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Department of Energy
National Nuclear Security Administration
Washington, DC 20585

March 30, 2001

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DNF SAFETY BOARD

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

Dear Mr. Chairman:

Consistent with the Department's implementation plan (IP) for the Defense Nuclear Facilities Safety Board (DNFSB) Recommendation 98-2, Revision 1, the following provides information regarding the commitment currently due during March 2001 and outstanding commitments due through February 2001. The Department proposes closure of those commitments indicated as complete.

Commitment Due During March 2001

- Commitment 4.2.3, "Development & Production Manual (D&P) 11.8 and Technical Business Practice (TBP) Impact Analysis and DOE-approved Implementation Plan." This is a new commitment as a result of the revision to 98-2. The purpose of this commitment is to ensure that the requirements for weapon response evaluation are incorporated into the management and operating (M&O) contract for the Pantex Plant and to require the M&O contractor to provide an impact analysis and IP to ensure compliance. As reported through the Department's letter to the Board dated January 30, 2001, the D&P, Chapter 11.8, was modified through Change 39 to incorporate the guidance for expectations and documentation of weapon response to potential accident environments and stimuli. The Pantex M&O has subsequently completed their impact analysis, as represented by their enclosed letter dated March 28, 2001. The impact analysis states that the requirements of D&P, Chapter 11.8, Change 39, have been implemented through MNL-254543, "Pantex Plant Integrated Safety Management (ISM) Authorization Basis (AB) Manual." The impact analysis further states that the contractual document, Management Integrated & Controls (MIC) Standards/Requirements Identification Document (S/RID) will be modified to adopt the requirements of Chapter 11.8. As a result of the submission of the impact analysis and the pending change to the MIC S/RID, this commitment is considered complete.



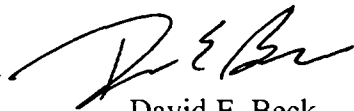
Outstanding Commitments Through February 2001

- Commitment 4.3.1, "DOE-approved BIO Module on Fire Protection and associated TSR and develop a resource-loaded schedule for implementation of improved TSR controls for fire protection." The DOE-approved BIO Module and TSR was provided to the Board through the Department's letter dated February 22, 2001. At that time, the IP was not yet available, but is expected to be provided in April 2001.
- Commitment 4.3.3, "DOE-approved BIO Module/TSR for On-Site Transportation and DOE-approved Implementation Plan for On-site Transportation controls submitted." This commitment is carried over from Commitment 5.6.3 #3 within the original IP. The purpose of this commitment is to improve the existing site-wide TSR controls for on-site transportation of nuclear explosives at the Pantex Plant. The status of this commitment was reported to the Board on February 22, 2001, and remains unchanged.
- Commitment 4.4.2, "Revisions to DOE Orders 452.1, 452.2, and DOE-STD-3015 issued." This commitment is carried over from Commitments 5.4.2 and 5.5.1 within the original IP. The purpose of this commitment is for the publication of the referenced orders and standard. The previously reported status, provided directly to the Board through the Assistant Deputy Administrator for Military Application and Stockpile Operations letter dated February 22, 2001, remains unchanged.
- Commitment 4.4.3, "Revisions to Albuquerque Operations Office (AL) Supplemental Directives 452.1 and 452.2 issued and Impact Analysis and DOE-approved Implementation Plan (as required)." This commitment is carried over from Commitments 5.4.2 and 5.5.1 within the original IP. The purpose of this commitment is for AL to issue revisions to its supplemental directives to align with the changes to Department of Energy (DOE) Orders 452.1, 452.2, and DOE-STD-3015 and invoke applicability of the revised directives through the existing contract structure for the Pantex Plant. The Pantex M&O contractor will then provide an impact analysis and an IP, if warranted, to achieve compliance with the new requirements. The status of this commitment was reported to the Board on February 22, 2001, and remains unchanged.
- Commitment 4.4.4, "Revisions to Nevada Operation Office (NV) Supplemental Directives 452.1 and 452.2 issued and Impact Analysis and DOE-approved Implementation Plan (as required)." This commitment is carried over from Commitments 5.4.2 and 5.5.1 within the original IP. The purpose of this commitment is for NV to issue revisions to the NV orders to align with the changes to DOE Orders 452.1, 452.2, and DOE-STD-3015 and invoke applicability of the revised directives through the existing contract structure for the Nevada Test Site. The M&O contractor and the design laboratories will then provide an impact analysis and IP, if warranted, to achieve compliance with the new requirements. The status of this commitment was reported to the Board on February 22, 2001, and remains unchanged.

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If you have any questions, please contact me at 202-586-4879, or have your staff contact Dan Glenn at 806-477-3182 or Karen Boardman at 505-845-6045.

