

**Congress of the United States**  
**Washington, DC 20515**

May 25, 2005

The Honorable Anthony J. Principi  
Chairman, BRAC Commission  
2521 S. Clark Street, Suite 600  
Arlington, VA 22202

Dear Chairman Principi:

During the BRAC Commission's May 17 hearing with Navy officials, Chief of Naval Operations Admiral Vernon Clark made two statements in need of correction.

First, Admiral Clark stated that the capacity in private shipyards was a consideration in the Defense Department's determination that there was excess capacity among the four public U.S. Navy shipyards.

We were shocked to hear this, as we are unaware that capacity in the private sector has ever been a legal or legitimate consideration in the Department's BRAC data collection and analysis processes. To our knowledge, there have been no data calls under the BRAC process of the nation's private sector nuclear shipyards. Without such data, there can be no proper analysis comparable to what was applied to the public shipyards. Without such analysis, we challenge the legitimacy of including private shipyards in the justification for reducing public shipyard infrastructure.

Second, Admiral Clark cited the end of the refuelings of Los Angeles class submarines as a justification to close the Portsmouth Naval Shipyard (PNSY). This reasoning is not supported by the facts. Significant maintenance requirements remain on the second flight of Los Angeles class submarines. The first two (of thirty-one) Engineered Overhauls (EOH) are currently in execution at Portsmouth. An EOH work package constitutes approximately 240,000 mandays, or more than two thirds the size of an Engineering Refueling Overhaul (ERO, at 330,000 mandays). PNSY is scheduled to conduct seven EOHs by 2011, which is the equivalent of more than five EROs. PNSY would perform about two EOHs per year between 2012 and 2018 if the Navy distributes workload evenly among the four public shipyards.

PNSY is also scheduled to perform Depot Modernization Periods (DMPs, 180,000 mandays), Selected Restricted Availabilities (SRAs), Interim Drydocking Availabilities (IDDs), Pre-Inactivation Restricted Availabilities (PIRAs), and Inactivations on Los Angeles class submarines. SeaWolf and Virginia class submarine maintenance has also been assigned to Portsmouth beginning in 2011.

BRAC, shipyard clarifications, p. 2

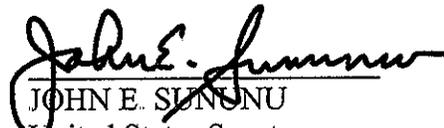
We urge your consideration of our clarification of the facts as the Commission reviews the military value of the Portsmouth Naval Shipyard.

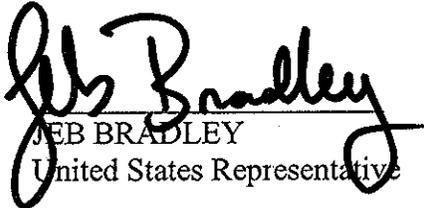
Sincerely,

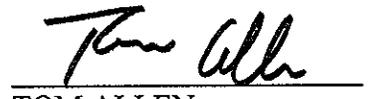
  
OLYMPIA J. SNOWE  
United States Senator

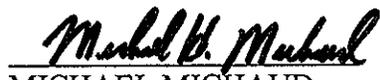
  
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