December 18, 2001

The Honorable Spencer Abraham
Secretary of Energy
1000 Independence Avenue, SW
Washington, DC 20585-1000

Dear Secretary Abraham:

The Department of Energy's (DOE) Implementation Plan for the Defense Nuclear Facilities Safety Board's (Board) Recommendation 2000-2, *Configuration Management, Vital Safety Systems*, calls for a two-phased approach for assessing the baseline operability of vital safety systems at defense nuclear facilities and developing a process for managing the actions necessary to improve and maintain the systems' operability. The initial assessment (Phase I) was intended to be a quick assessment based on readily available information. The second assessment (Phase II) was intended to be a detailed assessment of the operability of these systems.

DOE's plan calls for a detailed Phase II assessment for all confinement ventilation systems that are important to safety; for other vital safety systems, Phase II assessments are to be done based upon an evaluation of the Phase I assessments. Commitment 6 of DOE's plan, overdue since July 2001, is to provide a list of key facilities and systems that will receive a
Phase II assessment. The Board believes that both the process for selecting vital safety systems to be assessed for operability and the performance of the assessments have been highly protracted, and that DOE is minimizing the importance of these reviews.

In recent discussions with the Department of Energy (DOE), the Board was informed that DOE does not believe Phase II assessments of all confinement ventilation systems are necessary, and that only one or two Phase II assessments per site may be adequate. In lieu of conducting Phase II assessments, several sites are proposing long-term action to incorporate the criteria used for the Phase II assessments in their contractors' self-assessment programs.

Consistent with Recommendation 2000-2, the Board fully endorses long-term action to incorporate the criteria used for the Phase II assessments in contractor self-assessment programs. However, this long-term action is not a replacement for the more immediate assessments of safety system operability called for by the recommendation.

Concerning the selection of systems for which Phase II assessments will be conducted, the

Board recognizes that DOE may have sufficient information about the operability of certain confinement ventilation systems as the result of Phase I and other assessments. For these few specific cases, Phase II assessments may not be required. However, given the results of the Phase II reviews conducted to date, the Board does not consider the current plan to assess only one or two vital safety systems at each site adequate to inform DOE of the overall material condition of vital safety systems in the short term. The results of the initial Phase II assessments have demonstrated their value. The recent Phase II assessments at Idaho National Engineering and Environmental Laboratory led the site to investigate several potential unreviewed safety questions and to take actions to improve the management of its vital safety systems.

The Board and its staff are available to assist DOE in determining an appropriate list of Phase II reviews that will address the Board's concerns.

Sincerely,

John T. Conway
Chairman

c: Mr. Mark B. Whitaker, Jr.