

[DOE LETTERHEAD]

February 27, 1998

The Honorable John T. Conway
Chairman
Defense Nuclear Facilities Safety Board
625 Indiana Avenue, NW.
Suite 700
Washington, D.C. 20004

Dear Mr. Chairman:

On August 8, 1997, the Defense Nuclear Facilities Safety Board (DNFSB) requested a report on evaluating whether relative hazards of operations and relative capabilities of facilities are factored into decisions on facility use. Further, the DNFSB requested that this report address the question of whether it is feasible and advantageous to move the W69 operations to another facility in the near future. Your February 9, 1998, letter extended our response due date to February 27, 1998, and reemphasized some key issues related to the requested report, including how the improved facility selection process will be incorporated into the Integrated Safety Process (ISP).

In order to respond to your request, I tasked the Amarillo Area Office (AAO) to undertake a review and evaluation focusing on the specific issues raised in your letters. The results of the review and evaluation have been reported and are enclosed.

It is clear that the facility assignment process used in the past and prior to the introduction of current procedures did not evaluate the relative hazards of operations and relative capabilities of facilities. Instead, the site selection was based primarily on facility operational attributes and availability in conjunction with radiological hazards (worker safety), industrial, and manufacturing efficiencies. There is no doubt that consideration of the relative hazards is a key element to an integrated approach to do work safely. We now have a process in place that meets this objective. The recent assignment of the W56 Dismantlement Program from Building 1284 to Building 1299 is evidence that this integrated selection process is now working.

AAO has examined four options for potential relocation of the W69 operations. This involved relocating operations, both planned and ongoing, in Buildings 1264, 1284, and 12-99. The options were identified because of ongoing and planned stockpile evaluation activities. Rebuild activities cannot be backfit into Building 1264 because weapons process requirements (e.g., temperature and humidity control and task exhaust) do not exist there. In each of the four options, AAO concluded that while it is feasible to relocate the W69 operations, it is not advantageous to do so. I agree with that conclusion based on the following:

Relocating the W69 operations impacts a variety of other weapon program activities in addition to the W69 activities. The results of a relocation would:

- Divert craft resources away from startup activities on critical new facilities [12116, 12-121, 12104A (paint bay)]. Delays will be on the order of 2 months from current schedules, thus, pushing back the opportunity to move into more modern facilities.
- Delay current pit packaging initiatives (e.g. AT-400A, sealedinsert) up to 22 months.
- Extend the overall dismantlement program (W69, W56, W79, etc.) by as much as 19 months. A more thorough discussion is provided in Attachment 1 to the enclosed AAO report. Extending the dismantlement programs will have a ripple effect that will impact the implementation of the Stockpile Life Extension Program, the W87 in particular.

We will evaluate the validity of past decisions as new information is available. As an example, we are currently investigating issues raised by the presence of ceiling cracks and their relationship to static loading in Building 12-64. Preliminary measurements taken within the facility indicate that we have adequate structural margin to continue operations. Additional measurements and analysis are being conducted and an outline of plans to conduct the measurements and analysis is provided in Attachment 4 to the enclosure. Mason & Hanger Corporation (MHC) has initiated the USQ process to resolve this issue. Because there is no comparable study of other facilities for comparison purposes, I am committed to continue seismic analyses in other facilities. If we are not able to establish an appropriate level of confidence in the structural adequacy of Building 1264, we will move the W69 operation to another facility.

The AAO will continue to work with the MHC to improve and refine the criteria used for facility selection. With the anticipated Department of Energy approval of the Pantex Integrated Safety Management Program Plan (PLN93, January 1998), which includes the Management Integration and Control Standards/Requirements Identification Document and reference to the Engineering Procedure 401110, the ISP will be linked to the facility selection through the Core Safety Function "Define Scope of Work."

Again, I want to stress that we have taken positive steps to improve the facilities selection process, improvements that make safety the priority. Your interest and engagement on this matter has proven beneficial. Should you have questions, please call me or Mrs. Lisa E. GordonHagerty on 3019033558.

Sincerely,

Gene Ives
Deputy Assistant Secretary
for Military Application and
Stockpile Management
Defense Programs

Enclosure

cc:
M. Whitaker, S3.1