

**NAVAL REACTORS DOE DIRECTIVE
IMPLEMENTATION BULLETIN 225.1-95, REVISION 3**

Consistent with the Naval Nuclear Propulsion Program (NNPP) overall concept of operations, the following provides specific implementation guidance for DOE Order 225.1B, ACCIDENT INVESTIGATIONS, for those activities under the Director's cognizance. DOE Order 225.1B is implemented subject to the modifications provided below:

1. Paragraph 4.a of the Order contains requirements for determining whether an Accident Investigation Board (AIB) should be established. The Appointing Official will make this determination in accordance with NR/08 Instruction R#3, "NAVAL REACTORS HEADQUARTERS-APPOINTED ACCIDENT INVESTIGATION BOARD."

2. Responsibilities:

a. Paragraph 5.a outlines the responsibilities of the Head of Headquarters Element. Naval Reactors Headquarters fulfills the responsibilities of the Head of Headquarters Element.

b. Paragraph 5.b outlines the responsibilities of the Chief Health, Safety and Security Officer. The responsibilities identified in Paragraphs 5.b(1), 5.b(8), 5.b(9), 5.b(10), 5.b(11), 5.b(12), and 5.b(13) are applicable to the Naval Reactors Program and are fulfilled by Naval Reactors Headquarters.

c. Paragraph 5.c outlines the responsibilities of Heads of Field Elements. The Assistant Manager for Operations – Pittsburgh, Assistant Manager for Operations – Schenectady, Manager, Idaho Branch Office, and Chief, West Milton Field Office fulfill the responsibilities of Heads of Field Elements.

d. Paragraph 5.d outlines the responsibilities of the Appointing Official. The Director, Naval Reactors fulfills the responsibilities of the Appointing Official for full scope investigations. The Deputy Director, Naval Reactors, and Heads of Field Elements fulfill the responsibilities of the Appointing Official for limited scope investigations conducted in accordance with paragraph 7 below.

e. Paragraph 5.e outlines the responsibilities of AIB Chairpersons. The responsibilities identified in Paragraphs 5.e(1), 5.e(2), 5.e(3), 5.e(4), 5.e(6), 5.e(7), and 5.e(8) are applicable to the Naval Reactors Program and are fulfilled by qualified personnel specified in NR/08 Instruction R#3, subject to the modifications below:

1) Paragraph 5.e(3) states that, where there is a conflict between another government agency's requirements and the requirements of the Order, the AIB Chairperson should document the situation and obtain guidance from General Counsel and DOE's Office of Health, Safety and Security. For the Naval Reactors Program, legal

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representatives from Naval Reactors Headquarters and Naval Reactors Laboratory Field Office should be consulted.

2) Paragraphs 5.e(4) and 5.e(6) discuss reporting of regulatory noncompliance and allegations/evidence of criminal or suspected unlawful activity. For the Naval Reactors Program, such issues should be reported to the local field office. The field office will consult with senior site management as appropriate and will coordinate with Naval Reactors Headquarters to ensure that the appropriate notifications are made.

f. The Contractor Requirements Document (Attachment 1 to the Order) contains requirements applicable to accident response, scene preservation, collection of evidence, and implementation of corrective actions. The Contractor Requirements Document should be followed by the Prime Contractor in its entirety.

3. Appointment of an Accident Investigation Board:

a. Paragraph 4.c(1)(a) discusses requirements to appoint the investigation board and requires that the Appointing Official formally appoint DOE employees to an AIB within three working days of the accident categorization. Naval Reactors is a joint DOE/Navy Program; thus, for purposes of appointing an AIB, all Naval Reactors employees are DOE employees. The board shall consist of an AIB Chairperson and three to six members, at least one of whom (the Chairperson or a board member) is a DOE Accident Investigator as defined below. The Appointing Official or his/her representative shall brief the AIB Chairperson on the board's roles and responsibilities and other pertinent information within three calendar days of appointment.

