MEMORANDUM FOR: J. K. Fortenberry, Technical Director **FROM:** W. White, Pantex Site Representative

SUBJECT: Pantex Plant Activity Report for Week Ending January 9, 2004

<u>**DNFSB Activity Summary:**</u> W. White was on site all week. M. Duncan and R. West were on site Tuesday through Friday to review the NNSA readiness assessment of the seamless safety tooling for the W78 program.

W78 Seamless Safety Process: After concluding its contractor readiness assessment (CRA) of the new W78 seamless safety process last week, BWXT closed the findings associated with the CRA this week. The General Manager signed a declaration of readiness on Thursday, and the NNSA readiness assessment began the same day.

Of particular interest, several of the pre-start findings from the CRA related to completion or flow-down of the authorization basis for W78 operations. The W78 CRA had started without NNSA approval of the final authorization basis changes. This was a known pre-start for the CRA. During the assessment, the CRA found 15 specific instances where authorization basis controls were not flowed down adequately. In addition, the CRA found that the final W78 HAR had not been published and that the applicability matrix for the TSRs had not been updated. The CRA noted the difficulty of integrating the W78 safety basis with the site-wide safety basis that is being implemented concurrently and in phases. Given the complexity of the safety basis and the fact that the safety basis was still somewhat in flux as the CRA began, the number of findings is not surprising. The CRA assessment of authorization basis flow-down for this review, however, was well documented and, on the surface, appeared very thorough.

The findings related to authorization basis flow-down and other issues resulted in a number of changes to the W78 operating procedures. These changes were evaluated through BWXT's formal change control process on an individual basis or in small groups. No end-to-end walk down of the procedures occurred to validate the changes made prior to starting the NNSA readiness assessment.

Also of concern, two CRA findings noted W78 tools that had been assembled incorrectly and issued to the line. These findings are similar to an occurrence last year involving an incorrectly assembled tool used for W56 operations. In this case, production technicians identified the tooling problems prior to use of the tools. However, it appears that some of the actions taken following the W56 occurrence were not entirely effective. BWXT will feed these findings back into the ongoing initiatives to improve the tooling program. [I, W4, W5]

Material Movement Violations: BWXT identified another violation of the material movement program on Thursday. In this case, BWXT personnel identified a part that was labeled as a radioactive component stored in the bottom of a basket of components that were clean. The entire basket of components appears to have been moved on one or more occasions without following procedures required for the movement of radioactive material. BWXT could not identify how the radioactive component became mixed with the clean components. The occurrence appears related to the ongoing effort to relocate certain operations in 12-86 to accommodate the new Special Nuclear Material Component Requalification Facility. As part of this effort, an unusually large number of moves are being made involving both clean and radioactive components located in 12-86. [I, P3A, P3B, P3C]