National Nuclear Security Administration

Department of Energy
National Nuclear Security Administration
Washington, DC 20585

August 1, 2005

The Honorable A. J. Eggenberger
Chairman
Defense Nuclear Facilities Safety Board
625 Indiana Avenue, N.W., Suite 700
Washington, D.C. 20004-2901

Dear Mr. Chairman:

Commitment 4.6.2 of the Department's implementation plan for Recommendation 2002-3 calls for implementation reviews of existing Specific Administrative Controls (SACs) and a report to the Defense Nuclear Facilities Safety Board (DNFSB) by June 30, 2005. The enclosed National Nuclear Security Administration (NNSA) correspondence of November 25, 2003, describes how these reviews were conducted and documented.

As described in the Department's 2002-3 implementation plan, NNSA sites integrated these SAC reviews with the normal reviews of safety basis implementation and operational oversight. NNSA sites reviewed all currently approved and implemented 10 CFR 830 Documented Safety Analyses (DSAs) except as noted below for Sandia National Laboratories and the Y-12 National Security Complex. A single data sheet for each SAC or logical grouping of SACs documented the scheduled completion, the audit trail and results of the reviews. The final data sheets with lessons learned by the sites were transmitted to you with our July 15, 2005, interim report.

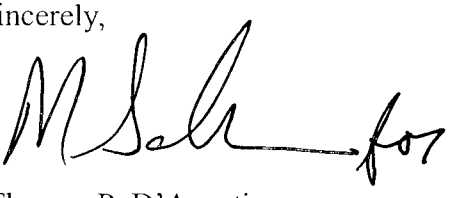
Lessons Learned in these reviews are summarized in the enclosure and will be transmitted to NNSA sites for their use as appropriate. The status of completion of these reviews and completion of corrective actions are summarized below.

- Los Alamos National Laboratory: All reviews are complete. Corrective actions will be made during the 2006 annual review cycle and in conjunction with the Operational Effectiveness Program. Corrective actions will be complete by June 30, 2006.
- Lawrence Livermore National Laboratory: All reviews are complete. Corrective actions will be complete by September 30, 2006.
- Nevada Test Site: All reviews are complete. No corrective actions are pending.
- Pantex: All reviews are complete for implemented DSAs. Reviews for other DSAs will be completed as part of their implementation via the Integrated Implementation Plan. No corrective actions are pending.

- Sandia National Laboratories: Review of the Annular Core Research Reactor will be completed by August 31, 2005; SACs for the Gamma Irradiation Facility and On-Site Transportation will be incorporated into the normal implementation reviews of pending major revisions to their DSAs. No corrective actions are pending.
- Savannah River Site/Tritium: All reviews are complete. No corrective actions are pending.
- Y-12 National Security Complex: Reviews for all facilities other than Building 9212 will be completed via Implementation Verification Reviews as part of the 2005 annual review cycle and will be completed by December 31, 2005. Approval of the Building 9212 DSA is pending. SAC implementation will be incorporated into the normal implementation reviews.

If you have any questions about this submission or about our path forward on this or other NNSA obligations under the implementation plan, please contact me or have your staff contact Jeff Underwood at 301-903-8303.

Sincerely,



Thomas P. D'Agostino
Acting Deputy Administrator
for Defense Programs

Enclosures

cc w/enclosure:
M. Whitaker, DR-1
J. McConnell, NA-2.1
E. Morrow, NA-3.6

w/o enclosures:
R. Black, EH-22
R. Englehart, EH-22
T. Wright, EM-3.2
Manager, Pantex Site Office
Manager, Y-12 Site Office
Manager, Savannah River Site Office
Manager, Los Alamos Site Office
Manager, Livermore Site Office
Manager, Sandia Site Office
Manager, Nevada Site Office

DNFSB 2002-3 Site Lessons Learned from Administrative and Field Implementation Reviews of Specific Administrative Controls

Lawrence Livermore National Laboratory:

Exact quantities of Special Nuclear Material stored in waste drums or boxes cannot be exactly determined without following rigorous validation and assay procedures.

Y-12 National Security Complex:

Utilizing a multi-disciplined team for document review ensures the coverage of issues regarding operations and compliance.

Conduct regular interface between responsible Federal and contractor personnel to ensure that identified Specific Administrative Controls (SACs) and their purpose are fully understood by all interested parties.

Sandia National Laboratories:

Take advantage of safety-based reviews to identify, annotate and act upon identified issues such as those discovered in connection with the Sandia Pulse Reactor Facility (SPRF) review.

Compare SAC identified controls/issues and proposed corrective actions with hazard analyses to determine the accuracy and usability of the hazard analysis process and to determine if an acceptable level of risk exists.

Pantex Plant:

List individual attributes of the controls separately. This makes verification of implementation easier. Also, only the attributes of the action that contribute to the safety function should be listed (i.e., do not include actions that do not directly relate to the control).

