



Department of Energy
National Nuclear Security Administration
Washington, DC 20585

February 3, 2004

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

Dear Mr. Chairman:

Commitment 4.6 of the Department's Implementation Plan (IP) for Defense Nuclear Facilities Safety Board (Board) Recommendation 2002-3 is to review field implementation of existing critical administrative controls to ensure they are developed, implemented, and maintained in accordance with the Department of Energy (DOE) expectations. The enclosed schedules for reviews at all the National Nuclear Security Administration (NNSA) sites except Los Alamos National Laboratory (LANL) are provided as deliverable 4.6.1 of the Implementation Plan. If we cannot provide the LANL schedule to you by February 27, 2004, we will advise you of the timeline for its submission. The complete site submissions, including the supporting data sheets where available, have been provided to the Board's staff.

The Pantex Site Office is coordinating its 2002-3 reviews with the implementation of its site-wide safety analysis report. We believe this approach will produce a fully implemented, rule compliant safety basis sooner than the alternative of delaying the site-wide effort to allow shifting of resources to conduct the 2002-3 reviews by an earlier date. This coordinated review approach will result in a delay in Pantex information for the final report of June 2005 as described in deliverable 4.6.2. Pantex Site Office personnel are keeping the Board's site representative at Pantex informed of progress in completing the review.

Some NNSA sites have already completed reviews of implementation of administrative controls. The new draft DOE standard on specific administrative controls, which is undergoing DOE-wide review, may contain additional guidance on specific administrative controls. NNSA sites plan to review their schedules after the new standard is approved and make appropriate adjustments. It is anticipated that some sites may have to conduct follow-up reviews based on new guidance in the standard. If the standard is not approved in a timely manner, or if the standard creates significant new requirements, the reviews at some sites are expected to take longer than the time allowed in the Department's IP for this recommendation. Site Managers have change control authority over all portions of the data packages and schedules, subject to the external constraints of satisfying the timelines and guidance of my November 25, 2003, direction (enclosed).

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If you have any questions about this submission or about our path forward on this or other NNSA obligations under the IP, please contact me or have your staff contact Jeff Underwood at (301) 903-8303.

Sincerely,



Everet H. Beckner
Deputy Administrator
for Defense Programs

Enclosures



cc w/enclosures:
M. Whitaker, DR-1