

September 10, 2004

The Honorable Linton Brooks
Administrator
National Nuclear Security Administration
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585-0701

Dear Ambassador Brooks:

The Defense Nuclear Facilities Safety Board (Board) received a letter dated August 9, 2004, from the National Nuclear Security Administration (NNSA) requesting a second 90-day extension for a report requested by the Board on conduct of engineering at Los Alamos National Laboratory (LANL). On January 27, 2004, the Board requested a report that would:

- Outline the milestones and completion dates for the incorporation of Department of Energy (DOE) Order 420.1A, *Facility Safety*, and its guidance into LANL requirements and guidance documents. This plan should encompass the application of those requirements and the associated guidance to new safety-class and safety-significant structures, systems, and components within existing facilities, whether those structures, systems, and components are associated with facility or nonfacility work.
- Outline how to determine when the application of engineering practices, such as a conceptual design phase and independent design reviews, would improve the safety of nonfacility projects, and what changes are needed in LANL requirements, guidance, and training to effect this application.
- Outline requirements, guidance, and training needed at LANL to ensure that appropriate reviews of design adequacy are conducted for existing structures, systems, and components newly designated as safety-class or safety-significant.

The Board also stated that the latter two items should identify actions to implement the needed changes in a timely manner.

In its first request for an extension, NNSA reported some progress toward enhancing conduct of engineering work for facility work, but stated that a significant effort was still required to develop a program and an implementation plan for nonfacility work, such as

research, development, demonstration, testing, and production. The August 9, 2004, letter from NNSA requesting a second 90-day extension noted that the laboratory director had ordered a suspension of most activities at LANL, and stated that the development of a resource-loaded implementation plan is tied to the resumption process.

It is clear from briefings to the Board on July 14 and August 19, 2004, that significant effort remains to finalize the implementation plans, particularly for the application of engineering practices to nonfacility work. While the Board agrees to the requested extension, NNSA should ensure that the report is timely and includes detailed, resource-loaded implementation plans and schedules fully addressing all three items listed above.

Sincerely,

John T. Conway
Chairman

c: Mr. Mark B. Whitaker, Jr.
Mr. Edwin L. Wilmot