



Department of Energy
National Nuclear Security Administration
Washington, DC 20585

January 15, 2003

The Honorable John T. Conway
Chairman
Defense Nuclear Facilities Safety Board
625 Indiana Avenue, NW.
Suite 700
Washington, D.C. 20004-2901

Dear Mr. Chairman:

The National Nuclear Security Administration (NNSA) has received your letter of November 13, 2002, regarding Pantex's interpretation of DOE STD-3009-94. Your letter took issue with how the Continuous Air Monitor and Radiation Alarm Monitor (CAM/RAM) systems are credited in-site authorization basis documents. The NNSA agrees with the Defense Nuclear Facilities Safety Board (DNFSB) that the hazardous scenarios in question warrant Technical Safety Requirement (TSR) level control. NNSA's Pantex Site Office (PXSO) approved authorization basis documents that credit the CAM/RAM systems as a TSR-level administrative control program, whereas your letter advised that these systems should be credited as safety significant controls.

After discussions with your staff, PXSO has directed the Pantex contractor to make changes to the authorization basis documents. These changes, detailed in the enclosure, will eliminate exclusive reliance on the CAM/RAM systems for worker protection without changing their designation to safety significant. These systems will also continue to be credited as TSR-level controls.



If you have further questions, please contact me or have your staff contact Mr. David E. Beck at 202-586-4879, Mr. Jeff Underwood at 301-903-8303, or Mr. Steve Erhart of PXSO at 806-477-6150.

Sincerely,

A handwritten signature in black ink, appearing to read "Everet H. Beckner". The signature is fluid and cursive, with the first name "Everet" and last name "Beckner" clearly distinguishable.

Everet H. Beckner
Deputy Administrator
for Defense Programs

Enclosure

cc w/enclosure:
Mark Whitaker, EH-9

NNSA Actions to Address Concerns of DNFSB Letter of November 13, 2002

The PXSO will direct the Pantex contractor to take the following actions relative to authorization basis documents that contain scenarios for which the Continuous Air Monitor and Radiation Alarm Monitor (CAM/RAM) systems are currently credited as the only control to prevent potentially significant worker exposure:

- Each scenario involving potential significant exposure to the worker will be identified and the initiator will be clearly defined (i.e., reservoir drop, squib valve actuation, pit drop, etc.)
- Worker training that ensures the worker will exit the facility immediately once any of these initiators have occurred will be identified as the primary control to prevent significant exposure.
- The revisions to the AB documents will occur as part of the next annual update.

The CAM/RAM systems will continue to be credited via a Technical Safety Requirement level administrative control program.