

**[DOE LETTERHEAD]**

July 24, 1990

The Honorable John T. Conway  
Chairman  
Defense Nuclear Facilities Safety Board  
Suite 675  
600 E Street, NW  
Washington, DC 20004

Dear Chairman Conway:

In response to your letter of June 5, 1990, I accept your recommendation 90-6 regarding criticality safety at the Rocky Flats Plant. The Board requested that the Department prepare a written program to address accumulation of materials in the ventilation ducts and related systems at the Rocky Flats Plant.

I have established the following policy on this issue:

1. All lines of ductwork containing more than 400 grams of plutonium shall be cleaned to remove the material to the maximum extent practicable but in no case to leave a residue exceeding 400 grams in any one system of ducts. This will physically rule out the possibility of a criticality in even the most unlikely series of events.
2. The contractor shall develop and implement an Operational Safety Requirement (OSR) which includes a limiting condition for operation, a corresponding surveillance requirement, and a remedial action directive to assure that future operations do not lead to the accumulation of more than 400 grams of plutonium in any one system of ducts. The OSR must be submitted to and approved by DOE prior to resumption of operations.
3. If the contractor determines that the risks to workers during removal of material from ductwork exceeds the risks of continued operation with the material in the duct, the contractor must submit an analysis of the respective risks along with justification for continued operation of the process lines contributing material to the affected ductwork. If it is not possible to remove the material for other valid reasons, the contractor shall also submit an analysis justifying continued operation of the affected process line. The Secretary shall determine, on a case-by-case basis, if continued operation is warranted.

The Department has directed EG&G Rocky Flats to prepare an action plan to implement the above policy. Implementation must ensure that the possibility of a criticality event is controlled in accordance with DOE requirements and that the presence of fissile and other materials will not result in undue risk to the health and safety of the public or site personnel. The Department has further directed that this action plan respond to the specific points contained in your letter. EG&G expects the plan to be available on or about September 1, 1990, and I will provide a copy

to you when it is received.

Sincerely,

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