



Department of Energy  
Washington, DC 20585

June 4, 2010

MEMORANDUM FOR INGRID KOLB

DIRECTOR  
OFFICE OF MANAGEMENT

THROUGH:

KEVIN T. HAGERTY  
DIRECTOR  
OFFICE OF INFORMATION RESOURCES

NOTE: 2 ACTIONS

- REVISION

- CANCELLATION

FROM:

GLENN S. PODONSKY  
CHIEF HEALTH, SAFETY AND SECURITY OFFICER  
OFFICE OF HEALTH, SAFETY AND SECURITY

SUBJECT:

Notice of Intent to Revise DOE Order 225.1A, *Accident Investigations*, 11-26-97, and Cancel DOE Guide 225.1A-1, *Implementation Guide for Use with DOE Order 225.1A, Accident Investigations*, 11-26-97

**PURPOSE:** This memorandum provides justification for a revision to Department of Energy (DOE) Order (O) 225.1A, *Accident Investigations*, and the cancellation of DOE Guide 225.1A-1, *Implementation Guide for Use with DOE Order 225.1A, Accident Investigations*, when the revised Order is published. Major changes in this Order revision include: (1) giving line managers the responsibility to appoint Federally-led accident investigation boards, and eliminating the differentiation between Type A and Type B accidents; (2) modifying the categorization algorithm to promote more timely decision-making; (3) giving line managers the responsibility for implementing corrective action systems to address identified deficiencies; (4) and clarifying line manager responsibilities for conducting extent of conditions reviews.

**JUSTIFICATION:**

**Background:** This Order is needed to designate organizational authorities and responsibilities for conducting accident investigations, reporting the results, and establishing corrective actions to prevent recurrence. The current Order was established in 1995, revised in 1997, and replaced earlier requirements for accident investigations. HSS has program management responsibilities for DOE's accident investigation program. In this capacity, HSS provides training, support, and assistance to Program Elements through the services of investigation coordinators, and as requested, technical resource support for Federal-led accident investigation boards. HSS will provide for a quality review of all draft accident investigation reports before they are approved as final by the Board Chair.

Historically, HSS has been responsible for appointing and leading independent accident investigations under this Order. As the numbers of the most severe accidents (Type A) have

Jim CURON

Jim RECD - 6/4/10

OUT FOR REVIEW - 6/4/10

DRB DISCUSSION - 6/17/10



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decreased and the investigation capabilities of the Program and Field Elements have increased, the need for HSS to independently lead investigations has diminished. This responsibility will be transferred to the responsible Heads of Program Elements; the current Order provision that provides HSS with the authority to appoint an accident investigation board “as deemed - appropriate” is not anticipated to change. This Order focuses on requirements for Federal organizational elements. Contractor’s investigation requirements are included in 10 CFR 851, *Worker Health and Safety Program*. The few contractor requirements that exist in the current Order, such as maintaining accident response readiness teams and supporting Federally-led investigations, are not burdensome and are expected to remain in the revised Order.

**Summary of Development Process:** The revised directive will be developed using representatives from the DOE accident investigation community of interest, including representative contractors in an advisory role. The development team will review each existing safety requirement, document changes, and the bases for changes. The team will also document the rationale for retained requirements. In addition, the proposed revision will be reviewed by an executive-level, DOE management team which will include representatives from each major line program office.

**Applicability:** This Order will apply to all DOE elements except for the DOE Naval Nuclear Propulsion Program and the Bonneville Power Administration.

**Major Changes:** The revised Order is intended to provide the Heads of Program Elements the necessary authority, responsibilities and flexibility to institute an accident investigation and prevention program for activities under their cognizance. Specifically, (1) the Heads of Program Elements will have the responsibility to appoint Federally-led accident investigation boards for those incidents that have consequences meeting the algorithm criteria. In the event that the Head of a Program Element determines that an investigation is not warranted, the order will define a request for a waiver process. As deemed appropriate, the Heads of Program Elements may request, or the Deputy Secretary may direct, HSS to conduct a investigation. Additionally, HSS may elect to exercise a provision in the Order to appoint an accident investigation board. For those accidents that do not meet the algorithm thresholds that require a Federally led accident investigation board, the Heads of Field Elements may appoint a Federally led or contractor-led accident investigation board. With this Order revision, the Heads of Field Elements will be provided the latitude to appoint an accident investigation board as appropriate to address near-misses; information rich events, or a series of events that present a growing concern. (2) The accident investigation algorithm will be modified to more clearly enumerate the consequences of an accident which will require a Federally-led accident investigation board. Changes will include criteria for timelier decision-making for establishing Federally-led accident investigation boards, especially when estimating worker radiation dose thresholds and estimating property damage cost. (3) The Heads of the Program Element will ensure that appropriate corrective actions that address Judgments of Needs (JONs) are effective and tracked to closure. (4) Accident Investigation Board Chairpersons will be required to brief the Department’s senior leadership on the outcome of their investigation. The Heads of Program

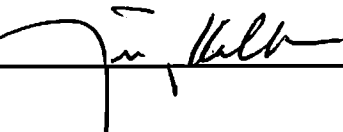
Elements will then be required to conduct an extent of condition review for specific issues resulting from the investigation that might be applicable to other work locations under their cognizance.

Portions of the Guide relating to the reporting and analysis processes will be incorporated into a new technical standard. This standard will serve as the recommended Departmental approach to facilitate standard data collection methodology for subsequent trending and analysis, as well as, the basis for development of Department lessons learned. The standard will be developed in parallel, to be issued as the same time as the revised Order. The standard will not be invoked as a requirement.

**IMPACT:** No conflicts with any other directives or requirements were identified. There exist the potential impacts with other Orders. Specifically, DOE O 414.1C, *Quality Assurance*, has historically required that Federally-led accident investigation responses be managed under the requirements of the Corrective Action Management Program and be tracked in the associated Corrective Action Tracking System. Coordination may be needed with DOE O 231.1A, *Environment, Safety and Health Reporting*, to ensure that expectations for reporting and occurrence investigations align with expectations for accident investigations. Coordination may be needed with DOE O 210.2, *Department of Energy Operating Experience Program*, to ensure that lessons learned program requirements are coordinated with communicating the results of accident investigations.

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Concur:  Nonconcur: \_\_\_\_\_ Date: 6-17-10

The Office of the Under Secretary for Energy raised concerns about eliminating the A+B categories as well as the proposal to have programs lead all reviews unless the Deputy requests that HSS lead a review. These issues will be addressed by HSS + OSE during the development of the draft order, prior to its dissemination through NEVCOM.

**Timeline: Schedule for Directives Development**

	<u>Standard</u> (Days)	<u>Proposed</u> (Days)
Draft Development (Writer)	60	60
Process/Post (MA-90)	5	5
Review and Comment (Interested Parties)	45	45
Comment Resolution (Writer)	30	45
Process/Post (MA-90)	5	5
Concurrence (Writer)	15	15
Preparation of Final Draft (Writer)	5	15
		<u>190</u>

NOTE: REQUESTING 15  
ADDTL DAYS  
FOR COMMENT  
RESOLUTION.  
RECOMMEND  
APPROVAL.

Approved