



**The Secretary of Energy**  
Washington, DC 20585

August 11, 1992

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

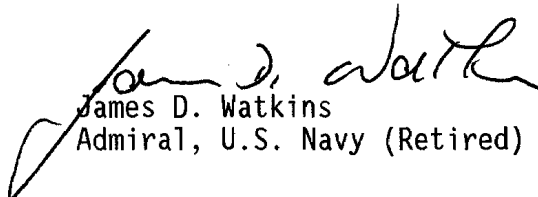
Dear Mr. Conway:

On March 27, 1991, the Defense Nuclear Facilities Safety Board (the Board) issued Recommendation 91-2, Closure of Safety Issues Prior to Restart of K-Reactor at the Savannah River Site. On May 14, 1991, the Secretary of Energy accepted the recommendation.

On December 11, 1991, the Secretary provided the Board with the remaining closure packages and advised the Board that all Reactor Operations Management Plan (ROMP) restart issues had been satisfactorily closed. These packages were reviewed by Board staff prior to the start up of the K-Reactor in May 1992. Therefore, the Department of Energy (DOE) considers its actions implementing Recommendation 91-2 complete and that the Recommendation is closed.

Finally, as part of ROMP, procedures, priorities, and schedules for items in the Reactor Safety Improvement Program (RSIP) were developed. Work toward completion of the RSIP items will continue following closure of Recommendation 91-2. The RSIP issues will be reviewed and approved by DOE using the same process developed for closure of ROMP restart issues. The Department will keep the Board fully informed of progress made and the status of RSIP in the future.

Sincerely,

  
James D. Watkins  
Admiral, U.S. Navy (Retired)

John T. Conway, Chairman  
A.J. Eggenberger, Vice Chairman  
John W. Crawford, Jr.  
Herbert John Cecil Kouts

## DEFENSE NUCLEAR FACILITIES SAFETY BOARD

625 Indiana Avenue, NW, Suite 700, Washington, D.C. 20004  
(202) 208-6400 • FTS 268-6400



August 6, 1992

The Honorable James D. Watkins  
Secretary of Energy  
Washington, DC 20585

Dear Mr. Secretary:

In accordance with Section 315(c) of the enabling legislation (P.L. 100-456) for the Defense Nuclear Facilities Safety Board, enclosed are revised comments from Allen J. Tiedman, Associate Director for Operations, Los Alamos National Laboratory in response to Board Recommendation 92-2.

Section 315(a) of the referenced legislation states, "Interested persons shall have 30 days after the date of the publication of such notice in which to submit comments, data, views, or arguments to the Board concerning the recommendations." Although the deadline for receipt of public comments on Recommendation 92-2 was July 6, 1992, the Board is accepting these comments as part of the official record of Board Recommendation 92-2.

Sincerely,

A handwritten signature in black ink, appearing to read "Kenneth M. Pusateri".

Kenneth M. Pusateri  
General Manager

Enclosure

# Los Alamos

Los Alamos National Laboratory  
Los Alamos, New Mexico 87545

DATE: July 29, 1992  
IN REPLY REFER TO: ADO-92-748  
MAIL STOP: A120  
TELEPHONE: (505) 667-9390

Defense Nuclear Facilities Safety Board  
625 Indiana Avenue, N.W.  
Suite 700  
Washington, D.C. 20004

Dear Sirs:

**SUBJECT: CLARIFICATION OF LETTER DATED JULY 9, 1992 (ADO-92-677),  
COMMENTS ON DOE'S FACILITY REPRESENTATIVE PROGRAM AT DEFENSE  
NUCLEAR FACILITIES, (57 FR 23576 AND 23578)**

Our letter of July 9, 1992 provided you comments on the DOE's Facility Representative Program at Defense Nuclear Facilities. Due to an administrative error, several key words were omitted from my letter. In addition, the specific requirement that facility representatives have a Ph.D. is a requirement that I asked to be deleted in the final draft. The wrong first page was sent out. To clarify the issue and to make clear our position, the second paragraph, last sentence, should read

As a minimum, we would like to see that DOE Facility Representatives (FR) have appropriate experience and education pertinent to those national laboratory research facilities where they have oversight.


