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DEFENSE NUCLEAR FACILITIES SAFETY BOARD

625 Indiana Avenue, NW, Suite 700 Washington, D.C. 20004-2901
(202) 694-7000

March 23, 2009

Dr. Inés R. Triay
Acting Assistant Secretary for Environmental Management
U.S. Department of Energy
1000 Independence Avenue SW
Washington, DC 20585-0113

Dear Dr. Triay:

The Defense Nuclear Facilities Safety Board (Board) is conducting a series of reviews to evaluate the efforts of the Department of Energy (DOE)/National Nuclear Security Administration to reinvigorate activity-level Integrated Safety Management. Recently, the Board's staff conducted a review of work planning and control processes and their execution by CH2M-WG Idaho, LLC (CWI) at the Idaho Cleanup Project of the Idaho National Laboratory (INL). This review addressed maintenance and production work conducted within the Idaho Nuclear Technology and Engineering Center Cleanup Project. The staff found that the processes CWI uses for planning and controlling work are not always consistent with expectations cited in DOE Guide 440.1-8, *Implementation Guide for Use with 10 CFR Part 851, Worker Safety and Health Programs.* As a result, work planning and control processes and procedures fail to provide the workforce with the necessary structured approach for ensuring worker safety.

The Board's staff noted the following deficiencies, details of which are provided in the enclosed report: (1) incomplete hazard analyses, (2) complex and confusing work planning directives, (3) errors in the development of work packages for routine but not necessarily simple or low-hazard tasks, and (4) inappropriately modified hazard controls. These errors result in insufficient controls for authorized work. To compensate for these deficiencies, management relies heavily on a highly skilled and involved workforce that has been able to provide a strong last line of defense. This workforce is adequately trained and deeply involved in all other aspects of safety at INL.

The DOE Idaho Operations Office (DOE-ID) is not sufficiently involved in the oversight of work planning and control at INL. Although the Facility Representatives are active in oversight of daily work activities, DOE-ID has provided little oversight by subject matter experts in this area. During a presentation to the Board's staff, DOE-ID was unable to cite any audits or surveillances it had completed of CWI work planning and control activities. The recent assignment of one person to oversee all INL work planning and control as an addition to other responsibilities will not provide the driving force required to improve CWI's work planning and control efforts. DOE Headquarters could considerably enhance DOE-ID's oversight of work planning and control by providing the tools necessary to identify problems and drive corrective

actions. In particular, DOE-ID oversight would benefit from the issuance in the DOE directives system of a technical standard for work planning and control and a guide supporting DOE Order 226.1A, *Implementation of Department of Energy Oversight Policy*, that includes a criteria and review approach document for critical work activities.

Therefore, pursuant to 42 U.S.C. § 2286b(d), the Board requests a report within 90 days of receipt of this letter outlining actions taken or planned by DOE-ID and CWI to address the work planning and control deficiencies detailed in the enclosed report.

Sincerely,

A. J. Eggenberger
Chairman

Enclosure

c: Mr. Glenn S. Podonsky
Mr. Dennis Miotla
Mr. Mark B. Whitaker, Jr.