John T. Conway, Chairman A.J. Eggenberger, Vice Chairman Joseph J. DiNunno John E. Mansfield

## DEFENSE NUCLEAR FACILITIES SAFETY BOARD



625 Indiana Avenue, NW, Suite 700, Washington, D.C. 20004-2901 (202) 694-7000

October 2, 2001

Ms. Kathleen A. Carlson Acting Deputy Administrator for Defense Programs Department of Energy 1000 Independence Avenue, SW Washington, D.C. 20585-0104

Dear Ms. Carlson:

The Defense Nuclear Facilities Safety Board (Board) has noticed numerous recent incidents involving inadequate procedural compliance at the Pantex Plant. The Department of Energy's (DOE) Occurrence Reporting and Processing System contains reports from more than 50 such incidents at Pantex since January 2001, including missed steps, steps performed out of sequence, violations of procedural requirements, use of wrong procedures, etc. Of particular concern is the fact that at least 10 of these incidents involved work directly on nuclear explosives.

On several occasions, the Board has identified the essential role that formal conduct of operations plays in ensuring the safety of nuclear explosive activities. DOE's significant reliance on administrative controls (as opposed to engineered controls) to implement many of the technical safety requirements at Pantex necessitates strict procedural compliance for all nuclear explosive operations there.

Accordingly, pursuant to 42 U.S.C. § 2286b(d), the Board requests that DOE provide a briefing within 30 days of receipt of this letter, providing details on the procedural compliance problem at Pantex, and what corrective actions DOE proposes.

Sincerely,

John T. Conwa

Chairman

c: Mr. Mark B. Whitaker, Jr. Mr. Richard E. Glass Mr. Daniel E. Glenn