



## Department of Energy

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APR 28 2000

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

Dear Mr. Chairman:

Consistent with the Department's implementation plan (IP) for the Defense Nuclear Facilities Safety Board (DNFSB) Recommendation 98-2, the following provides an update on deliverables.

1. Deliverables 5.1.3 and 5.2.1, #2 – Issue TBP-901. Technical Business Practice (TBP)-901, *Integrated Safety Process for Nuclear Weapons Operations and Facilities*, Issue A, was formally issued through the Sandia National Laboratory system by IER20001033 on February 7, 2000 (enclosure #1). The Department has completed the actions associated with commitments 5.1.3 and 5.2.1.
2. Deliverable 5.1.4 – Project plans and schedules. The integrated weapons activity plan (IWAP), Issue F was approved by the Department on February 7, 2000. The IWAP includes resource-loaded schedules and project plans for each of the weapon systems. The Department requested Mason and Hanger Corporation (MHC) to provide a Pantex Safety Analysis Report Development and Implementation Plan by July 3, 2000 (enclosure #2). Until such time the plan is developed and integrated into the IWAP, the Department does not consider commitment 5.1.4 complete.
3. Deliverable 5.2.2 – Modify associated plant documents to meet the new TBP-901 standards. MHC provided an impact analysis of the new TBP and concluded no cost or programmatic impact (enclosure #3). MHC will submit an administrative change to the Management Integration and Control (MIC) Standards and Requirements Identification Document (S/RID) to reflect TBP-901 supercedes Interagency Engineering Procedure (EP) 401110, *Integrated Safety Process for Assembly and Disassembly of Nuclear Weapons*. This change will be processed in conjunction with other changes to the MIC S/RID that are required to close issues from the Pantex Plant Phase I integrated safety management system verification (ISMSV) review. Since TBP-901 is fully implemented by MHC, the Department has completed the actions associated with commitment 5.2.2.

4. Deliverable 5.2.3, #2 – Implement process improvements. Any remaining corrective actions stemming from the assessment of Pantex practices for tooling design, tooling procurement and procedure development are scheduled for completion by July 2000. The Department will provide an update on the remaining actions in the next status report.
5. Deliverable 5.3.1, #3 – Complete actions from the Authorization Basis (AB) task force. MHC completed development of the *Pantex Plant Integrated Safety Management Authorization Basis Manual* (MNL-254543), Revision 1, on February 21, 2000 (enclosure #4). The Department has additional comments requiring resolution, but considers the manual sufficient for initial use. The Department will provide an update on the remaining actions stemming from the AB task force in the next status report.
6. Deliverable 5.3.2, #3 – Combine requirements in one manual. The Department issued Albuquerque Operations Office (AL) Supplemental Directive 56XB, *Development and Production (D&P) Manual, Chapter 11.7, Nuclear Explosive Operations Change Control Process* in June 1999. Chapter 11.7 provides requirements and guidance on how the unreviewed safety question (USQ) and nuclear explosive safety change control processes are integrated. The Department provided a copy to the DNFSB by letter on June 30, 1999. Since D&P Manual Chapter 11.7 combined the requirements into a single document, the Department has completed the actions associated with commitment 5.3.2
7. Commitment 5.3.3 – Assess effectiveness of review process for proposed authorization basis documents. The Office of Oversight, Environment, Safety and Health (EH-2) is conducting an authorization basis evaluation specific to the Pantex Plant. The review is a follow-up evaluation by the Office of Environment, Safety and Health stemming from “opportunities for improvement” identified during an earlier review (*Independent Oversight Evaluation of Headquarters and Albuquerque Operations Office Management of Environment, Safety, And Health Programs at the Pantex Plant*, October 1996). In light of the extent and scope of the EH-2 evaluation, and the earlier assessment performed by the Office of Defense Programs in April 1999, the Department does not consider further evaluations of the authorization basis review process warranted. The Department will address this issue through the impending revision to the IP for Recommendation 98-2.
8. Deliverables: 5.4.2, #3; 5.4.3, #2; 5.5.1, #4; and, 5.5.2, #2 – Revise and issue DOE Order 452.2 and DOE-STD-3015. Department personnel are currently working with DNFSB staff to resolve remaining comments on both the order and the associated standard. The Department will address the schedule for completion of these deliverables through the impending revision to the IP for Recommendation 98-2.

