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DEFENSE NUCLEAR FACILITIES SAFETY BOARD

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June 11, 1999

The Honorable Victor H. Reis
Assistant Secretary for Defense Programs
Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585-0104

Dear Dr. Reis:

The Defense Nuclear Facilities Safety Board (Board) has recently forwarded to you several reports describing observations of readiness reviews conducted at the Pantex Plant. These reports have highlighted several areas in which the processes used at Pantex were inconsistent with the requirements and good practices expressed in Department of Energy (DOE) Order 425.1A, *Startup and Restart of Nuclear Facilities*, and with the principles of Integrated Safety Management (ISM). Based on the planned DOE readiness review of the AL-R8 Sealed Insert container process, two crucial concepts require additional emphasis.

The first of these concepts is that DOE should have its contractor's declaration of "readiness to proceed" prior to its own determination of readiness. This declaration ensures that contractor line management fully realizes and accepts unilateral responsibility for safety of the work it is contracted to perform—a fundamental principle of ISM. Further, if DOE's readiness assessment is not independent of the contractor's efforts to evaluate readiness to operate safely, it is not possible for DOE to hold its contractor accountable for making a correct determination.

The second concept is that DOE should tailor its readiness assessment within the framework of the existing DOE directives. The DOE directives on readiness reviews allow appropriate tailoring, but use of undefined processes such as "readiness evaluations" and "shadow teams" detract from the ISM principle of clear roles and responsibilities and the intent of the readiness review process.

The Board believes there is adequate guidance on the requirements for readiness reviews at Pantex in the form of DOE Headquarters Directives and Albuquerque Operations Office (DOE-AL) Supplemental Directives. However, DOE-AL has several outdated and conflicting directives at both the operations office and area office level that should be reconciled and brought into

consonance with the Headquarters-level directives. The Board believes DOE needs to improve its planning and conduct of readiness reviews at Pantex consistent with the latitude allowed under the existing DOE directives.

The Board wishes to be informed of the disposition made of these observations. If you have questions, please call me.

Sincerely,

by *AND FOR*
John T. Conway
Chairman

- c: Mr. Gene Ives
- Mr. Richard E. Glass
- Mr. Mark B. Whitaker, Jr.