Sincerely,



David E. Beck
Assistant Deputy Administrator
for Military Application and
Stockpile Operations
Defense Programs

Enclosure

cc w/enclosure:

M. Whitaker, S-3.1

R. Glass, AL

J. McConnell, DNFSB

W. Andrews, DNFSB

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**BWXT
Pantex**

P.O. Box 30020 Amarillo, Texas 79120 806/477-3000

MAR 28 2001

Don White, Acting Deputy Area Manager
U. S. Department of Energy
Amarillo Area Office
Amarillo, Texas

Subject: Impact Evaluation of the Development & Production (D&P) Manual AL 56XB, Change 39, Chapter 11.8, *Integration of Weapon Response Into Authorization Bases at the Pantex Plant*

Dear Mr. White:

In accordance with the terms of the Prime Contract, BWXT Pantex, LLC (BWXT Pantex) has performed an Impact Evaluation of the Development & Production (D&P) Manual AL 56XB, Chapter 11.8. The Compliance Impact Evaluation Table that documents the results of BWXT Pantex' evaluation is attached for your review.

Standards/Requirements Identification Document (S/RID) Change Requests have been submitted to adopt Chapter 11.8 during the next revision of the Management Integrated & Controls (MIC) S/RID, in the following Criteria:

- 1.2.2.a, *Hazards Assessments*
- 1.3.2.a, *Crosswalk to General Section*
- 1.3.2.b, *Operational Controls*
- 1.3.2.c, *Safety Standards*
- 1.4.2.a., *Crosswalk to General Section*

The requirements are currently implemented through MNI-254543, *Pantex Plant Integrated Safety Management (ISM) Authorization Basis (AB) Manual*. Results of the evaluation determined that the new and revised requirements of Chapter 11.8 can be implemented within the budget as currently authorized, and will have no impact on Work Authorization Directives (WAD) or contract line items. BWXT Pantex will maintain its current level of commitments in support of the Authorization Bases (AB) Programs.

If you have any questions, or require further clarification, please contact Virgil Hughes at extension 7797.

Very truly yours,



Scott W. Buker
Contracts Manager

ldm
Attachments: as stated

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Impact Evaluation of the Development & Production (D&P) Manual AL 56XB, Change 39, Chapter 11.8,
Integration of Weapon Response into Authorization Basis at the Pantex Plant

Page 2

cc:

M. Blackburn, DOE/AAO, 12-36A
R. Holm, WESTEC, 12-36A
M. Padilla DOE/AAO, 12-36A
D. Schmidt, DOE/AAO, 12-36A
R. Keller, BWXT Pantex, 12-11C

CO01-3497-0420

**Compliance Impact Evaluation
For**

D&P Manual AL 56XB, Chapter 11.8, *Integration of Weapon Response into Authorization Bases at the Pantex Plant,*

Statement Identifier	Statement Applicability						Control Attribute						Safety		Value Added		Exempt	Disposition/Discussion	
	No.	NA	P	Ex	R	D	G	M	Pv	Mi	Pr	I	Q	N	I	A	R		Ex
1.0			X					X						X	X				Purpose
2.0		X						X						X	X				Policy
3.0			X																Definitions
3.1				X				X						X	X				Control Classification Evaluation Guidelines - MIC S/RID criterion 1.3.2.c; Implemented through the Pantex Plant Integrated Safety Management Authorization Basis Manual, MNL-254543. PX-4546 has been submitted to adopt this requirement in the next revision of the MIC.
4.0			X																
4.1				X				X						X	X				Hazardous Event Identification - MIC S/RID criterion 1.3.2.b; Implemented through the Pantex Plant Integrated Safety Management Authorization Basis Manual, MNL-254543. PX-4546 has been submitted to adopt this requirement in the next revision of the MIC.
4.2	X																		Identify Reasonable Potential Controls - Responsibilities of the Labs.
4.3				X				X						X	X				Derive Controls - MIC S/RID criterion 1.3.2.b; Implemented through the Pantex Plant Integrated Safety Management Authorization Basis Manual, MNL-254543. PX-4546 has been submitted to adopt this requirement in the next revision of the MIC.

