

**Department of Energy**

Washington, DC 20585

AUG 20 2007

The Honorable A. J. Eggenberger
Chairman
Defense Nuclear Facilities Safety Board
625 Indiana Avenue, NW, Suite 700
Washington, DC 20004-2901

Dear Mr. Chairman:

Enclosed is the Corrective Action Plan (CAP) developed for Environmental Management Headquarters for the self assessment performed earlier this year on Safety Functions and Responsibilities Associated with Nuclear Facilities. The CAP contains actions to address the one finding and four observations identified by the review team.

The self assessment was provided to the Board on April 4, 2007, to complete Commitment 9C in the Implementation Plan for 2004-1, *Oversight of Complex, High-Hazard Nuclear Operations*.

Sincerely,

A handwritten signature in cursive script that reads "Inés R. Triay".

Dr. Inés R. Triay
Chief Operating Officer for
Environmental Management

Enclosure

cc:

M. Whitaker, HS-1.1



**Department of Energy**

Washington, DC 20585

August 17, 2007

MEMORANDUM FOR DISTRIBUTION

FROM:

*for**Barbara D. Helms*
CHARLES E. ANDERSON
PRINCIPAL DEPUTY ASSISTANT SECRETARY FOR
ENVIRONMENTAL MANAGEMENT

SUBJECT:

Corrective Actions for Environmental Management
Headquarters Safety Functions and
Responsibilities Associated with Nuclear Facilities

In the recent self-assessment of the Safety Functions and Responsibilities associated with Nuclear Facilities at Environmental Management (EM) Headquarters (HQ), the Office of Safety Management and Operations identified one finding and four observations. The March 2007 self-assessment is available on the EM portal. The attached corrective actions plan identifies actions needed to strengthen the HQ implementation of the requirements.

Individuals in the appropriate offices have been identified to lead in the completion and closure of specific actions; the Deputy Assistant Secretary for Safety Management and Operations will serve as the responsible manager overall. The results will be reexamined at several intervals in this plan. I ask that you support timely and successful completion of this effort.

If you have any further questions, please call Mr. Dae Chung, Deputy Assistant Secretary for Safety Management and Operations, at (202) 586-5151.

Attachment

cc:

J. Rispoli, EM-1

J. Fiore, EM-1.2



Corrective Action Plan for EM Headquarters Safety Functions and Responsibilities Associated with Nuclear Facilities

The Office of Safety Management and Operations conducted a self-assessment of Environmental Management (EM) Headquarters (HQ) safety functions and responsibilities associated with nuclear facilities during May 2007. The self-assessment was conducted in accordance with the Deputy Secretary of Energy's December 27, 2005, memorandum. The team identified one finding and four observations. The team found that the assignments of nuclear safety responsibilities were identified and specifically assigned. In many cases, the team noted formal implementing processes for carrying out the responsibilities. In a few instances, the team identified areas where a formal process or set of expectations could improve performance.

Finding and Observations

The review team noted that the EM Functions, Responsibilities and Authorities document (FRA) is not current. EM reorganized in 2006 and has yet to adopt an approved FRA that reflects the current organization. The team notes that the draft FRA is in the final stages of review and is expected to be issued within the next few months.

Some managers have received 2007 safety delegations without meeting the new five-year Senior Technical Safety Manager (STSM) recertification requirement. EM-60 should ensure future managers meet the new STSM recertification requirement or establish compensating or corrective actions prior to recommending approval of the safety delegation(s).

The statements chosen by the team for analysis do not identify prescriptive requirements for the process that carries them out. However, the team feels EM would benefit through formalizing some of these processes and in particular, the review of Startup Notification Reports (SNRs). This could be done by incorporation into the existing Oversight Standing Operating Policy and Procedure (SOPP) or through other direction to the support staff. This guidance might require a quarterly report on the results of a review of the SNRs and identification of issues, expectations for the conduct of the review and expectations for site visits and reviews of field restart processes.

