



Department of Energy

Washington, DC 20585

February 28, 1994

Mr. John T. Conway
Chairman
Defense Nuclear Facilities Safety Board
625 Indiana Avenue, N.W., Suite 700
Washington, D.C. 20004

Dear Mr. Conway:

The enclosed deliverables are provided in accordance with the Recommendation 93-1 Implementation Plan to assess the scope and effectiveness of the Department's Orders and supplementary directives covering nuclear explosive assembly, disassembly, and test operations at the Pantex Plant and the Nevada Test Site (NTS).

Enclosed are the Critical Safety Element (CSE) definitions (Enclosure 1) developed during IP Action 2 which will be used to evaluate DOE Orders and supplementary directives under IP Action 3. They provide a yardstick to assess the safety of nuclear explosive operations and were developed through interactions between DOE Headquarters elements, the Albuquerque, Nevada, and Oakland Operations Offices; the weapons laboratories; and the Pantex and NTS M&O contractors. In many situations, personnel responsible for developing the Departmental orders and directives, as well as site personnel charged with their compliance, participated in this process.

The CSE report describes 36 topical areas organized into six major groupings.

- Plant & Hardware
- Operations and Procedures
- People
- Management Systems
- Safety Programs
- Environment, Safety, and Health

The first 28 items correspond to information contained in NRC/NUREG-1324, "Proposed Method for Regulating Major Materials Licensees" with some modifications to reflect nuclear explosive facility operations. An additional 8 CSEs were developed for operations which involve the handling, assembly, disassembly of nuclear explosives.

These CSEs have been used during a preliminary screening of the DOE Orders and directives of interest to the Board, and a matrix displaying the individual CSE and order/directive attributes are shown in the matrices at Enclosure 2. Separate matrices are provided for the Pantex Plant and the Nevada Test Site, due to the numbers and scope of supplementary directives which apply to each location. The procedures used to develop these matrices are discussed in Enclosure 3.



The CSEs are pointers to evaluate specific sections in the Orders and directives during the Action 3 detailed evaluation. The procedure for this evaluation is provided in Enclosure 4. The Orders and directives of interest have been reviewed to bin those sections relevant to assure CSEs. Action 3 step will review the individual documents to determine if they sufficiently cover the CSE topic.

DOE Orders, that do not provide an appropriate level of policy guidance or adequate standards will be identified. The reviewers will document their Action 3 assessments as guidance for the Action 4 corrective action plan.

If further information is needed regarding this report, please contact Captain David Olson at 301-903-3463.

Sincerely,

A handwritten signature in black ink, appearing to read "Charles J. Beers, Jr.", with a small "for" written below the signature.

Charles J. Beers, Jr
Rear Admiral, U.S. Navy
Deputy Assistant Secretary
for Military Application and
Stockpile Support
Defense Programs

4 Enclosures