December 11, 2002: The Board issued Recommendation 2002-3, *Requirements for the Design, Implementation, and Maintenance of Administrative Controls.*

January 4, 2007: DOE informed the Board that all of the commitments in the Implementation Plan for the Recommendation had been completed and proposed closure.

January 22, 2007: The Board acknowledged the progress that had been made and indicated that its staff would conduct field reviews of a representative sample of defense nuclear facilities to independently assess the adequacy and effectiveness of the implementation of the Recommendation.

July 30, 2007: The Board issued a letter outlining a number of implementation weaknesses and deficiencies identified during the staff reviews. These included:

- providing the specificity and level of detail necessary for the controls to accomplish the desired safety objectives,
- ensuring that critical support systems for specific administrative controls are appropriately classified,
- specifying the need for independent or concurrent verification,
- crediting of safety management programs in lieu of specific administrative controls or engineered features, and
- a number of major defense nuclear facilities have not yet implemented the Recommendation.

October 23, 2007: DOE and NNSA briefed the Board on their proposed corrective actions in response to the Board's letter and staff issue report dated July 30, 2007.

Open Issues

There has been a transitory and fragmented ownership of the Recommendation.

The status of implementation and closure at individual facilities is somewhat ambiguous (vis a vis the Department's January 4, 2007 letter).

There remains an unclear direction with respect to actual field verification (i.e., whether actual reviews being conducted, and whether they are independent).

Specific Administrative Controls Verification Reviews

Hazards analysis: Review the hazard and accident analysis that generated the need for the SAC; identify important input assumptions.

Derivation of control: Review the process for selecting the SAC, based on the results of the hazard/accident analysis. Examine the design attributes used to maximize the reliability and effectiveness of the SAC.

Procedure development: Assess the process for procedure development including information related to human factors analysis, job-task analysis, and adequacy of instrumentation.

Training and qualification: Review the training and qualification requirements associated with the SAC. Assess whether the training program incorporates the materials into the initial and ongoing training requirements.

Assessments of control adequacy: Assess the process used to verify the adequacy of the SAC. Review any support SSCs or similar programs which the parent SAC depends upon.

Implementation of controls: Review the process for implementing the control, including information related to the implementation schedule, results of independent verification reviews and related assessments, periodic reverification activities and, methods used to ensure proper configuration management of the SAC. Assess the safety classification, testing, and maintenance of the required instrumentation and control systems and other support systems necessary to properly implement the control.

Root cause assessment and lessons learned: Review the results of any root cause assessment or incident investigations associated with violations or inadequacies of the control.