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DEFENSE NUCLEAR FACILITIES SAFETY BOARD

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January 6, 1999

The Honorable Bill Richardson
Secretary of Energy
1000 Independence Avenue, SW
Washington, DC 20585-0104

Dear Secretary Richardson:

The Defense Nuclear Facilities Safety Board (Board) has been following closely the Department of Energy's (DOE) efforts to implement Recommendation 93-1, *Standards Utilization in Defense Nuclear Facilities*, and the *Nuclear Explosive Safety Study Corrective Action Plan* (NESSCAP). One of the remaining issues that needs to be resolved before this recommendation is closed is the development and implementation of a Hazard Analysis Report (HAR) standard. This standard is critical to ensuring a comprehensive, defensible, and repeatable hazard analysis process for the selection and preservation of the operation-unique controls needed to define the authorization basis for nuclear explosive operations at Pantex and the Nevada Test Site.

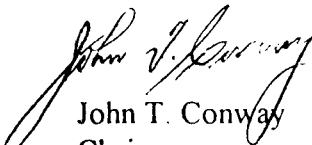
DOE has been struggling to publish a final version of this standard since the first draft was developed in July 1995. On December 5, 1997, the Board sent a letter to the Secretary of Energy that issued a reporting requirement for the completion of the HAR standard. In a July 31, 1998, letter from the Deputy Assistant Secretary for Military Application and Stockpile Management, DOE committed to final publication of DOE-DP-XXXX-98, *U.S. Department of Energy Hazard Analysis Reports for Nuclear Explosive Operations*, by the end of October 1998. Unfortunately, this latest draft was late and falls short of the goal of identifying acceptable standard techniques and methodologies that will yield repeatable, defensible analysis and appropriate selection and preservation of nuclear explosive safety controls. The Board recognizes the unique aspects of assuring the safety of nuclear explosives, but believes that at the level of hazard analysis techniques, consensus standard approaches used to analyze hazards in other applications are appropriate.

The Board's staff recently provided DOE with formal comments on the HAR standard. Incorporation of the staff's comments, which are few in number but of fundamental importance, ought to lead to an efficient and effective process of safety management for nuclear explosive operations consistent with Recommendations 95-2 and 98-2.

The Board learned that after 3 years of effort there were approximately 300 comments on the latest version of the HAR standard. Given DOE's progress in clarifying its expectations for the outputs and uses of a HAR, it would appear that DOE Headquarters has received all the advice and input necessary to issue its final policy directive on the format and content of a HAR, specification of acceptable standard analytical tools, and explanation of the relationship between the HAR and other safety basis documentation for nuclear explosive operations.

The Board looks forward to resolution of these issues and publishing of an approved HAR standard in the near term. The Board and its staff are available to assist DOE in whatever way is necessary to progress toward the achievement of the goals of Recommendation 93-1 and ultimately its closure.

Sincerely,



John T. Conway
Chairman

c: The Honorable Victor H. Reis
Mr. Mark B. Whitaker, Jr.