



**Department of Energy
National Nuclear Security Administration
Production Office**



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January 16, 2024

The Honorable Joyce L. Connery
Chair, Defense Nuclear Facilities Safety Board
625 Indiana Avenue NW, Suite 700
Washington, D.C. 20004

Dear Chair Connery:

The Department of Energy (DOE) and National Nuclear Security Administration (NNSA) completed all actions identified in our Implementation Plan (IP) for Defense Nuclear Facilities Safety Board (DNFSB) Recommendation 2019-1, *Uncontrolled Hazard Scenarios and 10 CFR 830 Implementation at the Pantex Plant*. Execution of the IP resulted in numerous improvements to processes related to developing, maintaining, and implementing safety basis documents at the Pantex Plant (Pantex). These improvements include the following:

- Developing and implementing Specific Administrative Controls to prevent 'Falling Technician' scenarios;
- Augmenting requirements associated with Special Tooling, such as (a) requiring explicit identification of testing and inspection criteria and documentation of testing and inspection results and (b) requiring verification of weld quality for all load-path welds in credited Special Tooling;
- Dispositioning all 6 'legacy' Conditions of Approvals;
- Confirming that safety basis controls had been identified for all plausible hazard scenarios;
- Reducing the number of active Justifications for Continued Operations from a high of 15 to less than 5; and
- Incorporating courses taught by DOE's National Training Center into the qualification requirements for Safety Basis Analysts.

While completion of the IP demonstrates DOE's commitment to address the concerns raised by the DNFSB, DOE/NNSA will continue to identify and execute initiatives to further improve the Pantex Safety Basis. These initiatives include the Pantex Safety Basis Redesign effort and modernizing the remainder of the safety basis controls at Pantex. As discussed in our IP, we will also be performing an effectiveness review of all actions taken during execution of the IP.

Over the extended time and focus to improve the Pantex Safety Basis, the NNSA Production Office had frequent status discussions with DNFSB in addition to regular periodic briefings to the Board. The discussions have proved to be very constructive and served to highlight additional areas for improvement. DOE looks forward to continued collaboration with DNFSB with our shared goal of improving the safety posture of our nation's defense nuclear facilities.

If you have any questions, please contact me as the Responsible Manager for this recommendation at (865) 576-0841.

Sincerely,

Teresa M.
(6TR) Robbins

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