrective actions to improve the Chemical Safety and Emergency Management Programs at the Y-12 Plant. Mr. A. Lee Watkins, Assistant Manager for Defense Programs, Oak Ridge Operations Office, is the responsible manager for executing the Y-12 Emergency Management Action Plan. Mr. Watkins can be reached at (423) 576-0752. Mr. Robert Poe, Assistant Manager for Environment, Safety and Quality, Oak Ridge Operations Office, is the responsible manager for the Chemical Safety Program for the Oak Ridge Reservation, and can be reached at (423) 576-0891.

We appreciate the advice and support provided by the Board and its staff during the chemical hazards assessments at the Y-12 Plant and welcome subsequent follow-up discussions relative to the execution of our corrective actions.

Yours sincerely,

A handwritten signature in cursive script that reads "Bill Richardson".

Bill Richardson

Enclosures



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CURRENT AND PENDING ACTIONS

- On August 11, 1999, the Deputy Manager, Oak Ridge Operations Office, briefed the Board regarding Oak Ridge Operations Office senior management's proposed actions to establish an aggressive plan to implement Emergency Management Program corrective actions in response to the Board's July 8, 1999, letter.
- The Manager, Oak Ridge Operations Office, appointed an Emergency Management Working Group to advise senior management and support the Oak Ridge Operations Office Emergency Management Program Office in developing an effective and efficient Emergency Management Program for the Oak Ridge Reservation. This Emergency Management Working Group, with representatives from the Emergency Management Program Office and each Oak Ridge Reservation line organization, developed an Emergency Management Action Plan identifying actions to correct deficiencies noted in recent assessments of the Emergency Management Program by the Board staff, Department of Energy Headquarters and local organizations.
- The Department of Energy Oak Ridge Operations Office Y-12 line manager transmitted the Emergency Management Action Plan to Lockheed Martin Energy Systems, Inc., the Management and Operating contractor for Y-12, directing the implementation of the corrective actions in the plan applicable to Lockheed Martin Energy Systems, Inc., in accordance with the defined schedule. A monthly update of the contractor's actions to meet the commitments will begin this month.
- The Emergency Management Working Group participated in a video conference with the Board staff on September 13, 1999, to review the Emergency Management Action Plan. We will continue to communicate with your staff regarding implementation of the plan.
- An updated Oak Ridge Operations Office Chemical Safety Action Plan is under review and expected to be issued by October 15, 1999.
- The Oak Ridge Operations Office Assistant Manager for Defense Programs initiated detailed monthly reviews and briefings on open occurrence reports to increase the emphasis on more timely resolution by the contractor.

- The Department of Energy Headquarters Office of Emergency Response will conduct an onsite review of Y-12's corrective actions for issues identified by the DOE Headquarters Office of Oversight's Integrated Safety Management Evaluations, dated December 1998. A copy of the onsite review report will be provided to the Board staff upon completion. The review will verify the adequacy of the corrective actions implemented in response to the following Office of Independent Oversight issues:
 - Lockheed Martin Energy Systems, Inc., has not implemented requirements of the Department of Energy Emergency Management Order or Oak Ridge Reservation Emergency Plan.
 - Lessons Learned Program is not effectively capturing lessons learned from all sources, transmitting them down to working level.
 - Y-12 Plant does not have effective systems for managing and analyzing backlog of corrective actions and findings.
 - Y-12 Plant does not have comprehensive approach for retaining critical skills necessary to manage and operate the Y-12 Plant.

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ISSUE	ACTION	COMPLETION DATE	ACCOUNTABILITY
1.0 Hazard Assessments/EALs Incomplete resulting in inadequate analysis of potential accidents and their consequences	1.1 Examine existing schedules for HA/HS/EALs	Completed 8/6/99	Line Assistant Managers
	1.2 Examine Assessment Methodology	Completed	Working Group
	1.3 Resolve differences in initiating event scenarios	Completed 8/31/99	Working Group
	1.4 Completion of HAs/EALs by contractors	Y-12 12/31/99 primary, 6/30/00 for all X-10 10/1/99 ETTP 12/31/99	Line Assistant Managers
	1.5 Identify actions necessary to update the existing ORR EPZ (if needed)	1/31/00	EMPO/AMESQ
	1.6 Monitor progress against schedule and line Assistant Managers brief Manager monthly	Ongoing	Line Assistant Managers
	1.7 Develop ORO review and approval methodology for Hazard Assessments/EALs	Completed 8/20/99	Working Group
	1.8 Perform ORO reviews of HAs/EALs	Ongoing – final completion 3/31/00	Line Assistant Managers

