**DEFENSE NUCLEAR FACILITIES SAFETY BOARD**

**MEMO TO:** J. Kent Fortenberry, Technical Director
**FROM:** Timothy Hunt and Dave Kupferer, Pantex Site Representatives
**DATE:** 22 September 2006
**SUBJECT:** Pantex Plant Weekly Report

**W88 10 CFR 830 (Rule) Exemption Approval:** Last week, the Deputy Administrator for Defense Programs approved a temporary exemption from the requirements of 10 CFR 830, Part 830, Subpart B, Paragraph 830.207(a) for a limited number of W88 disassembly and inspection (D&I) and rebuild operations. The exemption alleviates BWXT from having to develop and submit a rule-compliant Documented Safety Analysis to PXSO prior to performing D&I and rebuild operations on three units. The exemption approval was based on an urgent need to obtain additional nuclear system data and NNSA requirements to rebuild and return the D&I units to the Department of Defense. The exemption requires PXSO to generate a new or revised Safety Evaluation Report (SER) that documents the continued validity of the existing SER.

**Multi-unit Operations (MUO)**: BWXT has issued a schedule for performing hazards analyses and developing associated controls to facilitate authorization and implementation of MUO in nuclear explosive bays. BWXT expects to submit the documentation necessary to authorize MUO for the W62, W78, W76, B83, W88, W80, and W84 programs during the next few years.

**Welding Program:** The Energy Facility Contractor Group (EFCOG) Quality Engineering Task Team recent reemphasized to the DOE contractor community the importance of effectively implementing a weld quality program. BWXT has been slowly making strides to improve its welding program since Bechtel Constructions Operations, Inc. (BCOI) performed a January 2005 assessment that identified several deficiencies including the following: identification of applicable inspection and testing requirements, development of procedures, control of filler material, and documentation of welding activities and welder qualifications. BWXT issued a Welding Program Improvement Project Plan early last year to address the aforementioned deficiencies. In September 2005, BWXT performed an internal assessment to validate the new procedures and identified a gap in the accuracy and completeness of the specified functional performance criteria for prescribed welds. BWXT is still working to identify the population of critical welds performed prior to implementing improvements to the welding program. However, the general belief is that very few vital safety systems have welded joints performed by BWXT and that the large majority of the welding on new special tooling was performed by outside vendors. One significant improvement made earlier this year was adding a welding subject matter expert to BWXT's maintenance division.

**Lockout/Tagout (LO/TO):** Last Thursday evening, maintenance personnel identified a potentially damaged mechanical mechanism of a roll-up door and had concerns that the door could fall if opened. In conjunction with his supervisor and the BWXT facility representative, the individual applied a LO/TO to the door's electrical switch to prevent it from being opened. The next morning, the individual who applied the LO/TO noticed that the LO/TO device was no longer installed and the door had been opened. Several opportunities were missed to avoid violating LO/TO principles.