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Department of Energy **National Nuclear Security Administration** Pantex Site Office P. O. Box 30030 Amarillo, TX 79120



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onorable A. J. Eggenberger
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se Nuclear Facilities Safety Board
diana Avenue, NW
700
ngton, DC 20004

NNSA Readiness Review Validations of On-site Transportation Technical Safety
Requirements The Honorable A. J. Eggenberger Chairman Defense Nuclear Facilities Safety Board 625 Indiana Avenue, NW Suite 700 Washington, DC 20004

RE:

Requirements

Dear Mr. Chairman:

The Pantex Site Office (PXSO) is pleased to report the completion of the NNSA readiness review validations of all Pantex on-site transportation technical safety requirements (TSR). These controls enhance the safety of on-site nuclear explosives and nuclear material movements. PXSO elected to validate the on-site transportation controls in four readiness assessments performed in accordance with DOE Order 425.1.C after the controls were declared effective by BWXT. Validation using the Department's readiness review process has proven beneficial in ensuring the controls are flowed down into appropriate procedures/work instructions and that they are well understood by Pantex personnel.

In Commitment 4.3.4 of the Department's Implementation Plan for DNFSB Recommendation 98-2, we committed to validate implementation of the TSR controls for on-site transportation of nuclear explosives at Pantex and provide the Board with the final report. PXSO has been providing information for the 98-2 Quarterly Report on the status of 44 on-site transportation TSRs. This represents the entire set of controls related to movement of all nuclear materials on-site (not just the movement of nuclear explosives) since we knew the Board was interested in those as well.

In the last 98-2 Quarterly Report dated October 28, 2005, it was explained that two of the controls are no longer required as TSR level controls and two have been identified as planned improvements since existing transportation controls provide the necessary protection. Attachment 1 shows all 44 controls identified by the TSR Integrated Implementation Plan number and organized by the PXSO readiness review that validated implementation. It also identifies the four that are either no longer required or are identified as a planned improvement. Since the amount of documentation associated with the readiness assessments is very extensive, we did not include it in this correspondence. We have gone over the details with and have provided copies to your local site representatives.

Pantex is making significant safety improvements through the implementation of TSRs. PXSO is committed to ensuring implementation of all TSR controls at Pantex in the near future and will keep the Board informed through interaction between our staffs on that progress. With this correspondence, the Department considers Commitment 4.3.4 of the 98-2 implementation Plan completed.

If you have questions, please contact me at (806) 477-3180 or Steve Erhart of my staff at (806) 477-6150.

Sincerely,

Daniel E. Glenn Manager

Attachment

cc w/attachment:

M. Schoenbauer, NA-12, FORS

X. Ascanio, NA-124, GTN

M. Whitaker, NA-122.5, AL

S. Erhart, PXSO, 12-36

K. Waltzer, PXSO, 12-36

ATTACHMENT 1

PXSO Validation of Pantex On-Site Transportation Controls

TSRIIP Group 1, 2, and 3 Readiness Assessment (November 2004)

TSAR IIP Control#	Control Title	TSAR Reference
#117	Loading Dock Hydraulic Leveler	4.3.1.4

Note: The Readiness Assessment report is documented in PXSO Glenn/Mallory memorandum dated December 22, 2004. There were two controls, Vehicle Separation [AC 5.6.22(1)] and MAA Speed Limit [AC 5.6.22(3)] that were also reviewed in this assessment. These two controls were subsequently revised and reassessed in the TSRIIP Group 3.5/4 Readiness Assessment (see control #161 and #165 below).

TSRIIP Group 3.5 and 4 Readiness Assessment (April 2005)

TSAR IIP Control#	Control Title	TSAR Reference
#118	Portable Lights	4.3.1.14
#130	NE or NM Transport Tractor	4.3.1.2
#160	Trailer Loading	4.4.2.4
#161	Vehicle Separation	4.3.2.9
#162	Pull Test	4.4.2.5
#163	Convoy Right-of-Way	4.3.2.11
#164	Convoy Escorts	4.3.2.12
#165	Pantex Speed Limit	4.3.2.13
#166	Convoy Speed Limit	4.3.2.14
#324	Operations Manager	4.3.2.21

Note: The Readiness Assessment report is documented in PXSO Glenn/Mallory memorandum dated August 12, 2005.

TSRIIP Group 4.5 Readiness Assessment (October 2005)

TSAR IIP Control#	Control Title	TSAR Reference
#126	Facility Structure – Loading Docks	4.3.1.10
#129	Roll-up Door Pins	4.3.1.16
#133	NE/NM Transport Trailer Tie-	4.4.1.1
	Downs	
#158	Authorized Operations	4.3.2.2
#168	Walker/Spotter	4.3.2.4
#169	Safeguards and Security Program	4.3.2.18
#170	Use of Tie-downs	4.4.2.1
#254	Crane Use Authorization	4.3.2.15
#256	Explosive Safety Program	4.3.2.19

Note: The Readiness Assessment report is documented in PXSO Glenn/Mallory memorandum dated November 2, 2005.

TSRIIP Remaining Controls Readiness Assessment (November 2005)

TSAR IIP Control#	Control Title	TSAR Reference
#116	Flatbed Trailer	4.3.1.3
#119	Protective Cover	4.3.1.13
#120	NE/NM Transport Trailer	4.3.1.1
#125	Facility Structure Ramps/Corridors	4.3.1.9
#127	**HETC	4.3.1.17
	**Planned Improvement – PXSO determined other controls provide adequate protection	
#128	*T3 Wire Basket	4.4.1.2
	*Deleted. PXSO determined not required as TSR control	
#131	ETC I	4.3.1.11
#132	ETC II	4.3.1.12
#159	NE/NM Handlers	4.3.2.6
#167	Road Closure	4.3.2.16
#180	*Qualified Containers	4.4.2.3
	*Deleted. PXSO determined not required as TSR control	
#216	**Qualified Flammable Liquid Transportation and Storage Container	4.3.1.15

	**Planned Improvement – PXSO determined other controls provide adequate protection.	
#217	Forklifts	4.3.1.8
#221	Tow motors	4.3.1.7
#222	Forklift/Tow motor Operations	4.3.2.5
#251	Move Authorization	4.3.2.1
#252	Transportation of Flammables	4.3.2.3
#253	Transportation of Explosives	4.3.2.10
#255	MAA Operational Requirements	4.3.2.17
#257	NM & HE Inventory Control Program	4.3.2.20
#371	NE/NM Handlers	Chapter 3
#372	Approved Container Program	Chapter 3
#373	Use of Tie-downs	Chapter 3
#374	NE/NM Transport Trailer Tie-downs	Chapter 3

Note: The Readiness Assessment report is documented in PXSO Glenn/Mallory memorandum dated November 30, 2005.