

John T. Conway, Chairman  
A.J. Eggenberger, Vice Chairman  
Joseph J. DiNunno  
John E. Mansfield  
Jessie Hill Roberson

## **DEFENSE NUCLEAR FACILITIES SAFETY BOARD**

625 Indiana Avenue, NW, Suite 700, Washington, D.C. 20004-2901  
(202) 694-7000

00-0001360



July 10, 2000

The Honorable T. J. Glauthier  
Deputy Secretary of Energy  
1000 Independence Avenue, SW  
Washington, DC 20585-1000

Dear Mr. Glauthier:

The Defense Nuclear Facilities Safety Board (Board) understands that you have tasked staff to develop an action plan for furthering the implementation of Integrated Safety Management throughout the Department of Energy (DOE) complex beyond the goals established by you and The Secretary of Energy for September 2000. Among matters being considered is the future role of the special Safety Systems Management Team (SMIT) that has spearheaded this effort thus far. The Board understands that one concept under consideration is the transitioning of the SMIT function to the Office of the Assistant Secretary for Environment, Safety and Health (EH). Your decision relative to this matter will affect the safety management of defense nuclear facilities. Hence, the Board wishes to offer its counsel on this matter.

The Board and DOE have worked together during the past five years to upgrade DOE's Safety Management program, using a fundamental concept called Integrated Safety Management (ISM). You and Secretary Richardson have been highly supportive of this concept and have done much to effect implementation. Integrated Safety Management is based upon the fundamental principle that line management is primarily responsible for safety: i.e., those responsible for performing the work. As currently organized, the personnel in DOE's EH organization are not in the line. They do provide an independent assessment, on behalf of your office, of how well safety is being accomplished by the line, and that is important. The Board has encouraged DOE to take actions to strengthen the role of EH in assuring that safety is accomplished by the line. However, to endow that office with responsibilities and authorities that are essentially those of line management will be counter-productive.

The progress made in DOE's implementation of ISM has resulted largely from actions by DOE's line management and its contractors. Rather than diminishing this role and responsibility by transitioning the lead for implementation of ISM to EH, the Board would prefer to see each Program Secretarial Office (PSO) designate an individual responsible to the PSO for the advancement of this safety initiative. Doing work safely is a line responsibility. Those Program Secretarial Officers who have line responsibilities must champion ISM and be accountable to you, the Chief Operating Officer, and to the Secretary of Energy. DOE should endeavor to keep separate and distinct the management role of the line and the oversight role of