



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

April 18, 1990

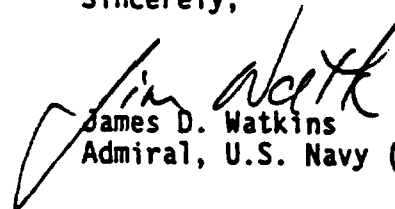
Mr. John T. Conway  
Chairman  
Defense Nuclear Facilities Safety Board  
600 E Street, N.W.-Suite 675  
Washington, D.C. 20004

Dear Mr. Chairman:

As I implied in the memorandum I forwarded to you on March 13, I agree with the Board that the adequacy of existing Department of Energy (DOE) standards, as interpreted and applied at the DOE defense nuclear facilities, is in need of a thorough review. Partly for the reasons cited by the Board in its March 8 letter to me (the apparent lack of specificity, uniformity, and varied applicability of the DOE Orders), and partly because of the amount and nature of the information needed to comply with the Board's recommendations, the Department is unable at this time to provide a comprehensive response. Enclosed is a memorandum from Defense Programs and the Office of Environmental Restoration and Waste Management requesting from the appropriate field offices some of the information that will be needed to provide a coordinated response to the Board's recommendations. In the meantime, I am writing to formally request, pursuant to the provisions of 42 U.S.C. 2286d, a 45-day extension beyond the prescribed date for publishing DOE's response to the Board's recommendations of March 8 in the Federal Register.

As you know, I recently formed a Task Force within the Department to review DOE's nuclear safety related directives in order to identify those basic safety requirements which ought to be issued as regulations through notice-and-comment rulemaking. While the work of the Task Force will not be completed in the next 90 days, it should be far enough along by then to provide another portion of the information that we require to be fully responsive to the significant and complex issues the Board has raised.

Sincerely,

  
James D. Watkins  
Admiral, U.S. Navy (Retired)

Enclosure

cc: V. Stello, DP-2  
L. Duffy, EM-1  
S. Blush, NS-1

# Memorandum

DATE March 23, 1990

REPLY TO DP-8  
ATTN OF.

SUBJECT: Defense Nuclear Facilities Safety Board Recommendations Concerning Defense Nuclear Facility Standards

TO: Manager, SR  
Acting Director, SRSPO  
Manager, AL  
Manager, RL  
Manager, RFAO

In a letter dated March 8, 1990, the Defense Nuclear Facilities Safety Board provided two recommendations concerning the application of specific standards to various DOE facilities. One recommendation was that DOE identify the specific standards (including those referenced in all applicable Department orders, regulations and requirements) which it considers apply to the design, construction, operation and decommissioning of the following facilities:

- a. Savannah River, K, L and P reactors (DP)
- b. Rocky Flats buildings, 371, 374, 559, 707, 771, 774, 776, 777 and 779 (DP)
- c. Plutonium Finishing Plant (DP), Purex Facility (DP) (DP and associated waste processing and storage facilities (EM)), N-Reactor (DP) and K Reactor storage basins (DP)
- d. Waste Isolation Pilot Plant (EM)

In order to respond to this recommendation DOE needs to do a comprehensive review of facility documentation on an urgent basis. Accordingly, you are directed to initiate the following efforts:

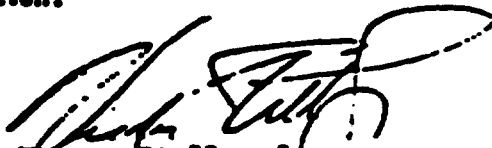
- Collect documentation for the above named facilities under your cognizance that contain references to specific design, construction, operation or decommissioning standards. The term standards should be interpreted broadly to include not only orders, including field office or contractor implementation orders but also industry (ASME, IEEE), commercial (uniform building code) or any other requirements referenced in the available DOE facility documentation.
- Review this documentation and identify specific standards referenced.
- Provide a listing of the specific standards identified and a copy of the documentation which reference them.
- Appoint a technical point of contact within your office for this effort and assign additional personnel as required.

The name of this individual should be provided as soon as possible, to Jim Knight, ONM-HQ, for DP facilities, or Mark M. Frei, EM-34, for EM facilities. This action applies not only for points of contact for the above named facilities, but for all similar major facilities as we should be addressing these questions on a complex-wide basis, giving initial focus to named facilities.

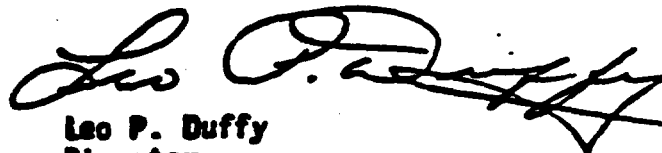
This effort may require initiating contract efforts to collect and review this documentation.

This effort should be initiated immediately and a plan should be provided by May 1, 1990. It is important that you adhere to this schedule since DOE is required by law to respond to the Board's recommendations within a fixed time frame.

For additional information on this request, please contact Jim Knight in the Office of Nuclear Materials Production.



Victor Stello, Jr.  
Principal Deputy  
Assistant Secretary  
for Defense Programs



Leo P. Duffy  
Director  
Office of Environmental Restoration  
and Waste Management

cc:  
Manager, OR  
Manager, ID ✓  
Manager, SAN  
Manager, NY  
Manager, CH