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ISSUE	ACTION	COMPLETION DATE	ACCOUNTABILITY
2.0 An effective Emergency Management program has not been implemented at ORO. The ORR Emergency Plan is Incomplete. A transition plan identified in Hall policy guidance of 5/12/99 is not implemented.	2.1 Review policy strategy for Emergency Management program transition plan and brief Senior Management on current status of transition.	Completed 8/10/99	Working Group
	2.2 Determine need to modify 5/12/99 policy letter based upon discussion with Senior management concerning reservation concept versus site responsibility. (Command and Control structure and ERAP)	Completed 8/10/99	Working Group
2.0 An effective Emergency Management program has not been implemented at ORO. The ORR Emergency Plan is Incomplete. A transition plan identified in Hall policy guidance of 5/12/99 is not implemented. (Continued)	2.3 Define Emergency Management Plan standards and requirements for the Oak Ridge Reservation (ORR)	Completed 9/3/99	Working Group
	2.4 Contractor submittal of site specific annex for the ORR Emergency Plan	10/1/99	Line Assistant Managers
	2.5 Update and re-issue Emergency Plan for ORR with annexes for each site	11/30/99	EMPO/AMESQ

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ISSUE	ACTION	COMPLETION DATE	ACCOUNTABILITY
	2.6 Implement ORR Emergency Plan	12/31/99	EMPO/AMESQ
3.0 Procedures not issued to implement emergency plan	3.1 Define EIPs for each site and ORO	Completed 9/1/99	Working Group
	3.2 Develop EIPs for each site and ORO	Y-12 12/31/99 X-10 10/29/99 ETTP 12/17/99 ORO 11/30/99	Line Assistant Managers EMPO/AMESQ
	3.3 Implement EIPs for each site and ORO	Y-12 3/31/00 X-10 12/31/99 ETTP 12/31/99 ORO 12/31/99	Line Assistant Managers EMPO/AMESQ
	3.4 Develop and Issue remaining Command Media	3/31/00	Line Assistant Managers EMPO/AMESQ
4.0 Compliance with DOE Order 151.1 by required date – 9/30/99 – will not occur.	4.1 Determine compliance status for contractors and ORO	Completed 8/6/99	Line Assistant Managers
	4.2 Identify specific areas of non-compliance with requirements and develop a Request for Approval/Compliance Schedule Agreement, Justification for Continued Operations, or equivalent.	Completed 8/31/99	Line Assistant Managers
4.0 Compliance with DOE Order 151.1 by required date – 9/30/99 – will not occur. (Continued)	4.3 ORO Manager submit request for approval of the RFA, JCO or equivalent to the Lead PSO with copies to Defense Programs and Environmental Mgmt.	9/30/99	Working Group

ORO Emergency Management – Action Plan – Revision 0

ISSUE	ACTION	COMPLETION DATE	ACCOUNTABILITY
	4.4 Monitor implementation of corrective actions and verify compliance in accordance with defined schedules.	Y-12 3/31/00 X-10 1/31/00 ETTP 1/31/00	Line Assistant Managers
	4.5 Review contracts for compliance with order for Event, M&O, M&I, etc.	Completed 8/31/99	EMPO/AMESQ
	4.6 Submit changes (if any) for inclusion into contracts	Upon identification of need	EMPO/AMESQ
ISSUE	ACTION	COMPLETION DATE	ACCOUNTABILITY
5.0 Command and Control poorly defined and not well understood	5.1 Line organizations will perform review of contractor command and control functions to include: staffing, line representation, roles and responsibilities and training and qualification of ERO cadre.	Completed 8/31/99	Line Assistant Managers
	5.2 Define contractor and ORO ERO staffing and organization for EOC/TSC/IC	Y-12 9/3/99 Completed X-10 9/3/99 Completed ETTP 9/3/99 Completed ORO 9/3/99 Completed	Line Assistant Managers EMPO/AMESQ
	5.3 Implement staffing structure	Y-12 10/1/99 X-10 10/1/99 ETTP 10/1/99 ORO 10/1/99	Line Assistant Managers EMPO/AMESQ

