

July 14, 2003

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

Dear Secretary Abraham:

The Defense Nuclear Facilities Safety Board (Board) received your letter dated June 26, 2003, enclosing the Department of Energy's (DOE) Implementation Plan for the Board's Recommendation 2002-3, *Requirements for the Design, Implementation, and Maintenance of Administrative Controls*. The Board has reviewed the Implementation Plan and finds that it satisfies Board Policy Statement 1 and is responsive to the issues documented in the Recommendation.

The Board agrees that DOE's Implementation Plan should ensure the reliability and effectiveness of important administrative controls in the defense nuclear complex. The Board strongly endorses the commitment to revise DOE's safe harbor methodologies under Title 10 of the Code of Federal Regulations, Part 830, *Nuclear Safety Management*, to strengthen the requirements associated with administrative controls. In addition, the Board anticipates that through the field reviews in this plan DOE will re-evaluate the rationale for selecting safety-related administrative controls in lieu of engineered safety controls, replace administrative controls with engineered controls where appropriate, and ensure that administrative controls still deemed appropriate are developed, implemented and maintained in accordance with their safety function. We look forward to reports outlining the success of your efforts.

Sincerely,

John T. Conway
Chairman

c: The Honorable Linton Brooks
The Honorable Beverly Ann Cook
The Honorable Jessie Hill Roberson
Mr. Mark B. Whitaker, Jr.