Ms. Kathleen A. Carlson Acting Deputy Administrator for Defense Programs Department of Energy 1000 Independence Avenue, SW Washington, D.C. 20585-0104

Dear Ms. Carlson:

The Defense Nuclear Facilities Safety Board (Board) has noted numerous recent incidents involving inadequate procedural compliance at the Pantex Plant. The Department of Energy's (DOE) Occurrence Reporting and Processing System contains reports from more than 50 such incidents at Pantex since January 2001, including, for example, missed steps, steps performed out of sequence, violations of procedural requirements, and use of wrong procedures. Of particular concern is the fact that at least 10 of these incidents involved work performed directly on nuclear explosives.

On several occasions, the Board has emphasized the essential role played by formal conduct of operations in ensuring the safety of activities involving nuclear explosives. DOE's significant reliance on administrative controls rather than engineered controls to implement many of the Technical Safety Requirements at Pantex necessitates strict procedural compliance for all work involving nuclear explosives at the site.

Accordingly, pursuant to 42 U.S.C. § 2286b(d), the Board requests that DOE present a briefing within 30 days of receipt of this letter providing details on the procedural compliance issues at Pantex and the corrective actions proposed by DOE.

Sincerely,

John T. Conway Chairman

c: Mr. Mark B. Whitaker, Jr. Mr. Richard E. Glass Mr. Daniel E. Glenn