DEFENSE NUCLEAR FACILITIES SAFETY BOARD

August 31, 2001

MEMORANDUM FOR: J. K. Fortenberry, Technical Director

FROM: H. Waugh and W. White, Pantex Site Representatives

SUBJECT: Pantex Plant Activity Report for Week Ending August 31, 2001

<u>DNFSB Activity Summary:</u> H. Waugh was on leave Thursday and was on site for the remainder of the week. W. White was on leave Monday and was on site for the remainder of the week.

<u>Pit Repackaging Program:</u> For the month of August, BWXT repackaged more than 240 pits into sealed-insert containers. This is the fifth consecutive month in which more than 200 pits were repackaged for the month. This also marks the sixth consecutive record month for pit repackaging. Although the initial achievement of this repackaging rate took place over a year after DOE's original commitment to the Board (in the Implementation Plan for Recommendation 99-1), BWXT appears committed to sustaining a repackaging rate of at least 200 pits per month. If BWXT continues to repackage at this rate, they will earn the maximum incentive fee from NNSA for pit repackaging in FY01 [II.A]

Paint Bay Basis for Interim Operations: At the request of AAO, BWXT submitted an explanation this week for its proposed path forward for the paint bay and computed tomography facility. In the August 29, 2001, letter, BWXT proposes starting up these new, nuclear explosive facilities under a basis for interim operations (BIO). As justification, BWXT noted that the newer paint bay provides a safer environment for performing nuclear work than the old facility. The letter does not, however, explicitly acknowledge that painting operations on nuclear explosives have not been authorized in the older facility for several years and that computed tomography operations have never been authorized for nuclear explosives. The letter notes a new mission need for painting nuclear explosives in FY02, but does not discuss what, if any, impact would result from postponing this work until a safety analysis report (SAR) can be completed for the facility (currently scheduled for August 2002). The letter claims converting the BIOs to SARs would have an adverse impact on the IWAP schedule but fails to note that such a conversion is already planned in FY02 for the Paint Bay.

Interestingly, BWXT states in the letter that conversion from a BIO to a SAR "is an editorial task and would not result in any contribution to safety." This is despite the fact that the BIO modules as submitted identify several items that will be completed in the SAR upgrade process, many of which would contribute to safety. These items include a seismic analysis of the facility, identification of non-flammable paint substitutes, implementation of explosive transport carts, analysis of the tooling control program, and an analysis for the pressure rating or ductility of the tubing in the paint booth.

Also of interest, implementing the BIO modules will not provide authorization for nuclear explosive operations. The BIO modules as written require weapons response analysis from the design agencies and implementation of controls in the Fire BIO. Given the schedule already in place for the SAR upgrade and the need to complete weapon response analysis and to implement Fire BIO controls prior to starting nuclear explosive operations, it is unclear what is gained from starting new, nuclear explosive facilities under a BIO. This is especially true given the significant concerns raised by both AAO and the Board's staff with the BIO modules as currently written. [II.A]