It was never the intent to recommend that all DOE Facility Representatives must have a Ph.D. and research experience. The point that we were trying to make is that there are some DOE GOCO facilities that conduct unique operations that will require specially trained/qualified FRs to fully understand the operations being conducted.

We feel as if the best oversight of our research activities by the DOE FRs can best be served if the FRs are technically trained/educated in those activities that the FR is monitoring. While we encourage that the FRs have advanced degrees or specific research experience in these areas, (such as CMR, TA-55, Omega Site, MESON Facility, TA-18), we recognize the fact that there are DOE personnel with the technical experience that can understand the research/experiment design and protocol such that they can fully appreciate the activity involved and the concurrent ES&H concerns.

Defense Nuclear Facilities Safety Board  
July 29, 1992  
Page Two

We appreciate the opportunity to clarify this issue and fully support the responsibilities of DOE oversight of our activities.

Sincerely,



Allen J. Tiedman  
Associate Director  
for Operations

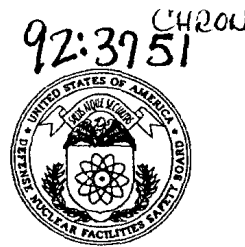
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Cy: G. VanTiem, EMO, MS K496  
EMO File, MS K496  
CRM-4, MS A150  
EMO/ORS (ADO) File

John T. Conway, Chairman  
A.J. Eggenberger, Vice Chairman  
John W. Crawford, Jr.  
Herbert John Cecil Kouts

# DEFENSE NUCLEAR FACILITIES SAFETY BOARD

625 Indiana Avenue, NW, Suite 700, Washington, D.C. 20004  
(202) 208-6400 • FTS 268-6400



July 14, 1992

The Honorable James D. Watkins  
Secretary of Energy  
Washington, DC 20585

Dear Mr. Secretary:

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Sincerely,

Kenneth M. Pusateri  
General Manager

Enclosure

# Los Alamos

Los Alamos National Laboratory  
Los Alamos, New Mexico 87545

DATE: July 9, 1992  
IN REPLY REFER TO: ADO-92-677  
MAIL STOP: A120  
TELEPHONE: 7-9390

Defense Nuclear Facilities Safety Board  
Kenneth Pusateri  
625 Indiana Avenue N.W.  
Suite 700  
Washington, DC 20004

Dear Mr. Pusateri:

**SUBJECT: COMMENTS ON DOE'S FACILITY REPRESENTATIVE PROGRAM  
AT DEFENSE NUCLEAR FACILITIES, (57 FR 23576 & 23578)**

We strongly support the recommendation of the Defense Nuclear Facilities Safety Board to establish a formal qualification program for Facility Representative positions. However, we do not believe that one set of qualifications would best serve the interests of the Department Of Energy (DOE).

The national laboratories vary greatly in their mission and scope, both among themselves and as they compare to nuclear production facilities such as Pantex or Mound. Thus the qualifications of DOE Facility Representatives at the national laboratories need to include experience in research and development, with emphasis on the research, such that they could understand environmental, safety, and health (ES&H) issues in a research environment. The national laboratories support the DOE ES&H program, but it takes a uniquely qualified person to put these issues in perspective in a research program. As a minimum, we would like to see that DOE Facility Representatives have a Ph.D. degree and research experience in the academic areas pertinent to those facilities where they have oversight.

We fully support the concept of a formal site- and facility-specific training program and would eagerly participate in this program.

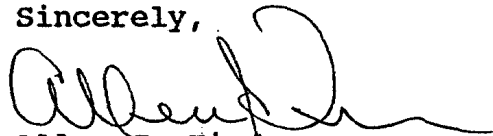
Mr. Kenneth Pusateri  
ADO-92-677

-2-

July 9, 1992

We would like to encourage the DOE to include participation from the national laboratories in developing a formal qualification program for the DOE Facility Representative.

Sincerely,



Allen J. Tiedman  
Associate Director  
for Operations

AJT: lmm

Enclosure

Cy: G. VanTiem, EMO, MS K496  
EMO File MS K496  
CRM-4, MS A150  
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