



Department of Energy

Washington, DC 20585

June 30, 2010

The Honorable Peter S. Winokur
Chairman
Defense Nuclear Facilities Safety Board
625 Indiana Avenue, N.W., Suite 700
Washington, DC 20004-2901

Dear Mr. Chairman:

In your March 15, 2010, letter the Defense Nuclear Facilities Safety Board (Board) expressed concern over recently approved documented safety analysis in which the mitigated dose consequences to the public exceeded Department of Energy's (DOE) Evaluation Guideline presented in Appendix A to DOE Standard 3009. Your letter contained two sets of questions. On June 10, 2010, Daniel Poneman, Deputy Secretary of Energy, addressed your first set of questions related to the regulatory status of DOE Standard 3009 and our regulatory framework for ensuring adequate protection of the public. The Deputy Secretary requested the responsible program offices to provide information directly to you on their defense nuclear facilities in which accident analysis calculations do not demonstrate that safety class controls will mitigate dose consequences to below the DOE Standard 3009 Evaluation Guideline and what barriers exist to prevent DOE from meeting the Evaluation Guideline (i.e. the second set of questions).

This letter provides Environmental Management's (EM) response (Enclosure 1). The only DOE facility managed by EM that appears to exceed the Evaluation Guideline with Documented Safety Analysis (DSA) credited Safety Class controls is the Concentration, Storage, and Transfer Facility (CSTF) at the Savannah River Site (SRS). SRS CSTF (i.e., Tank Farms) have unmitigated dose consequences above the Evaluation Guideline. In our review, we noted that for the events where the dose consequence is above the Evaluation Guideline, the DOE Safety Evaluation Report (SER), which approved the DSA, appears to credit controls and analyses that should, more appropriately, be contained in the Documented Safety Analysis (DSA). Specifically, the controls that prevent explosions associated with seismic events and accompanying analyses are expected to be in the DSA rather than residing in the SER. Therefore, EM Headquarters requested SRS to resolve this by revising the SRS CSTF DSA to better document the controls and analyses applied to prevent these accidents, and to provide a schedule for completion of this activity (Enclosure 2). EM Headquarters will monitor completion of this work, and keep the Board staff informed. A report concerning the SRS CSTF and the response to your questions is enclosed.



If you have any questions or require further information, please contact me or Dr. Steven L. Krahn, Deputy Assistant Secretary for Safety and Security Program at (202) 586-5151.

Sincerely,

A handwritten signature in black ink that reads "Inés R. Triay". The signature is written in a cursive style with a large initial 'I' and a long, sweeping tail on the 'y'.

Inés R. Triay
Assistant Secretary for
Environmental Management

Enclosures