



Department of Energy

Washington, DC 20585

September 29, 1999

The Honorable John T. Conway
Chairman
Defense Nuclear Facilities Safety Board
625 Indiana Ave, NW, Suite 700
Washington, DC 20004

Dear Mr. Chairman:

We have received your August 27, 1999, letter addressing the Rocky Flats Environmental Technology Site's (RFETS) Plutonium Stabilization and Packaging System (PuSPS). We are aware of RFETS' concern with its ability to meet the DOE-STD-3013-96 requirement to limit the level of contamination of the outer surface of the inner can to levels defined in 10 CFR 835. Furthermore, we have received a position paper from RFETS aimed at eliminating the contamination level requirement and allowing the Sites to use best operating practice and ALARA to control contamination. Currently, we are reviewing this request and its impact on the revised long term storage standard, as well as any impact on the Materials Disposition (MD) facilities interface.

In reference to the revised long term storage standard, we plan to issue this standard in October, including the requirement that contamination of the outer surface of the inner can is consistent with 10 CFR 835.

RFETS will formalize their technical position on the requirement for a contamination-free inner can and submit a request to remove this requirement from the revised standard. This request will be submitted to a Technical Review Board (TRB) for evaluation. This TRB will be comprised of representatives from Environmental Management (EM), Defense Programs (DP), MD under DOE-AL, and will be chartered to consider any requests from the Sites regarding operational problems resulting from the implementation of the long term storage standard. The 94-1 responsible manager, in consultation with your staff, will make the decision on whether to grant a deviation from, or proceed with, a standard revision process.

We will keep you informed of our future actions and continue to work with your staff on this and any other PuSPS issues.

Sincerely,

A handwritten signature in cursive script that reads "Carolyn L. Huntoon".

Carolyn L. Huntoon
Assistant Secretary for
Environmental Management