The type of procedure or training to be applied needs to be stated. In the accident analysis, the reliability of the control depends on the method of implementation. Therefore, the method of implementation (step-by-step vs. reference procedure) needs to be stated.

The actual procedure where the control is implemented should be listed in the control description. This makes change control easier.

The personnel who will be writing the procedure and those who will be implementing the procedure need to be involved in writing the control to assure it is clear and can be implemented. This will save time during implementation.

When the same control is documented in different DSAs, the wording should be exactly the same. This will make implementation easier.

The level of detail to be captured in the Technical Safety Report needs to be determined and agreed to with the DOE/NNSA organization.

The method to flow training requirements into the implementing documents needs to be established based on the site-specific training program.

For each control, an 'owner' needs to be established when the control is being developed. If this is not done, there is a good chance there will be incomplete review of the control during development and changes will be needed during the implementation.

Department of Energy

National Nuclear Security Administration
Washington, DC 20585
November 25, 2003

MEMORANDUM FOR MANAGER, SANDIA SITE OFFICE
MANAGER, PANTEX SITE OFFICE
MANAGER, LIVERMORE SITE OFFICE
MANAGER, NEVADA SITE OFFICE
MANAGER, Y-12 SITE OFFICE
MANAGER, SAVANNAH RIVER SITE OFFICE
MANAGER, LOS ALAMOS SITE OFFICE
MANAGER, KANSAS CITY SITE OFFICE

FROM Everet H Beckner
Deputy Administrator
for Defense Programs

SUBJECT **ACTION** DEFENSE NUCLEAR FACILITIES SAFETY BOARD RECOMMENDATION 2002-3

On June 26, 2003, the Secretary of Energy approved the Department's implementation plan for Defense Nuclear Facility Safety Board (DNFSB) Recommendation 2002-3 In the intervening months your staffs have made valuable contributions to preparation of Commitment 4 1 (a report on the current requirements and guidance for administrative controls) and Commitment 4 2 (a Nuclear Safety Technical Position) prepared by the Assistant Secretary for Environment, Safety and Health We are now approaching the January 30, 2004, deadline for submission of the National Nuclear Security Administration's first deliverable - Commitment 4 6 1, to provide a schedule for conducting field reviews of existing administrative controls to ensure they are developed, implemented, and maintained in accordance with the Department of Energy expectations

Commitment 4 6 1 (due to the Board prior to January 30, 2004) lays the basis for the deliverables called for in Commitment 4 5 (due to the Board prior to December 30, 2004) and Commitment 4 6 2 (due to the Board prior to June 30, 2005) Please provide your site's data/information for each of these three commitments on the attached control log and data sheets according to the dates indicated in the accompanying instructions Where possible please provide the information as soon as your site's actions for a particular commitment are completed rather than waiting for the deadline (We will make partial submissions for Commitments 4 5 and 4 6 2 for those sites completing them prior to the commitment date) If your site has no administrative controls subject to DNFSB Recommendation 2002-3 please submit a negative report

To ensure coordination on this issue, please have your lead contact Xavier Ascanio at 301-903-3757 or Jeff Underwood at 301-903-8303 to discuss any questions you may have

Attachment

Site _____ Date _____

<Insert Site Name>

DNFSB 2002-3 Commitment 4.5/4.6 Data Sheet Control Log

Data Sheet #	Control (Short Title)	Facility	4.5 Scheduled/Complete	4.6.2 Scheduled/Complete	Last Updated
	(From the data sheet)	(per DSA)	Date/(Y/N)	Date/(Y/N)	Mm/dd/yy
Site - 1					
Site - 2					
Site - 3					
Site - 4					

Instructions.

1. Assign each data sheet a control number composed of the site name and a sequential number, i.e. SRS – 1. Give each control a short title and repeat that short title in bold type in Question 1 on the data sheet. Add lines to the table as needed. Delete the instructions for the control log and the italicized instructions on the data sheet when filling them in. Consider printing the control log in landscape view to allow more complete references to each control and its facility. The control log is intended to provide a quick summary of the site's completion of the two commitments. It's also a convenient way to ensure that the data package is complete.

2. Sites whose Documented Safety Analyses implementation plans combine administrative controls into distinct groups of controls may find it useful to submit a single data sheet for a group of controls that are reviewed and verified as a unit. These consolidated data sheets should list each individual control in Item 1 so reviewers can clearly identify those controls to which Recommendation 2002-3 applies, however the control log can identify the consolidated data sheet by the name given to the group of controls.

3. The data package can be filled out by either site office or contractor personnel, as each site determines most appropriate, however the final package should be sent over the site office manager's signature.

4. In the "4.5 Complete" and "4.6.2 Complete" blocks of the control log give the dates by which the site plans to complete the reviews called for by each commitment. When they're completed, put the actual date.

