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DEFENSE NUCLEAR FACILITIES SAFETY BOARD

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April 29, 1994

The Honorable Victor H. Reis
Assistant Secretary for Defense Programs
Department of Energy
Washington, D.C. 20585

Dear Dr. Reis:

During a recent trip to the Pantex Plant, two Defense Nuclear Facilities Safety Board (Board) members were briefed on the events that led to securing operations and placing the Zone 12 facilities in a "Maintenance Mode," as well as the corrective actions planned prior to resumption of operations. The Mason & Hanger (M&H) and Amarillo Area Office management's decision to change from an operating mode to a maintenance mode was based on several occurrences that provided evidence that control of the safety envelope at Pantex was not adequate. The Board believes the decision to secure operations was prudent and demonstrates the Department of Energy's (DOE's) commitment to safety.

However, it was not clear from the briefings provided that all the issues that led to the mode change have been addressed in the proposed corrective action plan. In addition, the DOE Readiness Assessment plan committed to by DOE-Albuquerque has not been developed to define the scope of DOE actions required to ensure operational readiness prior to restart of the facilities.

Many of the issues that led up to the suspension of operations appear to be attributable to poor management of plant configuration and systems engineering. "Configuration Management," as described in the commercial nuclear industry as well as the new DOE Standard 1073-93, *Guide for Operational Configuration Management Program*, is an integrated management process that identifies and documents the physical and functional characteristics of a facility that are important to definition of the envelope. It also ensures that changes to these characteristics are properly developed, implemented, and incorporated in the facility's documentation.

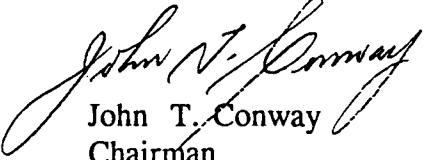
Mason & Hanger senior managers recognize that work needs to be done in this area. The recently approved Critical Safety System Manual is an important step in this process. However, little appears to have been done at Pantex to address the configuration management elements using a systems engineering approach. In addition, no interim measures appear to have been put in place to compensate for this deficiency prior to implementing the Pantex configuration management program. Without such an integrated approach, it is difficult to

see how Pantex will be able to prevent recurrence of the events that led up to the current action. It should be noted that accurate configuration management will also be essential to many of the programs that are currently undergoing major upgrades at Pantex, such as: Safety Analysis Reports, Training and Qualification, and Conduct of Operations.

The Board and its staff will be closely following your efforts to resume operations. In support of this effort, please provide your plan for addressing the issues that led to the maintenance mode and DOE's plans for assessing the M&H maintenance effort and the readiness to resume operations.

Mr. Steve Krahn of the Defense Nuclear Facilities Safety Board will be available to provide any additional information you may require. If you need any further information, please let me know.

Sincerely,



John T. Conway
Chairman

c: Mr. Mark Whitaker, Acting EH-6
Mr. Bruce Twining, Manager, Albuquerque Operations Office