

**Department of Energy**

Washington, DC 20585

APR 11 1994

The Honorable John T. Conway
Chairman
Defense Nuclear Facilities Safety Board
625 Indiana Avenue, N.W.
Suite 700
Washington, D.C. 20004

Dear Mr. Conway:

Enclosed is the Charter for the task force set up to revise Technical Management Plans drafted to address the Defense Nuclear Facilities Safety Board Recommendation 93-4. The Recommendation 93-4 Implementation Plan stipulates in the Course of Action that Generic, Richland, and Fernald Technical Management Plans be developed.

Draft Technical Management Plans were submitted to you in accordance with the requirements set forth in the Recommendation 93-4 Implementation Plan. However, concern was expressed over the content of the draft plans, and it was suggested that the Department identify core requirements and responsibilities of Department staff charged with the management and oversight of Environmental Restoration Management Contractors in greater detail. To address these and other concerns, a general plan of action was developed and a task force created, as indicated by the enclosed charter.

The Department will keep you formally apprised of progress on the Technical Management Plans through the reporting requirements of Recommendation 93-4, and copies of the plans will be provided to you as they are completed.

Sincerely,


Thomas P. Grumbly
Assistant Secretary for
Environmental Management

Enclosure



cc:

R. Whitfield, DOE/EM-40
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J. Fiore, DOE/EM-42
K. Chaney, DOE/EM-42
D. Kozlowski, DOE/EM-424
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R. Freeburg, DOE/RL
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CHARTER FOR REVISION OF THE
GENERIC TECHNICAL MANAGEMENT PLAN
TO MEET THE REQUIREMENTS OF
DEFENSE NUCLEAR FACILITIES SAFETY BOARD
RECOMMENDATION 93-4

The Defense Nuclear Facilities Safety Board (DNFSB) Recommendation 93-4 requires that the Department of Energy (DOE) develop a Technical Management Plan (TMP) to address technical management and oversight of Environmental Restoration Management Contractors (ERMC). The Implementation Plan (IP) stipulated that the generic TMP and the Fernald Environmental Management Project TMPs be submitted to the DNFSB on December 18, 1993. The Plans were submitted in draft on December 17 and 15, 1993, respectively. In addition, the draft TMP for the Richland Operations Office (RL) was informally provided to the DNFSB in January 1994. The IP requires the RL TMP be submitted prior to resumption of ERMC activities.

Meetings were held with DNFSB staff on January 31, 1994 and February 17, 1994. At these meetings, the DNFSB staff pointed out that the draft generic and Fernald TMPs lacked some of the features specified in the Recommendation and would not be useful as overall guidance for DOE operations office personnel in exercising their technical management responsibilities. Examples included no coverage of qualifications and training requirements and only surface-level coverage of detailed technical requirements such as statutes, DOE Orders, and consensus standards. Compliance verification activities were also inadequately covered. The DNFSB staff emphasized the necessity to specifically address each of the six elements contained in Item number 2 of Recommendation 93-4. The DNFSB staff also noted the importance of keeping contract technical management requirements separate from budgetary and other administrative requirements.

To address these problems, a new approach is planned which will take as its starting point the technical requirements applicable to ERMC activities. The task has three major elements: (1) identify the essential requirements from statutes, orders, and other standards; (2) resolve conflicts and inconsistencies in these requirements; and (3) classify the core requirements by organizational element. Key personnel with technical management responsibility need to be specified. The revised draft TMP to be submitted to the DNFSB will incorporate all of these elements.

A working group will be established to perform this activity. Participants include representatives from the Fernald Environmental Management Project Division (EM-424), the Program Integration Division (EM-433), the Office of the Deputy Assistant Secretary Oversight and Self Assessment (EM-20), the Office of Environment, Safety and Health (EH), the Office of the Associate Deputy Secretary for Field Management (FM), FN, and RL. The team will be located in the Washington, D.C. area and rely at a minimum on the following information:

- Applicable Statutes and DOE Orders.
- Consensus Standards and Codes.
- Requirements Identification Documents/Standards for Fernald.
- The Office of the Deputy Assistant Secretary for Environmental

- Restoration (EM-40) Requirements Identification Matrix.
- Requirements Identification Documents/Standards for Richland, in addition to the management documentation.
- Requirements and Self Assessment Database printout from Oak Ridge and direct interaction in the database.

