A.J. Eggenberger, Chairman John E. Mansfield Joseph F. Bader Larry W. Brown Peter S. Winokur

DEFENSE NUCLEAR FACILITIES SAFETY BOARD

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December 15, 2006

Mr. Thomas P. D'Agostino
Deputy Administrator for Defense Programs
National Nuclear Security Administration
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585-0104

Dear Mr. D'Agostino:

For the past several years, the Defense Nuclear Facilities Safety Board (Board) has expressed its concern regarding the quality and consistency of the process by which the design agencies develop and provide information on weapon response to the Pantex Plant. In the Implementation Plan (IP) for the Board's Recommendation 98-2, Safety Management at the Pantex Plant, the Department of Energy (DOE) committed to standardizing the weapon response development process. Commitment 4.2.2 of the IP specifically addressed the need to promulgate further guidance on expectations for the evaluation and documentation of weapon response to potential accident environments and stimuli. This guidance has taken various forms in the years since the IP was revised, and the revised guidance has now been incorporated into the latest revision of DOE Standard 3016, Hazard Analysis Reports for Nuclear Explosive Operations.

The Board has been briefed that the latest revision of DOE Standard 3016 constitutes publication of "further guidance" addressed by Commitment 4.2.2. However, the Board is not able to judge the acceptability of DOE Standard 3016 because the design agencies have yet to implement the guidance provided for expert elicitation, expert judgment, and peer review. Therefore, the Board requests that the National Nuclear Security Administration (NNSA) provide a completion date for the Final Assessment Report (DOE Commitment 4.5.1 to "complete a comprehensive assessment of the actions taken in response to Recommendation 98-2"), and in it address plans and criteria for NNSA review and approval of these critical processes as part of the design agencies' quality assurance requirements in accordance with Title 10, Code of Federal Regulations, Part 830, Subpart A.

Sincerely,

A. J. Eggenberger

Chairman