LEGEND:

Statement Applicability

NA - Not Applicable
P - Policy
Ex - Exposition
R - Applicable Requirement
D - Duplicate Requirement
G - General

Control Attribute

M - Mandatory
Pv - Prevention
Mi - Mitigation
Pr - Preservation
I - Integration
Q - Quality

Safety/Vulnerability Attribute

N - No Safety or Vulnerability Impact
I - Enhanced Safety or Lowered Vulnerability

Value Added

A - Adopt
R - Reject

Exemptions

Ex - Exemption Required

Compliance Impact Evaluation

For

D&P Manual AL 56XB, Chapter 11.8, Integration of Weapon Response into Authorization Bases at the Pantex Plant,

Statement Identifier	Statement Applicability						Control Attribute						Safety		Value Added		Exempt	Disposition/Discussion	
	No.	NA	P	Ex	R	D	G	M	Pv	Mi	Pr	I	Q	N	I	A	R		Ex
4.4				X				X						X	X				Weapon Response Uncontrolled Scenarios - MIC S/RID criterion 1.2.2.a; Implemented through the Pantex Plant Integrated Safety Management Authorization Basis Manual, MNL-254543. PX-4546 has been submitted to adopt this requirement in the next revision of the MIC.
4.5				X					X					X	X				Weapon Response Controlled Scenarios - MIC S/RID criterion 1.2.2.a; Implemented through the Pantex Plant Integrated Safety Management Authorization Basis Manual, MNL-254543. PX-4546 has been submitted to adopt this requirement in the next revision of the MIC.
4.6				X				X						X	X				Classify Controls - MIC S/RID criterion 1.3.2.a; Implemented through the Pantex Plant Integrated Safety Management Authorization Basis Manual, MNL-254543. PX-4546 has been submitted to adopt this requirement in the next revision of the MIC.
4.7				X				X						X	X				Residual Risk - MIC S/RID criterion 1.4.2.a; Implemented through the Pantex Plant Integrated Safety Management Authorization Basis Manual, MNL-254543. PX-4546 has been submitted to adopt this requirement in the next revision of the MIC.
5.0			X																Responsibilities
5.1				X				X						X	X				Project Team - MIC S/RID criterion 1.3.2.b; Implemented through the Pantex Plant Integrated Safety Management Authorization Basis Manual, MNL-254543
5.2	X																		Laboratories - Laboratories are responsible for this section

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**Compliance Impact Evaluation
For**

D&P Manual AL 56XB, Chapter 11.8, Integration of Weapon Response into Authorization Bases at the Pantex Plant,

Statement Identifier	Statement Applicability						Control Attribute						Safety		Value Added		Exempt	Disposition/Discussion	
	No.	NA	P	Ex	R	D	G	M	Pv	Mi	Pr	I	Q	N	I	A	R		Ex
5.3				X				X						X	X				Hazard Analysis Task Team - MIC S/RID criteria 1.2.2.a & 1.3.2.b; Implemented through the Pantex Plant Integrated Safety Management Authorization Basis Manual, MNL-254543. PX-4546 has been submitted to adopt this requirement in the next revision of the MIC.
5.4				X				X						X	X				Pantex Plant Operating Contractor - MIC S/RID criterion 1.3.2.b; The requirement will be added to the Pantex Plant Integrated Safety Management Authorization Basis Manual, MNL-254543, Section 5.3.2. PX-4546 has been submitted to adopt this requirement in the next revision of the MIC.
6.0	X																		Responsible Organization - Weapons Program Division (WPD) is responsible for this section.
Appendix A																			
A.1			X																General
Step 4.X.1				X				X						X	X				Request Weapon Response - MIC S/RID criteria 1.2.2.a; The requirement will be added to the Pantex Plant Integrated Safety Management Authorization Basis Manual, MNL-254543, Section 5.3.2. PX-4546 has been submitted to adopt this requirement in the next revision of the MIC.
Step 4.X.2	X																		Develop and Document Weapon Response - Laboratories is responsible for this step.

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**Compliance Impact Evaluation
For**

D&P Manual AL 56XB, Chapter 11.8, Integration of Weapon Response into Authorization Bases at the Pantex Plant,

Statement Identifier	Statement Applicability						Control Attribute						Safety		Value Added		Exempt	Disposition/Discussion	
	No	NA	P	Ex	R	D	G	M	Pv	Mi	Pr	I	Q	N	I	A	R		Ex
Step 4.X.3					X				X						X	X			Weapon Response Review and Approval - MIC S/RID criterion 1.3.2.a; The requirement will be added to the Pantex Plant Integrated Safety Management Authorization Basis Manual, MNL-254543, Section 5.3.2. PX-4546 has been submitted to adopt this requirement in the next revision of the MIC.
Step 4.X.4	X																		Issuing Weapon Response Information - Laboratories are responsible for this step
Step 4.X.5					X				X						X	X			Incorporation of Weapon Response Information - MIC S/RID criteria 1.2.2.a and 1.3.2.b; Implemented through the Pantex Plant Integrated Safety Management Authorization Basis Manual, MNL-254543. PX-4546 has been submitted to adopt this requirement in the next revision of the MIC.
A.2			X																

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