



**The Secretary of Energy**  
Washington, DC 20585

March 11, 2003

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

Dear Mr. Chairman:

Thank you for your letter regarding the Defense Nuclear Facilities Safety Board's (Board) concern for the improper interpretation and implementation of the Department of Energy's (DOE) guidance provided in DOE-STD-3009, *Preparation Guide for U.S. Department of Energy Nonreactor Nuclear Facility Documented Safety Analyses*.

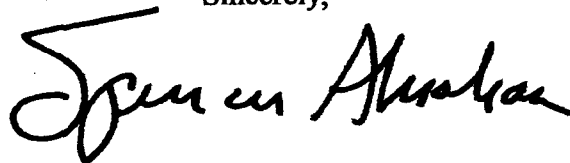
Line management is responsible for establishing realistic yet conservative input conditions necessary to achieve a representative set of bounding consequences in the facility or activity safety analysis. Selecting and defending a set of realistic and conservative input conditions is a process that is very important and complex where safety professionals can differ in approaches. In order to meet Title 10 of the Code of Federal Regulations (CFR) Part 830 (10 CFR Part 830) schedule of April 10, 2003, for the submittal of DSA for DOE review and approval, it is crucial to have the DOE line organizations review and assess the input conditions used in DSA development at selected facilities under their responsibility.

Your concern is supported by a number of instances, identified by your staff, where Documented Safety Analyses (DSA) do not properly reflect bounding conditions when estimating the unmitigated consequences of postulated accidents. This letter is in response to your request that we keep you informed of our activities and initiatives to address this concern.



I have asked the Office of Environmental Management (EM) and the National Nuclear Security Administration (NNSA) to initiate appropriate actions within their organizations to address your concerns and keep the DNFSB and the staff informed.

Sincerely,

A handwritten signature in black ink that reads "Spencer Abraham". The signature is written in a cursive style with a large, sweeping initial "S".

Spencer Abraham

cc:

J. Roberson, EM-1  
L. Brooks, NA-1  
W. Magwood, NE-1  
G. Pondonsky, OA-1  
R. Orbach, SC-1  
M. Whitaker, S-3.1  
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