b. Paragraph 4.c(1)(c) states that the AIB shall be appointed in writing and shall include the scope of the investigation, individuals being appointed, special provisions of the investigation, and a specified completion date for the final report. The Appointing Official may choose to appoint only the AIB Chairperson by name and authorize the AIB Chairperson to appoint the remainder of the AIB.

c. Paragraphs 4.c(1)(e) and 4.c(1)(f) discuss the qualifications of the AIB Chairperson and AIB members. The qualification of the AIB Chairperson and basis for participation of the AIB members should be derived from existing documentation and known qualifications at the time of appointment. The qualifications and basis for participation shall be briefly reviewed with the Appointing Official before the AIB is convened in writing. Any discrepancies between the make up of the AIB and the requirements of Paragraph 4.c shall be highlighted to the Appointing Official during this review. NR/08 Instruction R#3 contains listings of persons qualified to serve as AIB Chairpersons and AIB members.

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d. Paragraph 4.c(1)(g) provides for the use of supporting advisors and consultants to the AIB. Advisors and consultants should not be directly associated with the design of suspect items, or have other significant involvement with issues leading up to the event and may be either Naval Reactors or contractor personnel at the discretion of the AIB Chairperson.

4. Paragraphs 4.c(3)(c)4, 4.c(3)(g), 4.d(1), and 4.d(3) specify requirements for publishing and distributing final accident investigation reports and developing and disseminating lessons learned within the DOE. After the Appointing Official's acceptance of the accident investigation report, the investigation board should coordinate the publication of the report and the development of a lessons learned document and forward these reports to Naval Reactors Headquarters, who will make distribution within DOE as appropriate. A lessons learned document will be prepared using the template in NR/08 Instruction R#3.

5. Nothing in this NR DOE Directive IB shall relieve Program Sites of their responsibility to perform their own investigation and implement corrective actions in accordance with NAVSEA letter Ser 08S/05-01744 dated April 26, 2005, NAVSEA 389-0288 (Radiological Controls), NAVSEA S9213-33-MMA-000/(V) (Radiological Controls for Ships), LAB-RC-0288 (Radiological Controls Manual), NAVSEA S9213-55-MAN-000/(U) (Naval Reactors Safety Requirements Manual), NAVSEA 389-0152 (Water Chemistry Control), or other Naval Reactors requirement documents. In doing so, contractors should ensure that their efforts do not interfere with the accident investigation.

6. In Appendix B of the Order, the definition of a DOE Accident Investigator identifies that DOE Accident Investigators must attend an accident investigation course of instruction that is based on current materials developed by the Office of Health, Safety and Security. Naval Reactors Program personnel who have received DOE sponsored or equivalent training, participated in a formal Accident Investigation, or who by their senior management position routinely participate in formal investigations associated with fulfilling the requirements of NR/08 Instruction R#3 are considered to meet this requirement.

7. Limited scope accident investigations may be conducted for events where a formal but less resource-intensive accident investigation is warranted. Such events may, but do not always, meet the criteria established in Appendix A of the Order. The letter of appointment for these investigations will establish and specify the authority of the board, the scope of the investigation, and the time period for conducting the investigation. Generally, limited scope investigations will be conducted by a smaller board and completed during a shorter time period than full scope investigations specified by the Order. The results of the investigation should be documented in a report in accordance with NR/08 Instruction R#3. The board may include senior contractor personnel who have

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no known responsibility for the accident and who are not in the reporting chain of the senior manager for the site where the accident took place.

8. The DOE Office of Health, Safety, and Security maintains a number of guidance documents related to conducting accident investigations (e.g., DOE Accident Investigation Electronic Reference Tool and DOE-HDBK-1208-2012, Accident Investigation and Prevention). These references should be consulted during the preparation for and conduct of accident investigations, and practices contained in the guidance documents should be incorporated into the accident investigation where appropriate.

9. Requests for waivers and exceptions to specific requirements of this IB will be submitted to NR Headquarters for review and approval.

10. Oversight and evaluation of matters pertaining to accident investigations under the Director's cognizance will be conducted by NR Headquarters.

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