

REMARKS

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Introduction

I thank you for the opportunity to once again meet with you. I was asked to share with you some of my thoughts as to policies, initiatives and priorities that EFCOG might well focus on during the next year. As you know, the Department of Energy (DOE) and its contractors are engaged in a wide range of activities. The Defense Nuclear Facilities Safety Board's (Board) involvement is limited to defense nuclear facilities and more explicitly, the safety of work done in support of the weapons program and the cleanup of residuals of past production. My remarks should be taken in that context.

Safety Policy:

With respect to new policies, I have noted that some contractors have set forth as the introductory to the description of their safety management program, a statement of policy that expresses their philosophical approach to safety. I believe that such expression and commitment by top management to be very important.

Various versions in the form of goals have been published over the years. I mentioned one set in the brief treatise I wrote on Integrated Safety Management (DNFSB/Tech-16). That vintage set was developed to help guide the development of nuclear power of the 1960's. Briefly stated that set advocated that:

- “(1) There must be no release of radioactive material in dangerous quantities from a nuclear facility to the general public. —There must be no “Public Safety Accidents.”
- (2) The likelihood of a serious accident which would result in severe damage to a nuclear facility should be kept as small as possible. . . . The “Economic Accident” should be prevented.
- (3) Every reasonable effort should be made to eliminate accidents involving plant employees. —The frequency of the “Industrial Personnel Accident” should be reduced to the lowest possible level, certainly lower than that of other comparable industries.
- (4) System malfunctions and deviations from normal behavior should be reduced to a minimum, especially since a system with minor faults is more likely to develop major ones. —The number of “Operational Problems” should be kept to a minimum.”

Secretary of Energy, Bill Richardson, by a Policy Statement on Integrated Safety Management, October 1, 1998, affirmed DOE's commitment to:

- The Goal of safety excellence and its attainment through the principles of Integrated Safety Management.

- Strict adherence to the policy of “zero tolerance” for accidents that result in life-threatening injuries on major environmental contamination.
- A work environment for both Federal and contractor employees that fosters free and open expressions of safety concerns. Workers must have no fear of reprisals or retaliation.

More recently, Los Alamos National Laboratory (LANL) management issued a set that expresses as policy LANL’s safety management objectives. These state simply and concisely: “Safety is first at LANL. We will never compromise safety for operational needs. . . the employees, contractors and guests of the Los Alamos National Laboratory will strive to have:

- ZERO injuries and illnesses on the job
- ZERO injuries and illnesses off the job
- ZERO environmental incidents
- ZERO ethics incidents
- ZERO people mistreatment incidents
- ZERO safeguards and security violations”

While we know that a totally risk-free work environment is not something we can achieve, striving to come as close to that ideal is an objective that we should target for our safety management efforts. It would be worthwhile for EFCOG to work with DOE to establish a mutually acceptable expression of safety philosophy to which both DOE and contractors could subscribe.

New Initiatives:

Rather than challenge you with major, new initiatives, I would urge you to work more aggressively and effectively on those that are currently works in progress. As to priorities, these have to be linked first, to the needs of the weapons support program (operational facilities and associated activities) and secondly, to the stabilization and safe storage of highly hazardous residuals of the weapons past production program. As you know these two programs are funded and administered by separate program Secretarial Offices of the DOE—the new National Nuclear Security Administration (NNSA) and Environmental Management (EM). The question of priorities needs to be addressed from a somewhat different perspective for each of these programs.

Weapons Program:

The operational weapons program faces the challenge of maintaining the nations nuclear weapons stockpile in deployable state, dismantling those weapons declared excess, and safely storing residual materials until safe disposition of the excess is made. This must be done under the same constraints our society demands of the commercial industry for ensuring protection of the public, workers and the environment. Satisfying these demands is requiring upgrades of aged facilities, the retooling of processes, and the re-alignment and re-training of work forces. These upgrade efforts must be prioritized to be in synchronism with DOE's customer needs: namely the

Department of Defense (weapons availability/reliability) and the State Department (non-proliferation). The Board has targeted its safety oversight efforts for this year (Reference: Tenth Annual Report to Congress, February 2000 and FY 2001 Budget Request to Congress, February 2000) on the weapons support work at Pantex, Oak Ridge Y-12, Savannah River Tritium Production and the Weapons Laboratories.

