

Department of Energy National Nuclear Security Administration

Washington, DC 20585

August 31, 2009

OFFICE OF THE ADMINISTRATOR

The Honorable John E. Mansfield Vice Chairman Defense Nuclear Facilities Safety Board 625 Indiana Avenue, NW, Suite 700 Washington, D.C. 20004

Dear Mr. Vice Chairman:

On July 12, 2006, Secretary Bodman submitted the Department of Energy's (DOE) revised Implementation Plan (IP) for Defense Nuclear Facilities Safety Board Recommendation 2004-2, *Active Confinement Systems*. Deliverable 8.6.3 of the IP consists of facility-specific confinement ventilation system (CVS) evaluations performed by the Site Offices in accordance with the Department's Ventilation System Evaluation Guidance. Deliverable 8.6.5 consists of Program Secretarial Office concurrence and approval of the disposition of gaps and upgrades. This letter and its enclosures comprise Deliverables 8.6.3 and 8.6.5 for Annular Core Research Reactor (ACRR) at Sandia National Laboratories (SNL), Albuquerque, NM.

The evaluation concludes that the ACRR ventilation systems were neither designed nor required to prevent exceeding the evaluation guideline (EG) for the analyzed accidents. Though the systems are typically operated in support of ACRR operations, they are not credited in the ACRR accident analysis to function during normal, abnormal, or anticipated accident conditions to prevent or mitigate exposures. While the ventilation systems would have an impact on normal, abnormal or anticipated accident conditions, major facility modification or construction of a new facility would be required to be able to take credit for the function in the Safety Analysis. Therefore, the costs associated with modifying/upgrading the ventilation systems to meet the criteria for creditable active confinement ventilation systems would be difficult to justify.

In accordance with the IP and National Nuclear Security Administration (NNSA) guidance dated December 6, 2006, the DOE Independent Review Panel (IRP) and the NNSA Central Technical Authority's Chief of Defense Nuclear Safety (CDNS) performed separate reviews of the evaluation and its conclusions. The NNSA CDNS and IRP have concluded that the evaluation and its results are technically sound and appropriate, and meet the intent of the IP. Our review concurs with the conclusions reached by the Site, IRP, and CDNS.



If you have any questions concerning this letter or its enclosures, please contact me or have your staff contact Kim Loll at (202) 586-8955 or <u>Kim.Loll@nnsa.doe.gov</u>.

Sincerely,

Thomas P. D'Agostino

Administrator

Enclosures