The Honorable A. J. Eggenberger  
Chairman  
Defense Nuclear Facilities Safety Board  
625 Indiana Avenue, NW, Suite 700  
Washington, D.C. 20004-2941  

Dear Mr. Chairman:

The purpose of this letter is to transmit the National Nuclear Security Administration Central Technical Authority (CTA) implementing guidance regarding expectations that the safety bases and controls be finalized and approved before a Contractor Readiness Assessment begins. I will be transmitting this guidance to the Site Office Managers in my role as Line Management Authority for the site offices.

I mentioned this CTA guidance in my August 14, 2007, letter to you as a pending action.

If you have any comments or feedback, please call me or Mr. Steve Goodrum, Assistant Deputy Administrator for Military Application and Stockpile Operations at (202) 586-4879.

Sincerely,

Martin J. Schoenbauer  
Principal Assistant Deputy Administrator for Operations  
Defense Programs

Enclosure
MEMORANDUM FOR MARTIN J. SCHOENBAUER
PRINCIPAL ASSISTANT DEPUTY ADMINISTRATOR
FOR OPERATIONS

FROM: WILLIAM C. OSTENDORFF
CENTRAL TECHNICAL AUTHORITY (CTA)

SUBJECT: STARTUP AND RESTART OF NUCLEAR FACILITIES

The safe startup and restart of nuclear facilities is ensured by a rigorous process set forth in Department of Energy (DOE) Order 425.1C, Startup and Restart of Nuclear Facilities, and DOE Standard (STD) 3006-2000, Planning and Conduct of Operational Readiness Reviews. During the last 18 months, several instances have occurred in which DOE requirements and best practices for startup activities may have been circumvented. I am issuing this memorandum to establish clear expectations in two key areas and to direct actions to institutionalize these expectations through the directives process.

The first area involves facility safety documentation. DOE O 425.1C establishes a set of Minimum Core Requirements (MCRs) for readiness. The seventh MCR requires safety documentation to be in place and implemented that describes the safety envelope of the facility being started or restarted. It is an NNSA expectation that this MCR applies to all readiness assessments and reviews. Facility safety documentation that addresses an activity being started or restarted must be approved and implemented prior to beginning the contractor readiness assessment or readiness review for that activity. When facility safety documentation requires NNSA approval, that approval must be obtained before the start of the contractor’s readiness assessment or review.

The second area involves startup notification reports (SNRs). DOE O 425.1C establishes SNRs as the vehicles by which agreement on types of review and authorization authority is documented, and by which senior management is kept informed. The Order requires periodic submission of SNRs and recommends a quarterly submission period. Effective October 15, 2007, it is an NNSA expectation that SNRs be submitted quarterly and that copies be submitted to NA-10 and to the Chief of Defense Nuclear Safety (CDNS). Quarterly SNRs must include summary-level information on all scheduled activities that may require readiness reviews and that are projected to occur within the subsequent 12 months. More detailed information, as described in DOE O 425.1C and DOE-STD-3006-2000, must be included for activities that have not been included on
previous SNRs. Proposed startups or restarts that arise between quarterly SNR submittals (e.g., for short notice activities or unplanned shutdowns) may be approved as amendments to the previous quarterly SNR.

I request that you formalize these expectations for all Hazard Category 1, 2, and 3 nuclear activities and operations under your authority. I also request that you advise the Defense Nuclear Facilities Safety Board that the commitment in your memorandum of August 14, 2007, for the CTA to issue guidance on this subject, has been met. Finally, as CTA, I am initiating an action through the CDNS, to ensure that these expectations are institutionalized through the directives process.

c: Thomas D’Agostino, NA-1
    James McConnell, NA-2.1
    Richard Crowe, NA-2.1
    Michael Thompson, NA-17
    Carl Sykes, NA-17
    Manager, Sandia Site Office
    Manager, Pantex Site Office
    Manager, Livermore Site Office
    Manager, Nevada Site Office
    Manager, Y-12 Site Office
    Manager, Savannah River Site Office
    Manager, Los Alamos Site Office