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DEFENSE NUCLEAR FACILITIES SAFETY BOARD

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December 31, 1997

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

Dear Dr. Reis:

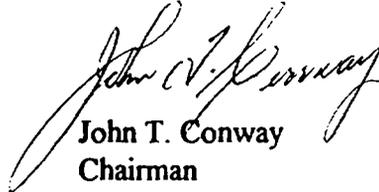
The staff of the Defense Nuclear Facilities Safety Board (Board) observed the first Nuclear Explosive Safety Evaluation (NESE) at the Pantex Plant on December 9-10, 1997. This evaluation reviewed the proposed use of two electrical testers (one of which was new) for the B83 Surveillance Program. The Board understands that the NESE process was developed to augment the Unreviewed Safety Question process for change control of nuclear explosive operations, as required in Department of Energy (DOE) Order 452.2A, *Safety of Nuclear Explosive Operations*. The Board commends such precautionary measures. However, in using this NESE process, the Albuquerque Operations Office has created a new type of nuclear explosive safety study group evaluation that is inconsistent with both DOE Order 452.2A and DOE Standard 3015-1997, *Nuclear Explosive Safety Study Process*.

It has also come to the Board's attention that Revision C to EP 401110, *Integrated Safety Process for Assembly and Disassembly of Nuclear Weapons*, was issued on September 18, 1997, without the Board's having an opportunity to comment on the proposed revision. Prior comments on EP 401110 from our March 14, 1997, and September 16, 1997, letters were not incorporated in this revision. These Engineering Procedures, along with the Operations Office supplemental directives, are an integral part of the system of directives and guides for nuclear explosive safety put in place to implement the Board's Recommendation 93-1, *Standards Utilization in Defense Nuclear Facilities*.

The processes used to revise EP 401110 and to develop and implement the NESE process are inconsistent with the standing agreement between the Board and DOE that allows the Board to review and comment on all proposed revisions to safety directives and guides. Therefore, the Board requests a timely briefing on the Defense Programs' vision for the nuclear explosive safety

(NES) Program, the role of the Deputy Assistant Secretary for Military Application and Stockpile Management in the NES approval cycle, and the status of nuclear explosive operations directives. It is also requested that this briefing occur prior to any further exercise of an NESE or changes to the NES directive system.

Sincerely,



John T. Conway
Chairman

c: Mr. Edwin G. Ives
Mr. Bruce Twining
Mr. Mark B. Whitaker, Jr.