



Department of Energy

Washington, DC 20585

April 17, 2014

Mr. John D. Woolery
President and General Manager
B&W Pantex, LLC
Pantex Plant
P.O. Box 30020
Amarillo, Texas 79120-0020

WEL-2014-02

Dear Mr. Woolery:

The Office of Health, Safety and Security's Office of Enforcement and Oversight evaluated six events related to worker safety and health that B&W Pantex, LLC, has reported to the U.S. Department of Energy (DOE) since August 2012. The events are significant in that they involved improper management, handling, or labeling of highly hazardous materials, including explosives, which have the potential to cause serious injury or death. Collectively, the events indicate potential problems with the quality of training, operating procedures, material management practices, and verification methods, as well as evidence of issues in human performance. A brief summary of each event is provided below.

- July 2012: A Class 1.1D explosive material was discovered in a bay that was not approved for storage of that material. Class 1.1D explosives comprise detonating cord and blasting explosives with mass explosion potential, necessitating strict adherence to administrative processes.
- March 2013: Personnel who were packaging two items containing special nuclear material (SNM) switched barcodes and applied paperwork to the wrong containers, creating the possibility that the materials might not be handled subsequently in a manner consistent with their respective hazards.
- July 2013: During processing of a legacy component for sanitization, an explosive part was discovered in a location and condition that was not suitable for handling explosives.
- August 2013: SNM was moved during a time when movement of a high explosive was planned. The software that was intended to prevent such simultaneous movements reportedly failed due to an issue that had not been discovered during testing. This event indicates both human performance and material management issues, since software designed for safety significant operations should undergo sufficient testing to identify errors prior to use.
- September 2013: During a visual inspection of 2 explosive and 13 non-explosive legacy shipping containers, it was discovered that 11 of the 13 non-explosive containers did, in fact, contain explosives. While B&W Pantex reported no danger to the public, the environment, or the facility from this event, the event is consistent with continuing issues in explosive material disposition.



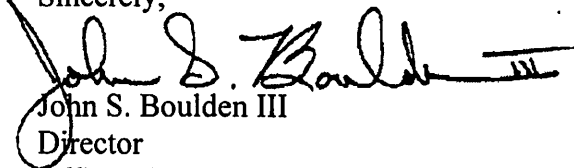
- October 2013: A transportation material handler discovered several discrepancies in the labeling of explosive material containers. In one case, in an attempt to resolve a discrepancy, B&W Pantex personnel inappropriately removed a label, and the material was shipped. That event resulted in the shipment of incompatible explosive materials.

The events involved the handling of explosives or highly hazardous materials, which warrants strict adherence to conduct-of-operations principles. The occurrence reports for these events identify corrective actions that are focused on the specific individual incidents. To assess overall program effectiveness and identify potential programmatic weaknesses, B&W Pantex should consider reviewing training procedures, administrative control measures, material handling systems, and quality assurance processes.

The Office of Enforcement and Oversight is issuing this letter to convey concerns about the level of rigor applied by B&W Pantex in safely executing work and in accordance with DOE worker safety and health requirements and conduct of operations principles for highly hazardous materials. B&W Pantex should examine the broader issues identified in this letter and determine whether additional corrective actions may be warranted. The Office of Enforcement and Oversight has elected to exercise enforcement discretion and not pursue further enforcement activity at this time. However, the Office of Enforcement and Oversight and the National Nuclear Security Administration Production Office will continue to closely monitor the effectiveness of the B&W Pantex worker safety and health program in ensuring proper management, handling, and labeling of hazardous materials.

No response to this letter is required. If you have any questions, please contact me at (301) 903-2178, or your staff may contact Mr. Kevin Dressman, Director, Office of Worker Safety and Health Enforcement, at (301) 903-0100.

Sincerely,



John S. Boulden III

Director

Office of Enforcement and Oversight
Office of Health, Safety and Security

cc: Steve Erhart, NA-NPO
Rick Haynes, NA-NPO
Kathy Brack, B&W Pantex, LLC
Richard Rebak, DNFSB