Site _____ **Date** _____

5. Update Data Sheet Control Log and submit all data sheets electronically prior to the dates called for in the data sheet, preferably as a single file, or as multiple files if that's more convenient. Submit as PDF file if possible to ensure no inadvertent changes to the data and to facilitate combining into a single report for submission to the DNFSB.

6. Early submission of packages is encouraged. We'll make partial submissions of Commitments 4.5 and 4.6.2 to the DNFSB for sites that have completed those actions as packages are received, followed up by a single concluding submission when all packages are completed.

7. These submissions fall within the requirements of the Deputy Secretary's letter of August 6, 2003, and should be shared with each local DNFSB site representative or cognizant engineer at DNFSB Headquarters as appropriate for your site prior to submission to HQ. Submission to HQ for consolidation into a report to the Board should be over the Site Manager's signature, however the data package forwarded over the manager's signature can be digital media (preferably a CD or an email attachment via ENTRUST containing the data file.)

8. New data sheets can be added after the initial submission if additional controls are identified as being "Specific Administrative Controls" as described in the Nuclear Safety Technical Position Paper or the subsequent interim rule guidance. If a control previously included in a submission to the Board is later found not to require submission please provide a revised data sheet explaining the reclassification in the answer to the first question, leave other questions as they are on that date, and take no further 2002-3 actions on that control.

9. UCNI files should be sent electronically via ENTRUST. Classified files should be submitted on a CD or sent via Secure Net to underwoj@gtn-mail.gtn.doe.gov. (Please call 301-903-8303 to alert HQ to the classified email.) Please have all submissions given a classification review prior to submission and indicate the completion of that review on the forwarding letter – either as a statement in the letter or via the standard review stamp and signature on the package.

Site _____ Date _____

DNFSB 2002-3 Commitment 4.5/4.6 Data Sheet # _____

1. **Administrative Control** *(Repeat in bold type the short title that's used on the control log, then state the control as it's written in the safety basis. Cite the authorization basis document that specifies the control. If the control is lengthy give a short summary and indicate that it's a summary.)*

2. **Facility.** *(As it is called in the Documented Safety Analysis.)*

3. **Commitment 4.6** *(Complete with data to satisfy Commitment 4.6.1 and submit to NA-10 by January 16, 2004, to support submission to DNFSB by January 31. 2004. Submit completed forms to NA-10 when reviews satisfying Commitment 4.6.2 are completed and not later than May 30, 2005 to support submission to DNFSB by June 2005.)*

   a. Field reviews. *(In submission to satisfy Commitment 4.6.1 provide schedule for reviews and other data/information required to satisfy Commitment 4.6.1. Indicate where site constraints will prevent conducting reviews in time to satisfy Commitment 4.6.2 and provide the time line for completion. In submission of fully completed data sheets to satisfy Commitment 4.6.2 describe the reviews conducted to fulfill Commitment 4.6.2. If review is done as part of Readiness Assessment (RA) or Operational Readiness Review (ORR) reference the RA/ORR report. Otherwise provide short paragraph describing how implementation was reviewed.)*

   b. The following Lessons Learned were developed during this confirmation. *(Lessons Learned are practices or other observations that might be of value to other sites in maintaining a 10 CFR 830 compliant safety basis. HQ may extract these verbatim from the data sheet, compile them into a single document, and provide them to the site offices for their use as appropriate.)*

   c. Plans and schedules to resolve any outstanding implementation deficiencies identified during these reviews. *(Complete for submission of the fully competed data sheet to satisfy Commitment 4.6.2. Provide planned actions and completion dates.)*

4. **Commitment 4.5** *(Complete as controls are identified/reviewed and submit to NA-10 by November 30, 2004, to support December 30, 2004 submission to DNFSB. Complete to reflect the current status when submitting the data/information for Commitment 4.6.1.)*

   a. Confirmation per Commitment 4.5. *Describe how the site confirmed that the requirements and guidance regarding critical administrative controls are properly treated for this control in the safety basis documents and subsequent implementing procedures and controls for individual facilities. (If initial review for approval of original submission is considered adequate, state that, reference the Safety Evaluation Report (SER), or SERs as appropriate, by title and date, and state that no further review is necessary. If a subsequent review is conducted for any reason, cite the documentation in the next data sheet submission and briefly describe the review.)*

Site _____ **Date** _____

b. The following Lessons Learned were developed during this confirmation. *(Lessons Learned are practices or other observations that might be of value to other sites in maintaining a 10 CFR 830 compliant safety basis. These may be extracted verbatim from the data sheet, compiled into a single document, and provided to the site offices for their use as appropriate.)*

c. Corrective Actions needed, including schedule for their completion. *(Include both contractor and federal actions. If actions pertain to more than one control they may be described on the first sheet and then referenced on data sheets with subsequent control numbers.)*