DEFENSE NUCLEAR FACILITIES SAFETY BOARD

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April 29, 2010

The Honorable Inés R. Triay Assistant Secretary for Environmental Management U. S. Department of Energy 1000 Independence Avenue, SW Washington, DC 20585-0113

Dear Dr. Triay:

The staff of the Defense Nuclear Facilities Safety Board (Board) recently reviewed the Integrated Facility Aging Management (IFAM) program at the Savannah River Site (SRS). The Board has been mindful for several years of the deterioration resulting from the aging of key SRS facilities. Identification of aging systems, evaluation of necessary aging management measures, and implementation of those corrective measures are the Board's primary concerns.

In 2006, the Department of Energy (DOE) directed an engineering assessment of H-Canyon be performed to ensure that its facilities could operate cost-effectively through 2019. At that time, the Board concluded that the strategy for upgrading the safety basis appeared reasonable, but a systematic life extension evaluation was needed to ensure continued safe operations. In 2007, DOE Headquarters suggested SRS managers develop a robust integrated facility aging management plan for H-Canyon. Accordingly, DOE and its contractor established the IFAM program, which has generated more than 60 recommendations.

The IFAM program has identified repair or replacement needs that are placed on the H-Area Infrastructure Upgrades List. Funding to address the needs on this list has fallen short of 2007 planning assumptions. The contractor has used operating funds to complete many of the smaller and/or safety-related IFAM repairs, but many of the highest cost items continue to go unaddressed. The delay in addressing these items increases the potential risk that aging equipment will interrupt future operations, which could jeopardize DOE's plan for safe disposition of enriched uranium (and other hazardous materials) from across the defense nuclear complex. In the interim, to mitigate risks associated with failure of aging equipment, DOE and its contractor should compensate with enhanced surveillance, maintenance, and administrative controls.

The SRS contractor is aggressively preparing to resume spent fuel processing at H-Canyon later this year; however, DOE still has not conclusively identified and determined the scope and quantities of the materials that will be processed, and over what time period. This uncertainty makes it even more difficult for the contractor to decide which upgrades to pursue.

Therefore, pursuant to 42 U S.C. § 2286b(d), the Board requests DOE submit a report within 90 days of receipt of this letter providing a schedule for completing known upgrades necessary to support the H-Canyon mission, and DOE's plans for evaluating and addressing agetelated degradation in H-Canyon.

Sincerely,

Peter S. Winokur, Ph.D.

Chairman

Enclosure

c: Mr. Jack R. Craig Mr. Mark B. Whitaker, Jr.