

## **Department of Energy**

National Nuclear Security Administration

Washington, DC 20585

November 26, 2002

The Honorable John T. Conway Chairman Defense Nuclear Facilities Safety Board 625 Indiana Avenue, NW. Suite 700 Washington, D.C. 20004-2901

Dear Mr. Chairman:

This letter is provided in response to your letter of October 3, 2002, on the observations of Enriched Uranium Operations (EUO) Wet Chemistry resumption activities. Your letter noted continuing concerns with line management's inability to effectively achieve an adequate state of readiness prior to starting the readiness review process. The National Nuclear Security Administration (NNSA) concurs with the issues identified by your staff, and the Y-12 Site Office (YSO) has been closely following this activity and ensuring BWXT Y-12 addresses these and other issues with their restart process.

On October 14, 2002, the BWXT Y-12 Operational Readiness Review (ORR) team issued its final report that concluded that readiness preparations remain inadequate to allow a recommendation that startup can proceed safely. The ORR team cited three primary factors for this determination. They included the extensive use of simulations, inappropriate disposition of equipment testing exceptions, and the inability to satisfactorily correct problems identified by review teams. The YSO concurs with this conclusion and recognizes that the ORR process was credible. However, improvements are necessary in the restart preparation process.

BWXT Y-12 is evaluating the activities required to establish the necessary level of readiness for the restart of EUO Wet Chemistry operations. The path forward will include an evaluation by line management on the overall readiness of the operation, a BWXT Y-12 ORR, a YSO validation of readiness review by BWXT Y-12, and the NNSA ORR. The schedule for the readiness review phase is still under review and will be provided to your staff as soon as the schedule has been finalized.

BWXT Y-12 is also evaluating the causal factors associated with inadequate preparations resulting in the negative conclusion reached by the contractor ORR. It is anticipated that lessons learned will be generated that will require revisions to the Y-12 Plant procedures. While improvements have been made to the Y-12 readiness process as demonstrated in the successful restart/start-up of a number of operations in the past year, it is recognized that further action is necessary to consistently implement and improve the overall readiness process at Y-12.



I appreciate your staff's involvement in the Y-12 readiness process and the feedback provided in your letter. The NNSA will schedule a briefing to the Board prior to commencing the NNSA ORR for EUO Wet Chemistry to discuss specific actions that have been taken, as well as results of the contractor reviews. Additionally, any long-term corrective actions will be discussed with you at that time.

If you have any questions concerning our approach for improving the readiness process at Y-12, please contact me or have your staff contact Mr. David E. Beck at 202-586-4879, or Mr. Bill Brumley at 865-576-0752.

Sincerely,

Jn P. Inde

Everet H. Beckner Deputy Administrator for Defense Programs

cc: M. Whitaker, EH-9