Environmental Management:

The challenge for years for the EM program has been to prioritize the multiplicity of tasks involved in cleanup and dismantlement of facilities no longer needed to support the defense mission and in managing and safely disposing of residual wastes. The Board's views on priorities have been made clear by its advisories to DOE. The Board has consistently advocated priority attention to the stabilization and safe storage of residual radioactive materials. The line of reasoning is that once such materials have been safely dealt with, DOE has much more time to perform final cleanup and dismantlements. DOE has worked out with EPA the concept of rendering contaminated facilities sufficiently safe as to enable them to be put into a queue, awaiting final cleanup and dispositioning. This is defined as a "non-time critical remediation" status.

While a case for such prioritization can be made from risk considerations, it is also supported by funding realities. Neither the Administration nor Congress is willing to allocate enough funds to address simultaneously all the remediation tasks facing the EM program office. Further, indications are that flat funding in the future is all that can be expected. Flat funding in reality means less real funding because inflation will erode buying power. You contractors will be called upon to help DOE develop priorities. My advice to you, consistent with Board advice to DOE, is to focus on the residual materials in unstable form, move them to get them into safe forms for storage until final disposal can be effected. The Board's most recent views on priorities have been given to DOE in our Recommendation 2000-1 and the Performance Goals identified for Congress in support of the Board's FY 2001 Budget Request, February 2000.

Candidate areas for Board and staff reviews include:

- High Level Waste (HLW) Treatment at Savannah River, Hanford, Idaho National Engineering and Environmental Laboratory.
- Pu metals and oxides at Savannah River, Rocky Flats, Hanford, Lawrence Livermore National Laboratory, and Los Alamos National Laboratory.
- Pu-bearing solutions and residues at Savannah River, Rocky Flats and Hanford.
- U-233 at Oak Ridge, neptunium and americium solutions at Savannah River.
- High Enriched Uranium (HEU) at Savannah River.
- Pu storage facilities at Savannah River and Hanford.

Integrated Safety Management:

A record of work performed safely is absolutely necessary to sustain Departmental, Congressional and public confidence in the services you are providing or hope to provide. That confidence is shaken every time some mis-hap occurs anywhere in the complex that gives cause to question. The safe management of all hazardous activities must be given priority attention on a continuing basis.

The concept of Integrated Safety Management (ISM) has been adopted by DOE as the foundation and basic framework it wants used in structuring safety management programs. It is a framework that is adaptable to the wide range of activities that you are contracted to perform. ISM offers something that DOE contractors have been seeking for years—institutional consistency on generally applicable requirements—with adaptability to specifics of the work place. The functions and principles of ISM are in effect a "Safety Constitution" whereby functions and principles, rights and responsibilities are defined. An unstated but inherent responsibility is the preservation of its core values. A large measure of that responsibility rests with those of you who serve as "Energy Facility Contractors".

As you know, DOE has targeted September 2000 as the date for complex wide implementation of Integrated Safety Management. Assessments by DOE show varying degrees of maturity at sites and facilities across the DOE complex. None the less, it appears that the basic framework for ISM will be in place complex wide by the September target date. If so, this will indeed be a very commendable achievement. However, all of you well know that you cannot declare victory and rest on those laurels. Safety is a laurel that must be won every day.

Without in any way belittling the very substantial progress in implementation, it would be a mistake to treat the state of infusion of ISM concepts as of September 2000 as a program completed. While hopefully the principles and tools for integration of work planning and safety planning will be in place by that date, the exercise of those principles and the effective use of tools must be a continuing process. Further, they must be imbedded deep into the work force at all levels. The verification efforts to date make it quite clear that the confidence level that may be merited by status as of September 2000 can be increased by (1) the judicial upgrading of authorization basis documentation in some cases, (2) the improvement of hazards assessments and work planning at the activities level, and (3) added attention to the systems that are important to safety. The Board's most recent recommendation to DOE, Recommendation 2000-2, *Vital Safety Systems*, emphasizes the importance of added attention to systems important to safety. Many of such systems are aged and approaching the end of reliable service. Objective assessments of dependability for the vital functions they are intended to serve are in order with replacement or enhanced care taken as needed.

Summary:

The EFCOG must not only effectively support DOE's weapon mission but also provide good stewardship of the aging facilities whereby this mission is accomplished. Demonstrable effectiveness in doing work safely is vital for those vying to serve the government in these capacities.

- EFCOG should work with DOE to arrive at a mutually agreeable statement of safety management philosophy.
- All energy facility contractors should work diligently to embed deeply the principles and functions of Integrated Safety Management at all levels of their workforce.
- Safety upgrades in work planning/safety planning should focus upon initiatives already in progress.
- Added attention needs to be given the reliability/serviceability of systems in the DOE's aging operational complex that are relied upon to serve vital safety.