

Department of Energy

Washington, DC 20585

MAY 0 1 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:

The Office of Environmental Management (EM) has completed its portion of Commitment 22C in the Department of Energy's (DOE) Implementation Plan (IP) to Improve Oversight of Nuclear Operations, dated October 2006. This IP was in response to the Defense Nuclear Facilities Safety Board Recommendation 2004-1, *Oversight of Complex, High-Hazard Nuclear Operations*. Commitment 22C is to issue an approved EM Integrated Safety Management System Description (ISMSD) within six months of the DOE M 450.4-1, "Integrated Safety Management System Manual," dated November 1, 2006.

My staff has worked closely with the Office of River Protection and Richland Operations Office to ensure we appropriately captured the Headquarters-Field relationship. To ensure we have adequately captured EM Management Systems and the Performance Objectives Measures and Commitments supporting the ISM guiding principles and core functions each EM Deputy Assistant Secretary (DAS) has reviewed the document.

There are currently some identified gaps between the requirements of DOE M 450.4-1 and the enclosed EM ISMSD, particularly in the area of implementing mechanisms. These gaps are identified in section 8.4 of the ISMSD. As we move toward full implementation of the EM ISMSD over the required two years, the efforts of the Roles, Responsibilities, Authorities and Accountabilities (R2A2) Working Group will significantly influence our Headquarter's implementation efforts. The efforts of the R2A2 Working Group will be captured in the annual updates of the EM ISMSD.

The EM ISMSD is a living document and we will continue to improve it as we gain experience in implementing it.

If you have any comments or questions, please call me at (202) 586-0738 or Mr. Dae Y. Chung, Deputy Assistant Secretary for Safety Management and Operations, at (202) 586-5151.

Sincerely,

Inés K. Triay

Chief Operating Officer for Environmental Management

Enclosure

cc:

M. Whitaker, HS-1.1