The current schedule calls for delivery of the generic TMP to DNFSB by May 31, 1994.

The general plan of action includes the following:

1. Identify the members of the task force.
2. Obtain EM-40 direction to proceed with the action.
3. Assemble all relevant information associated with the core requirements.
4. Assemble the team in Germantown, Maryland, with access to the EM-40 local area network and other support functions but separate from the daily work environs.
5. Divide the team responsibilities into functional areas and collect the core requirements from the identified DOE Orders, statutory requirements, regulations, and other sources of information. The functional areas will be as follows:
 - 1.0 Management Systems
 - 2.0 Quality Assurance
 - 3.0 Configuration Management
 - 4.0 Training and Qualification
 - 5.0 Emergency Management
 - 6.0 Safeguards and Security
 - 7.0 Engineering Program
 - 8.0 Construction Program
 - 9.0 Operations
 - 10.0 Maintenance
 - 11.0 Radiation Protection
 - 12.0 Fire Protection
 - 13.0 Packaging and Transportation
 - 14.0 Environmental Restoration
 - 15.0 Decontamination and Decommissioning
 - 16.0 Waste management
 - 17.0 Research and Development and Experimental Activities
 - 18.0 Nuclear Safety
 - 19.0 Occupational Safety and Health
 - 20.0 Environmental Protection
6. Once the core requirements are identified, group the requirements into logical functional areas for technical management.
7. Draft Sections of the TMP based upon the logical groupings and identify

qualifications of the personnel assigned to each functional area.

8. Obtain limited support from the Office of Assistant Secretary for Environment, Safety and Health (EH) and the Office of General Counsel (GC) in review and development of certain Sections, such as the enforcement Sections of the TMP.
9. Perform focused peer review of the draft generic TMP, with participation by EM, FM, EH, and GC representatives.
10. Develop a package for submittal by the Office of Assistant Secretary for Environmental Restoration and Waste Management/Secretary of Energy (EM-1/S-1) to the Board.
11. Submit the draft TMP to the DNFSB and the Operations Offices for review and comment.
12. Revise the draft TMP based upon comments from the DNFSB and the DOE Operations Offices.
13. Issue the final generic TMP to the DNFSB and Operations/Field Offices.

Team Membership:

- D. Kozlowski, EM-424, Team Leader
- M. McCune, EM-424
- R. Lowry, BAH
- M. Harmon, EM-442
- L. Treichel, EM-442
- K. Kelkenberg, EM-431
- S. Bertness, EM-431
- R. Arguero, BAH
- E. Hocking, ANL
- C. Majumdar, EM-23
- S. Rogers, EM-25
- D. Lawrence, Digital
- S. Peterman, DOE-FN
- D. Porco, DOE-FN
- S. Cossel, FERMCO
- C. Solomon, FERMCO
- D. C. Smith, DOE-RL
- R. Cote, Westinghouse
- L. Scott, Westinghouse

Schedule: (Attached)

Technical Management Plan Development

ID	Name	Scheduled Start	February	March	April	May	June	July	August	September	October
			Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct
1	Identify TMP Task Force	2/22/94 8:00am	■								
2	EM-40 Issue Task Force M	3/3/94 8:00am		◆							
3	Assemble and Distribute In	2/22/94 8:00am	■	■							
4	Team Identify Core Requir	3/14/94 8:00am		■							
5	Divide Requirements into F	3/21/94 8:00am		■	■						
6	Revise Technical Manage	4/3/94 8:00am			■						
7	Perform Focused PEER Re	4/17/94 8:00am			■						
8	Develop Package for EM-1	4/24/94 8:00am			■						
9	Submit TMP to DNFSB/Op	5/1/94 8:00am				◆					
10	Obtain Comments on TMP	5/2/94 8:00am				■					
11	Revise TMP and Issue Fina	5/16/94 8:00am				■					
12	Develop Package for S-1	5/23/94 8:00am				■					
13	Submit Final TMP to DNFS	5/30/94 8:00am					◆				

Project:
Date: 3/3/94

Critical



Progress



Summary



Noncritical



Milestone



Rolled Up

