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DEFENSE NUCLEAR FACILITIES SAFETY BOARD

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January 13, 2009

The Honorable Thomas P. D'Agostino
Administrator
National Nuclear Security Administration
1000 Independence Avenue, SW
Washington, DC 20585-0701

Dear Mr. D'Agostino:

In the revised Implementation Plan for the Defense Nuclear Facilities Safety Board's (Board) Recommendation 2004-2, *Active Confinement Systems*, the Department of Energy (DOE) committed to delivering the Ventilation System Evaluation Report for the Plutonium Facility at Los Alamos National Laboratory (LANL) to the Board by December 21, 2006. The Board has not yet received this report. The evaluation of the Plutonium Facility was intended to address a "high-priority facility" on an accelerated schedule, and to include an assessment of the facility's needs and a plan for resolving identified gaps with appropriate upgrades.

The Board recognizes the challenges faced by the laboratory in attempting to complete this evaluation while also developing a safety basis for the Plutonium Facility in compliance with Title 10 of the Code of Federal Regulations Part 830, *Nuclear Safety Management*. The Board also recognizes that a portion of the delay in completing the Ventilation System Evaluation Report was attributable to the laboratory's initiative to perform an independent review of proposed upgrades to the safety basis of the Plutonium Facility in the context of improving the facility's performance in preventing or mitigating design basis accidents. This independent review resulted in a set of recommended actions described in a memorandum to the Los Alamos Site Office (LASO) dated June 26, 2008. The recommended actions would strengthen the Plutonium Facility's confinement strategy and improve its overall safety posture by transitioning to safety-class active confinement ventilation within the next 3 to 5 years. LASO endorsed these recommended actions as the Ventilation System Evaluation Report and forwarded them to the National Nuclear Security Administration's Deputy Administrator for Defense Programs for concurrence in a letter dated September 17, 2008.

As DOE finalizes this deliverable, the Board wishes to emphasize that the implementation of the recommended actions demands careful integration and planning to ensure successful execution. The laboratory currently envisions implementing the recommended

actions through an Integrated Priority List (IPL) process. In practice, however, the Board has observed that the IPL process is used at LANL to manage limited resources and schedule a broad range of activities from equipment upgrades to facility maintenance activities. In the Board's view, the IPL process alone does not ensure that DOE's best project management practices (as outlined in DOE Order 413.3A, *Program and Project Management for the Acquisition of Capital Assets*) are adequately applied to ensure successful and timely execution of the project. The Board notes that LASO, in its recent approval of the safety basis for the Plutonium Facility, directed the contractor to develop an integrated project management plan to implement the improvements discussed in the safety basis—this represents an opportunity to apply DOE's best management practices. Therefore, the Board requests that, within 90 days of receipt of this letter, DOE submit the following deliverables as described in the Implementation Plan for Recommendation 2004-2:

- 8.6.3: A site office facility-specific Ventilation System Evaluation Report for the Plutonium Facility at LANL (originally due December 21, 2006)
- 8.6.5: Program Secretarial Office concurrence with and approval of the upgrades in coordination with the Central Technical Authority (originally due March 20, 2007)

Additionally, pursuant to 42 U.S.C. § 2286b(d), the Board requests that DOE provide a report summarizing physical modifications and upgrades for the Plutonium Facility, including plans for funding and a schedule for completion, to be submitted along with the above two deliverables. This report should include the approach DOE will take to ensure that the best project management practices are applied in implementing the upgrades. It should also include a technical justification if any of the enhancements recommended in LASO's September 17, 2008, letter will not be implemented in the near future.

Sincerely,



A. J. Eggenberger
Chairman

c: Mr. Glenn S. Podonsky
Mr. Donald L. Winchell
Mr. Mark B. Whitaker, Jr.