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DEFENSE NUCLEAR FACILITIES SAFETY BOARD

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April 18, 1995

Mr. Donald W. Pearman
Associate Deputy Secretary for Field Management
Department of Energy
Washington, DC 20585

Dear Mr. Pearman:

The Defense Nuclear Facilities Safety Board (Board) has been following progress toward implementation of Recommendation 92-2, *Facility Representatives* (FRs). This recommendation was written in response to our observation of highly variable FR programs throughout the defense nuclear facilities. The Board considers qualification as an FR important for two reasons. First, the FR is one of several staff positions with important safety responsibilities in the Department of Energy (DOE). Second, the FR program is a significant element of the technical qualification programs conducted under Recommendation 93-3.

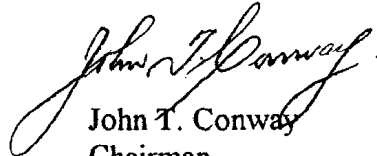
The Board has observed substantial improvements in the FR programs at several sites and facilities. The Idaho Field Office and portions of the Savannah River Field Office in particular have implemented technically robust programs that are competitive with analogous commercial programs. The Board notes that some sites have rewarded outstanding FR performance with promotions to supervisory positions and is aware that one previously qualified FR is now on sabbatical to further his education.

Most of the progress observed to date at successful and partially successful sites and facilities can be attributed to individual efforts by some Field Office personnel, as well as efforts by the Board's staff. However, many DOE site managers have not initiated an FR program more than a year and a half after issuance of DOE-STD-1063-93, *Establishing and Maintaining a Facility Representative Program at DOE Nuclear Facilities*. Little action from DOE Headquarters to address these problems has been observed.

The Board perceives that little effort is being expended to improve weak programs. The Board believes that continued career progression of technically superior FRs could be stymied by a failure to establish and implement a clear policy regarding promotion of FRs.

To that end, the Board requests that you brief us regarding measures planned for sites that have not demonstrated progress toward implementing an FR qualification program and current plans for implementing a career path for FRs. The Board received and is reviewing your quarterly report dated April 3, 1995 covering the last two quarters of 1994 and first quarter 1995. In particular, we are interested in discussing Attachment 5 *Facility Representative Personnel Guide*. To the extent that the FR program is implemented by the offices of Defense Programs, Environmental Management, and Human Resources, please ensure that the appropriate personnel are present.

Sincerely,



John T. Conway
Chairman

c: The Honorable Archer L. Durham
The Honorable Thomas P. Grumbly
The Honorable Victor H. Reis