



Department of Energy
National Nuclear Security Administration
Washington, DC 20585

November 24, 2003

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

Dear Mr. Chairman:

The National Nuclear Security Administration (NNSA) is committed to meeting the commitments and protocols concerning High Efficiency Particulate Air (HEPA) filter identified in the Department's letter of June 4, 2001. On January 9, 2003, you requested a status of efforts to meet commitments made by the Department in its June 2001 letter. The Department responded on July 11, 2003, and provided additional NNSA information on October 17, 2003.

NNSA expects that its line management will ensure that those systems relied upon to fulfill an intended safety function are maintained and tested to carry out these functions. To this end, line managers are also responsible for implementing Department requirements for HEPA filters, including the conduct of testing and self-assessment. In our assessment of the status of the HEPA filter programs at the NNSA sites, we have noted that assessment activities covering our site's required HEPA filter programs were not as rigorous or well defined as expected. In Secretary Abraham's July 11, 2003, letter, he committed that NNSA would "take the necessary action to improve and strengthen these programs where needed." We have taken steps to meet this commitment by requiring all sites to ensure lasting programs are in place to meet these commitments. The institutionalization of HEPA filter testing commitments will be part of our contractors' scheduled assessments of 'vital safety systems' under Defense Nuclear Facilities Safety Board Recommendation 2000-2, "Configuration Management, Vital Safety Systems." We are explicitly requiring that our contractors ensure that 100% testing of filters per applicable DOE/NNSA commitments has been achieved as part of their vital safety systems assessments. Additionally, we have requested that our sites prepare a formal response to document the steps taken to routinely verify that the applicable HEPA filter testing requirements are being met.



If you have any further questions, please contact me or have your staff contact Xavier Ascanio of my staff at 301-903-3757.

Sincerely,

A handwritten signature in black ink, appearing to read "Everet H. Beckner". The signature is fluid and cursive, with the first name being the most prominent.

Everet H. Beckner
Deputy Administrator
for Defense Programs

Enclosure

cc w/enclosure:
M. Whitaker, DR-1



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National Nuclear Security Administration
Washington, DC 20585
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MEMORANDUM FOR MANAGER, SANDIA SITE OFFICE
MANAGER, KANSAS CITY SITE OFFICE
MANAGER, PANTEX SITE OFFICE
MANAGER, LIVERMORE SITE OFFICE
MANAGER, NEVADA SITE OFFICE
MANAGER, Y-12 SITE OFFICE
MANAGER, SAVANNAH RIVER SITE OFFICE
MANAGER, LOS ALAMOS SITE OFFICE

FROM:

Everet H. Beckner
Deputy Administrator
for Defense Programs

SUBJECT:

ACTION: REQUEST FOR ASSURANCE OF CONTINUED
TESTING OF HIGH EFFICIENCY PARTICULATE AIR
FILTERS AT NATIONAL NUCLEAR SECURITY
ADMINISTRATION SITES

By memorandum dated April 4, 2001, the Department of Energy (DOE) committed to put in place protocols and procedures that were intended to ensure an appropriate level of Quality Assurance (QA) in the design, integrity, and performance of new/replacement High Efficiency Particulate Air (HEPA) filters used at defense nuclear facilities.

All National Nuclear Security Administration (NNSA) sites have previously responded with information of the current status of the programs demonstrating, where applicable, their commitment for compliance with the following:

- (1) Conduct 100% QA testing at the DOE Filter Test Facility (FTF) of new HEPA filters that are used in confinement ventilation systems for Category 1 and Category 2 nuclear facilities that perform a safety function in accident conditions or are designated as important to safety (i.e., safety class or safety significant equipment per DOE-STD-3009-94).
- 2) Conduct 100 % QA testing at the FTF of HEPA filters necessary for habitability systems, e.g., filters that protect workers who must not evacuate in emergency situations because of the necessity to shut down or control the situation, including those determined to be necessary for habitability of Emergency Operation Centers, etc.



- (3) For all other applications where HEPA filters are used in confinement ventilation systems for radioactive airborne particulates, develop and document an independent, tailored filter QA testing program that achieves a high degree of fitness for service. The program should include the testing of a sample of filters at the FTF.

We note that all NNSA sites have institutionalized the assessment of safety systems as part of Defense Nuclear Facilities Safety Board Recommendation 2000-2, "Configuration Management, Vital Safety Systems." As you complete future safety systems assessments for those safety systems designated as safety class/safety significant having HEPA filter systems, you should explicitly ensure that 100% testing of filters per DOE/NNSA commitments has been achieved. This may require that the mechanisms you have put in place to implement these assessments be updated to add filter testing verification. Where your sites have identified HEPA filter systems being required to meet 'habitability systems' requirements (Item 2), we request you develop plans to address the 100% testing assurance of these systems.

Additionally, we request that you prepare and submit a formal response documenting those actions taken to formally implement all applicable HEPA filter testing commitments identified in Items 1-3.

We request your response by January 9, 2004. If you have any questions, please contact Xavier Ascanio at 301-903-3757.