



U.S. DEPARTMENT OF
ENERGY



Department of Energy Savannah River Operations Office Response to the Defense Nuclear Facilities Safety Board's Letter of June 14, 2024, regarding the Facility Representative Program

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*DOE-SR Facility Representatives Response to the DNFSB letter of June 14, 2024
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DOE-SR Facility Representatives Program Response

Purpose:

On June 14, 2024, the Defense Nuclear Facilities Safety Board (DNFSB) issued a letter to the Environmental Management (EM) Senior Advisor (EM-SA) regarding the DOE-Savannah River (SR) facility representatives (FR) program at Savannah River Site (SRS). The letter requested that DOE-SR provide a report and brief on five topic areas of their program:

- 1) FRs are providing adequate facility coverage,
- 2) FR assessments are of high quality,
- 3) FR management is providing the necessary guidance and safety oversight of the facility representative program,
- 4) FRs and their management are tracking safety issues and reviewing them to identify trends, and
- 5) DOE-SR is prioritizing higher risk areas for facility representative safety oversight.

1) FRs Are Providing Adequate Facility Coverage

- Revised our procedure to strengthen our processes, such as trending analysis, facility coverage, oversight, and assessment quality.
- Partnering senior FR with junior FR for coaching and mentoring.
- Established incentives to support recruiting and retaining key personnel for its FR program. All our FR positions converted from GS to EK positions.
- Operations Directors prioritize work areas for their FRs during their daily operations meetings.
- FRs are generally hired with nuclear experience (Nuclear Regulatory Commission, nuclear navy, and commercial nuclear power plants).

2) FR Assessments Are of High Quality

- Assessment templates with LOIs that support routine assessments.
- Continued to increase our resources by prioritizing our FR vacancies for hiring.
- Established an FR shared drive for lessons learned and training resources.
- Provided training for all DOE-Savannah River Operations Office (SROO) employees on conducting quality assessments and documenting issues to support trending analysis.
- Provided additional training during our FR quarterly meeting.
- Leveraging monthly Management Review Boards (MRBs).
- Reinforced adequate review for all assessments is a must.
- Hired and continuously assessing the need to hire contractors that were former FRs with years of experience to help qualify and mentor new hires.

3) FR Management Is Providing the Necessary Guidance and Safety Oversight of the FR Program

- Filled critical positions to support the FR program (Director of Operations and Assistant Manager for the Nuclear Materials Stabilization organization).
- Management Field Observations are conducted monthly by senior DOE-SROO staff, including the Manager, Deputy Manager and Chief Engineer, and are used as an opportunity to provide feedback to and interact with the FRs.
- Operations Directors provide guidance during their daily operations meetings.
- Leadership (Assistant Managers [AMs], Deputy AMs, and directors) provides feedback and guidance during their monthly MRBs.
- Completed the FR triennial assessment and used the data to improve the FR program.
- Staffed regularly scheduled Readiness Assessments (RAs) with FRs from across DOE-SROO to ensure FRs gain experience in other facilities.

4) FRs and Their Management are Tracking Safety Issues and Reviewing Them for Trends

- Revised the FR Implementation Procedure for guidance that ensured trending analyses were conducted and documented quarterly to identify targeted assessments for high-risk areas with trending activities.
- Yearly reviewed quarterly analyses at a programmatic level to verify if Site-targeted assessments are required.
- Scheduled an effectiveness review of FR Implementation Procedure during the second quarter of FY25.
- During monthly MRB meetings, the management team and staff discuss trends, facilities/operations that require additional FR oversight or potential saturation reviews.

5) DOE-SR Is Prioritizing Higher Risk Areas for FR Safety Oversight

- Organizational leadership (AMs, Deputy AMs, Engineering Director, and Operations Directors) provides guidance on the high-risk activities needing oversight, e.g., during the morning operations status meeting.
- Attending the contractor Plan of the Week, shift turnover, and scheduling meetings to prioritize oversight.
- Conducted multiple RAs that supported prioritizing oversight for high or new-risk activities inside those facilities.
- Established quarterly facility review program (lessons learned from Defense Waste Processing Facility saturation review).

Conclusion

- DOE-SROO has an effective and efficient FR program.
- The DOE-SROO is continuously looking for ways to improve its FR program, which includes recruiting, training, and retaining qualified FRs.
- DOE-SROO continues to hire facility representatives with prior experience, such as NRC inspectors, Navy nuclear experience, and private power plant experience.
- DOE SROO will continue to update your team on its FR program's continuous improvement actions to ensure it maintains an effective program that supports the safe operation of its facilities to protect its workers, the public, and the environment.



**Questions
And
Comments?**