

The Honorable Peter S. Winokur
Chairman
Defense Nuclear Facilities Safety Board
625 Indiana Avenue, NW, Suite 700
Washington, DC 20004

Dear Mr. Chairman:

The Department of Energy's (DOE) mission relies upon well-developed and consistently implemented work planning and control programs to safely, and effectively perform work. Over the past few years the Defense Nuclear Facilities Safety Board (Board) staff has conducted numerous reviews of work planning and control (WP&C) at DOE defense nuclear facilities. These reviews have revealed some common areas of weakness. The purpose of this letter is to convey the Department's commitment and actions to improve and seek excellence in this area.

In 2011, the Department's Strategic Plan set a goal to establish a framework that combines the best wisdom of all Department stakeholders to maximize reliable mission performance. The Department has sought to improve work planning and control programs and their implementation, largely through a vertically integrated approach (program office-by-program office, site-by-site). Much of that effort is guided by the Department's implementation of Integrated Safety Management and related safety directives and regulations; responses to Board Recommendation 2004-1, *Oversight of Complex, High-Hazard Nuclear Operations*; and subsequent Board letters directed at WP&C program performance at individual DOE sites. Since the issues found by the Board staff encompass multiple sites, contractors, and program offices, the solution must be also driven by an integrated approach. While the Department has responded directly to the issues brought forth regarding particular facilities or sites, individual responses do not constitute the whole of the Department's efforts in this area. Senior DOE Management is taking measures to provide an integrated complex-wide solution.

The Department recognizes that improvement only driven by oversight is insufficient to achieve a level of broad excellence in WP&C. As such, Energy Facility Contractors Group (EFCOG) and DOE have joined forces to leverage the collective programs within the Department and lessons learned at individual DOE sites to develop a DOE-specific and state-of-the-art Work Planning and Control Program Guideline document. The document framework was based on industry benchmarks, Federal regulations, and DOE requirements and guidance.

The development of EFCOG Contractor Guideline document for WP&C, at the activity level, was initiated in June 2011. Substantive interaction between the operations, maintenance, construction, decontamination and decommissioning, and laboratory research and development communities over the last months has helped define and address some

core issues impacting the implementation of robust WP&C programs. This month, EFCOG delivered a final draft document that addresses earlier comments. Once DOE has completed its review, the DOE Central Technical Authorities will provide guidance and expectations to their organizations and contractors regarding the acceptability of the EFCOG guidelines, as part of our WP&C improvement initiative. In parallel, the Department plans to add an attachment to the upcoming DOE Guide G226.1-1, *Federal Line Management Oversight of Department of Energy Nuclear Facilities* specifically addressing work planning and control.

The Department is committed to addressing any identified weaknesses and improvements in process integration, implementation, corporate lessons learned across the DOE complex, and federal oversight.

We look forward to working with the DNFSB and remain prepared to brief you and your staff on the status of current WP&C efforts.

Sincerely yours,

Daniel B. Poneman

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