

[DNFSB LETTERHEAD]

January 23, 1996

The Honorable Thomas P. Grumbly
Assistant Secretary for Environmental Management
Department of Energy
Washington, DC 20585

Dear Mr. Grumbly:

Your letter dated December 7, 1995, forwarded a *Facility Utilization Strategy for the Savannah River Site Chemical Separation Facilities*, which would consolidate nuclear material stabilization in the site's F-Area and eventually place H-Canyon in "de-inventoried standby." Based on the information provided, this strategy would have minimal impact on material stabilization activities associated with Recommendation 94-1. However, the facility utilization strategy does not provide sufficient definition of the proposed "de-inventoried standby condition" for H-Canyon. It is not clear that the plan will satisfy Recommendation 94-1 with regard to maintaining necessary facilities (H-Canyon) in a usable state. While the Department's proposal to suspend restart of the H-Canyon at this point is not inconsistent with the stabilization of Recommendation 94-1 materials, the plan does not specifically address retaining H-Canyon in a usable state, as suggested in the Defense Nuclear Facilities Safety Board's (Board) letter dated November 15, 1995.

In a meeting with members of your staff on January 19, 1995, additional information was provided that included a specific commitment to maintain H-Canyon in its current state of physical readiness until future mission decisions are made. The Board understands that completion of existing initiatives to upgrade safety systems and authorization basis implementation is part of the current plan. In addition, the plan should include:

- A plan for maintaining the safety systems and programs identified in the facility's authorization basis in the transition to "de-inventoried standby," which is projected for 2001 or 2002.
- Necessary maintenance of process equipment to ensure future operability.
- Preventive maintenance plan for all equipment.
- Continued training and qualification programs for operators to be used at H-Canyon.
- Definition of the time required to restart H-Canyon processing from standby.

The Board considers definition of the future operational status of H-Canyon to be part of the implementation of Recommendation 94-1. Since the proposed canyon utilization strategy represents a change to the Recommendation 94-1 Implementation Plan, this needs to be formally presented to the Board for review. The Board's staff is reviewing these matters and is available to discuss plans to maintain the appropriate level of H-Canyon operability if you proceed with implementation of your proposed consolidation strategy.

Please submit a report within 90 days of receipt of this letter that describes the Department of Energy's plan to define the future status of H-Canyon.

Sincerely,

John T. Conway
Chairman

c: Mr. Mark Whitaker