ORO Emergency Management – Action Plan – Revision 0

ISSUE	ACTION	COMPLETION DATE	ACCOUNTABILITY
5.0 Command and Control poorly defined and not well understood (Continued)	5.4 Develop and formalize implementation plan for ORO ERO Command and Control structure.	Completed 8/27/99	EMPO/AMESQ
	5.5 Identify ORO ERO position requirements for performing duty roster concept of operations: rotational teams, consistent staffing of EOC/TSC, etc	Completed 9/1/99	EMPO/AMESQ
	5.6 Implement Duty Roster Concept	Completed 10/1/99	EMPO/AMESQ
6.0 Inadequate training/qualifications for contractor emergency response organization (ERO)	6.1 Assess contractor plan/process for evaluating qualification of existing ERO cadre, identify interim training needs, and implementing upgraded training and qualification of ERO cadre.	Completed 8/31/99	Line Assistant Managers
	6.2 Provide Training and qualifications for all ERO personnel	Y-12 10/29/99 interim, 1/31/00 final X-10 12/17/99 final ETTP 9/30/99 interim, 12/31/99 final	Line Assistant Managers
	6.3 Conduct assessment of ERO Cadre training and qualifications. Document results and corrective actions in the 1999 ERAP.	Completed 9/15/99	Line Assistant Managers
7.0 Inadequate training/qualifications for Federal emergency response organization (ERO)	7.1 Conduct assessment of Federal ERO Cadre training and qualifications	Completed 8/9/99	Training & Development Group

ORO Emergency Management – Action Plan – Revision 0

	7.2 Provide recommendations for improvements in formal qualification training and qualification program for Federal ERO cadre, including the need for interim training and qualification of current cadre	Completed 8/31/99	Training & Development Group EMPO/AMESQ
ISSUE	ACTION	COMPLETION DATE	ACCOUNTABILITY
7.0 Inadequate training/qualifications for Federal emergency response organization (ERO) (Continued)	7.3 Develop formal ERO training and qualification plan for Federal cadre.	9/30/99	Training & Development Group EMPO/AMESQ
	7.4 Complete interim learning activities for all ERO personnel	9/30/99	Training & Development Group EMPO/AMESQ
	7.5 Complete and document formal training for all ERO personnel	12/31/99	Training & Development Group EMPO/AMESQ
	7.6 Perform assessment	9/30/99 interim, 1/31/00 final	Training & Development Group EMPO/AMESQ
8.0 Contractor and ORO self assessment of Emergency Management Program less than adequate	8.1 Assess contractor plan/process for conducting self assessments of Emergency Management Program	Completed 8/31/99	Line Assistant Managers
	8.2 Contractors implement self assessment process to formally disposition performance issues	Y-12 12/31/99 X-10 12/31/99 ETTP 12/31/99	Line Assistant Managers
	8.3 Develop ORO self assessment process for the Emergency Management Program for the reservation	10/29/99	EMPO/AMESQ Line Assistant Managers

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9.0 Drills and Exercises are less than adequate to maintain proficiency of ERO cadre	9.1 Define, formalize and implement Drill and Exercise Program	Y-12 12/31/99 X-10 12/31/99 ETTP 12/31/99	Line Assistant Managers
	9.2 Develop annual drills and exercise schedule and send to EMPO	10/29/99	Line Assistant Managers
	9.3 Issue annual drills and exercise schedule	11/29/99	EMPO/AMESQ
	9.4 Assess the effectiveness of drills and exercises in ensuring the competency and proficiency of ERO personnel. Document results and corrective actions in the 1999 ERAP.	Completed 9/15/99	Line Assistant Managers EMPO/AMESQ
ISSUE	ACTION	COMPLETION DATE	ACCOUNTABILITY
10.0 Consequence Assessment Methodology differences among sites.	10.1 Review models to determine consistency	Completed 7/31/99	Working Group
	10.2 Evaluate feasibility of utilizing one model for all sites. Develop recommendations to Senior Managers	Completed 8/31/99	Working Group
ISSUE	ACTION	COMPLETION DATE	ACCOUNTABILITY
11.0 Identification of resources needed to implement and maintain the Emergency Management Program	11.1 Define resource needs	10/1/99	Line Assistant Managers EMPO/AMESQ

ORO Emergency Management – Action Plan – Revision 0

<p>12.0 Interfaces and coordination with external organizations and stakeholders are not consistently effective in ensuring a fully integrated response to an emergency in such areas as notification, support services, field monitoring, protective action and public notification.</p>	<p>12.1 Assess the effectiveness of interfaces and coordination with external organizations and stakeholders in ensuring a fully integrated response for notification, support services, protective actions, and public information during an emergency. Document results and corrective actions in the 1999 ERAP.</p>	<p>Completed 9/15/99</p>	<p>Line Assistant Managers EMPO/AMESQ</p>
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