



Department of Energy

Washington, DC 20585

May 28, 1996

The Honorable John T. Conway
Chairman
Defense Nuclear Facilities Safety Board
625 Indiana Avenue, NW.
Suite 700
Washington, DC 20004

Dear Mr. Conway:

I am writing to thank you for your complimentary letter to Dr. Reis dated April 30, 1996. My commitment to you is to continue to build on the foundation of the revised Department of Energy (DOE) Order 5610 Series and their related technical standards and Implementation Guide.

Your letter notes accurately that the actual implementation of these new integrated safety management requirements will require a great deal of close attention and technical cooperation. Writing new requirements is only the first step. Putting those requirements into place at Headquarters and in the field is also necessary. I am confident that we will continue as we did during the requirements development phase, using a cooperative effort directly involving the DOE's internal experts and customers. We also will continue to involve you and your staff.

Your letter also raises some concerns on the use of the draft Hazard Analysis Report (HAR) Standard (DOE-STD-XXXX-95). I understand and share your concerns which I would summarize as: (1) Do not overwhelm a common sense approach to risk reduction with numbers and (2) avoid unnecessary duplication.

As the weapons program manager and the person directly accountable for the success of these new requirements, I surely cannot afford and will not spend limited resources on unnecessary or duplicative analyses or documentation. Among other things, my charge to the small working group that will review the HAR Standard is to provide a stronger emphasis on these and related points. I will not let safety assurance or improvements get lost in a sea of paper.

However, this being said, my reading of the current draft HAR Standard is that it already encourages the analysts to use common sense. This is inherent in the graded approach concept that is emphasized throughout the document. Specific examples of what I would call simple common sense in the draft standard include the following: "The techniques selected should not be more sophisticated or detailed

than is necessary to provide a comprehensive examination of the hazards associated with the operation and its associated activities." (HAR Chapter 2; Application of the Graded Approach); and "Supporting documentation shall be referenced and summarized. Maximum advantage should be taken of pertinent existing safety analyses and design information . . ." (Chapter 3: Operation-specific Safety Structures, Systems, and Components).

If you have any questions, please call me or have your staff contact David McConagha at 301-903-3463.

Sincerely,

A handwritten signature in black ink, appearing to read 'T. Seitz', with a long horizontal flourish extending to the right.

Thomas P. Seitz
Deputy Assistant Secretary for
Military Application and
Stockpile Management
Defense Programs

cc:

M. Whitaker, S-3.1
V. Stello, DP-3
B. Twining, AL
T. Vaeth, NV
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