



Department of Energy

Washington, DC 20585

11 August 1998

The Honorable John T. Conway
Chairman
Defense Nuclear Facilities Safety Board
625 Indiana Avenue, N.W.
Suite 700
Washington, D.C. 20004

Dear Mr. Chairman:

This is in response to your June 1, 1998, letter to the Assistant Secretary for Defense Programs requesting additional information on the process by which the Department of Energy (DOE) performs change control for its nuclear explosive operations (NEO) at the Pantex Plant.

A meeting was held June 10, 1998, with staff from DOE/Headquarters, Albuquerque Operations Office (AL), and the Board to address NEO change control. A primary conclusion reached at the meeting was that recent discussions concerning change control have been incorrectly characterized as faults with the Nuclear Explosive Safety Study (NESS) program. We agreed at the meeting the line organization (program office or area office) must do a better job of establishing the validity of a change. The line organization must identify potential changes, identify the associated safety impacts, reach a decision on overall merit of the proposed change, and prepare a safety case for those changes deemed beneficial.

To correct the weaknesses discussed in your letter, we must first rebuild the line organization's authority and accountability. The line organization will be accountable to establish a compelling case that a proposed change will improve the overall safety of the operations, or maintain the overall level of safety while allowing introduction of other improvements. In the case of NEO, the line organizations will be the Weapon Programs Division (WPD) of AL and the Amarillo Area Office (AAO). AL is committed to improving the change control process by moving the obligation to establish the safety case for a proposed change back to the line organization. The line organization will also ensure the technical merit of each safety case.

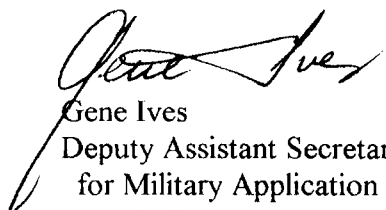
Rick Glass, as the Integrated Safety Process (ISP) Project Officer, will revise the ISP Project Plan to address this issue and will ensure we follow through on ISP commitments. The enhancements will ensure line management has a formal process to review proposed changes to Pantex NEO and any associated safety implications. This process must accomplish the objectives of the unresolved safety question process for safety basis changes. AL is preparing changes to the supplemental directives to address the line management process for development of the safety basis for a proposed change and the process to select the appropriate level of NESS review. We will arrange the requested Board briefing before these supplemental directives are issued.



A number of proposed changes to Pantex operations are under development, and many of these changes are safety improvements. Please recognize it will take some time to implement the improved change control processes in AAO and WPD, as discussed above. Given the time required to implement this process, it should be reasonable to expect incremental improvement with each successive change but not complete achievement of the objectives on every change.

If there are any questions or concerns regarding this issue, please contact me at 202-586-4879 or Richard Glass at 505-845-6045.

Sincerely,



Gene Ives
Deputy Assistant Secretary
for Military Application and
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