EM cannot demonstrate a process that ensures the annual fire protection summary is provided to the Office of Health, Safety and Security. By extension, it is possible that the other reports required by the Order are similarly handled in an informal way. EM HQ may benefit by developing a tracking system to ensure the reports are generated and forwarded in compliance with the Order. Alternatively, the appropriate managers could provide written direction to support staff on expectations for ensuring the tasks are carried out.

EM has not fully developed a formal process to review Requests for Proposals and existing contracts to ensure that the appropriate DOE safety management and Directives requirements are included. EM HQ should determine which support organization is best qualified to perform the task and develop a process to ensure a competent review occurs.

Responsible Leads: Dae Chung, Deputy Assistant Secretary for Safety Management and Operations will have the overall responsibility for the Corrective Actions. Specific leads for each corrective action are provided in the attached table.

Effectiveness Verification: Status of this corrective action plan is to be tracked monthly as a Quality Assurance function of Office of Safety Management. An assessment is to be performed after the listed corrective actions are complete and no later than one year from the date of this memorandum.

Corrective Action Details: See attached table.

Table 1. Corrective Action Plan

Number	Issue Description	Corrective Actions	Deliverables	Responsible Manager	Planned Completion Date	Effectiveness Verification
Finding 1.0	The EM FRA is not current	1.1 Develop a new FRA that reflects the current EM Organization	A draft FRA with internal concurrences from the EM HQ DASs	EM-60 Chung	Completed, June 2007	See CA 1.3
		1.2 EM-1 approval of the revised FRA	Signed approval and distribution of the revised FRA	EM-3 Triay	Completed, July 11, 2007	See CA 1.3
		1.3 Each DAS to benchmark their office procedures, SOPPs, and assignments (etc.) against the revised FRA to assure compliance	Benchmarking results provided to EM-2	EM HQ DASs	Oct. 31, 2007	
Observation 2.0	EM Managers received delegations without current STSM qualifications	2.1 Revise SOPP to require STSM qualification status to be considered for delegations	Revised SOPP PS-5.15	EM-61	Oct. 5, 2007	See CA 2.2
		2.2 Update delegations matrix questionnaire and table to include STSM qualification	Revised questionnaire	EM-61	Nov. 2, 2007	EM-60 Assessment, Sept. 30, 2008
Observation 3.0	Some Nuclear Safety Order requirements do not have prescriptive	3.1 Develop a list of Nuclear Safety responsibilities	Provide each EM HQ manager with a specific list of responsibilities assigned from the	EM-61	Oct. 5, 2007	See CA 3.3

	processes to ensure completion		FRA			
		3.2 Review assigned responsibilities for potential process improvements	Each EM manager to perform self-assessment of responsibilities	EM HQ managers as appropriate	Nov. 16, 2007	See CA 3.3
		3.3 Implement required process changes		EM HQ managers as appropriate	April 4, 2008	EM-60 Assessment, Sept. 30, 2008
Observation 4.0	Some required Reports do not have processes to ensure they are provided	4.1 Develop a list of required reports from Nuclear Safety orders	Provide each EM HQ manager with a specific list of required reports assigned from the Nuclear Safety orders	EM-61	Oct. 5, 2007	See CA 4.3
		4.2 Review assigned responsibilities for potential process improvements	Each EM manager to perform self-assessment of required reports	EM HQ managers as appropriate	Nov. 16, 2007	See CA 4.3
		4.3 Implement required process changes		EM HQ managers as appropriate	April 4, 2008	EM-60 Assessment, Sept. 30, 2008
Observation 5.0	EM has not developed a process to ensure RFPs and contracts have appropriate directives	5.1 Develop a list of Directives and Rules common to most EM work scope and contracts to use as a review checklist	List of Directives and Rules common to most EM contracts	EM-50 (with input or concurrence of EM-60)	Oct. 5, 2007	See CA 5.3

		5.2 Implement a process for each DAS to review RFPs for their cognizant Directives requirements	Process included in Concept of Operations for the Acquisition Machine	EM-51	Nov. 16, 2007	See CA 5.3
		5.3 EM-52 perform self-assessment of Directives in contracts and EM-51 perform self-assessment of Directives in RFPs	Self-assessment results provided to EM-2	EM-51 and EM-52	Dec. 31, 2007	