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DEFENSE NUCLEAR FACILITIES SAFETY BOARD

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December 5, 1997

The Honorable Federico F. Peña
Secretary of Energy
1000 Independence Avenue, SW
Washington, D.C. 20585-1000

Dear Secretary Peña:

During the past few years, the Defense Nuclear Facilities Safety Board (Board) and the Department of Energy (DOE) have worked to improve the DOE Orders related to the safety of nuclear explosive operations. DOE's actions to implement Recommendation 93-1, *Standards Utilization in Defense Nuclear Facilities*, and the *Nuclear Explosive Safety Study Corrective Action Plan* (NESSCAP) have yielded the 452-Series Orders, standards, and guide, which represent a significant improvement in the process for achieving safety in nuclear explosive operations.

The Board's Recommendation 93-1 called for the analyses and standard development necessary to implement a standards-based safety management program for nuclear explosive operations. During the time that DOE and the Board have been working to implement Recommendation 93-1, some fundamental changes have occurred in DOE's approach to developing and implementing standards, as reflected in DOE's implementation of the Board's Recommendation 95-2, *Safety Management*. While these changes may have impacted the explicit actions in DOE's implementation of 93-1, the fundamental intent—implementation of improved directives—remains and is still not completely addressed.

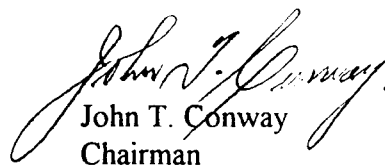
From the various issues raised in Board correspondence concerning W69 dismantlement and other recent Pantex activities, it is clear that implementation of the 452-Series Orders (which are pivotal to the standards-based safety management program for nuclear explosive operations) is not proceeding as anticipated. Additionally, there has been little progress in developing and implementing the hazard analysis report (HAR) standard referenced in the Orders since the Board's April 1996 letter, which urged implementation of all the 452-Series directives. Although the Board welcomes DOE's continuing actions to develop an integrated safety process for nuclear explosive operations, that process will need to incorporate the many improvements embodied in the 452-Series directives.

Consequently, the Board requests a report that addresses DOE's path forward and schedule for completing the remaining objectives of Recommendation 93-1 and the NESSCAP. This report should include the following specific items:

- The plans of the Albuquerque and Nevada Operations Offices for implementing the 452-Series Orders and their associated standards and guides.
- The continuing and/or additional actions and resources (e.g., funds and personnel) that will be needed for the Deputy Assistant Secretary of Military Application and Stockpile Management (DP-20) to carry out his responsibilities as required by the new directives.
- The status of the draft HAR standard referenced in the 452-Series Orders and the schedule for its final publication and full implementation.

The Board requests that this report be issued no later than 60 days from the date of this letter. The Board's staff is available to work closely with your staff on developing and executing the final plans necessary prior to closure of Recommendation 93-1.

Sincerely,



John T. Conway
Chairman

c: The Honorable Victor H. Reis
Mr. Mark B. Whitaker, Jr.