

DEFENSE NUCLEAR FACILITIES SAFETY BOARD

July 30, 2004

MEMORANDUM FOR: J. K. Fortenberry, Technical Director
FROM: T. Hunt and W. White, Pantex Site Representatives
SUBJECT: Pantex Plant Activity Report for Week Ending July 30, 2004

Violation of Safety Controls. On Wednesday, the site representative raised the concern with BWXT and PXSO that a compensatory measure in the *Justification for Continued Operations (JCO) for Nuclear Material and Staging Operations in Pantex* was not in place. The compensatory measure in question requires a thermal monitoring system with an automated alert to the Pantex Operations Center for air-conditioned facilities storing the pit types covered by the JCO. The description section of this JCO notes the thermal monitoring system for certain facilities does not have an automated alert capability, but nevertheless requires it for those facilities staging the pit types of concern. Based on a review of available flow down documentation, BWXT apparently intended to implement the control by prohibiting the staging of the pit types of concern in facilities without the automated alert system. This was never done, however, and a significant number of these pit types are now stored in facilities with air conditioning but without an automated alert capability.

This is the second occurrence in as many weeks in which a compensatory measure from a JCO was found to be implemented inadequately. The BWXT process for developing and implementing authorization basis documents is defined in plant standard 3071, *Development, Implementation, and Control of Authorization Basis Documents*. Although this standard identifies readiness verifications and readiness assessments as methods for validating the implementation of authorization basis documents, BWXT conducts only limited verifications within the Authorization Basis Department for JCOs and minor authorization basis changes.

As an immediate compensatory measure, BWXT began hourly monitoring of the temperature in the locations of concern. BWXT also began processing a near-term work order to install an automated alert system where required. In addition, BWXT will review the flow down of compensatory measures in all of the active JCOs. A causal analysis will review the BWXT process for verifying the implementation of JCOs and minor authorization basis changes and the manner in which this particular compensatory measure was written. [I, W4]

10 CFR 830 Exemption Request. BWXT sent a letter to PXSO this week requesting that PXSO pursue an extension of the existing temporary exemption to the documented safety analysis requirements in 10 CFR 830 for the W87 program. An earlier exemption signed by NA-10 expires on July 31, 2004. The letter requests an extension of "up to six weeks following resumption of Pantex, Lawrence Livermore National Laboratory (LLNL), and Sandia National Laboratories operations." BWXT notes this time period will allow two weeks for LLNL and Sandia to complete and submit the weapon response necessary for the W87 documented safety analysis and will allow BWXT four weeks to review the final weapon response and incorporate any necessary changes to the documented safety analysis draft that currently exists. The exemption request claims that all identified controls that address nuclear material releases in the current, draft version of the documented safety analysis are already in place, although they are not necessarily controlled as technical safety requirements. This exemption extension request follows a similar request for the W88 program, whose current exemption also expires on July 31, 2004. [I, W3]