



Department of Energy
Washington, DC 20585

December 7, 2000

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

Dear Mr. Chairman:

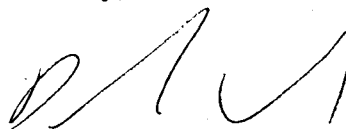
In your June 14, 2000, letter to the Secretary you invited comments by the Department of Energy (DOE) on the Defense Nuclear Facilities Safety Board (DNFSB) Technical Report, entitled "Fire Protection at Defense Nuclear Facilities" (DNFSB/Tech 27). DOE technical reviewers met with your staff to discuss Tech 27 on September 6, 2000. This meeting was an initial meeting with the Board staff and served to discuss each topic to make sure that we fully understood the issues and to present our initial thoughts. The Department also received your September 26, 2000, letter which asked us to coordinate Board Recommendation 2000-2 planning efforts with the Secretary's initiative to conduct a comprehensive study of fire safety and the topics of Tech 27. Accordingly, we coordinated the responses necessary for Tech 27 with the implementation commitments necessary for Recommendation 2000-2 as they pertain to fire safety systems.

The Department's recently issued Implementation Plan (IP) for 2000-2 has folded all relevant and common issues in Tech 27 in the 2000-2 commitments. Specifically, the Implementation Plan section 4.2 addresses the personnel expertise, configuration management, performance assessment, and inspection aspects. The safety systems classification and defense in-depth issues of Tech 27 are also dealt with in the Phase I assessments and the comprehensive study defined in sections 4.1.1 and 4.1.3 of the IP.

Tech Report 27 raised two additional fire safety issues which are not directly addressed in the 2000-2 IP. These two issues are: (1) the need for integrating safety analysis, fire hazard analysis, emergency planning analysis, and criticality safety evaluations, and (2) the use of the Work Smart Standards approach in establishing an appropriate set of fire protection requirements. Both of these issues are very important and will be addressed separately from the IP

by DOE through the Department-wide team led by Rich Stark of the Office of Nuclear and Facility Safety Policy. This team will present a DOE proposal for these two Tech 27 issues in the upcoming weeks after coordination with your staff.

Sincerely,

A handwritten signature in black ink, appearing to read 'D. Michaels', written in a cursive style.

David Michaels, PhD, MPH
Assistant Secretary
Environment, Safety and Health

cc:

✓ M. Whitaker, S-3.1