9. Deliverable 5.6.1, #2 – ISMSV Phase I Review Report. The Department completed an ISMSV Phase I review of the Pantex Plant on April 13, 2000 (enclosure #5). The Department anticipates approval of the MHC ISM system description in early May, pending satisfactory closure of the issues identified as a prerequisite. This will complete all of the actions under commitment 5.6.1.
10. Commitment 5.6.2 – Develop a plan for and conduct an ISMSV Phase II Review. An ISMSV Phase II Review for Pantex Plant will be conducted prior to September 2000 per the Secretary's commitment. The review will be conducted after completion of the required Phase I Corrective Actions Plans and declaration of readiness by the contractor.
11. Deliverable 5.6.3, #1 – Critical Safety Systems Manual (CSSM) conversion to Technical Safety Requirements (TSR). On June 3, 1999, the Department transmitted a copy of the approved TSR to the DNFSB. The TSR were subsequently revised and the most recent version is included as enclosure #6. On March 13, 2000, MHC submitted a declaration of readiness to operate in accordance with the Master Authorization Agreement for the Pantex Plant. The declaration of readiness and change to the Master AA reflected implementation of the TSR (enclosure #7). The Department has completed the actions associated with deliverable 5.6.3, #1.
12. Deliverable 5.6.3, #2 – Approved Basis for Interim Operation (BIO) and TSR upgrade for lightning hazards. The Department approved the Lightning BIO on April 17, 2000 (enclosure #8). The TSR stemming from the Lightning BIO will be fully implemented by May 11, 2000. The Department has completed the actions associated with deliverable 5.6.3, #2.
13. Deliverable 5.6.3, #3 – Approved BIO and TSR upgrade for transportation hazards. The Department has increased the scope of the transportation module of BIO to include partial weapon configurations. As an interim compensatory measure, the Department incorporated administrative controls on nuclear material storage, handling, shipping, and ramp traffic in the TSR (sections 5.6.8 and 5.6.22). The revised date for completion of the transportation BIO and associated TSR is August 2000. The Department will address the schedule for completion of this deliverable through the impending revision to the IP for Recommendation 98-2.
14. Deliverable 5.6.4, #1 – Re-authorization of the existing W88 process in accordance with the tasks and schedule identified in the IWAP. MHC has resubmitted the W88 HAR and activity based control document (ABCD) for Department approval. The Department will address the schedule for completion of this deliverable through the impending revision to the IP for Recommendation 98-2.

15. Commitments 5.8.1 and 5.8.2 – Complete strength, weaknesses, opportunity, and threat analysis for project management skills. Prepare a long-term project management personnel plan. Strengthen skills and experience level of Pantex team leads. The majority of deliverables and actions under these commitments are complete. The Department will provide an update on the remaining actions in the next status report.
16. Commitment 5.8.4 – Staff authorization basis review positions at AAO and AL. Complete qualification of individuals with the authority to approve authorization basis documents. Qualification standards are established for all AL personnel involved in the review and approval of AB documents. The Department has increased the staff of the AAO to review AB documents. The personnel have achieved varying levels of qualification, dependent upon the amount of time in such positions. AL tracks qualification in accordance with the requirements of DOE Order 360.1. In light of these actions, the Department considers commitment 5.8.4 complete.

If you have any questions, please contact me at (505) 845-6050 or Karen Boardman at (505) 845-6045.



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Enclosures

cc w/enclosures:

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