



Department of Energy
National Nuclear Security Administration
Washington, DC 20585



August 19, 2008

The Honorable A. J. Eggenberger
Chairman
Defense Nuclear Facilities Safety Board
625 Indiana Avenue, N.W., Suite 700
Washington, D.C. 20004-2901

Dear Mr. Chairman:

On July 12, 2006, Secretary **Bodman** submitted the Department's revised Implementation Plan (IP) for Defense Nuclear Facilities Safety Board Recommendation 2004-2, *Active Confinement Systems*. Deliverable 8.6.3 of the IP consists of facility-specific confinement ventilation system evaluations performed by the Site Offices in accordance with the Department's Ventilation System Evaluation Guidance. Deliverable 8.6.5 consists of Program Secretarial Office concurrence and approval of the disposition of gaps and upgrades. This letter and its enclosure comprise Deliverables 8.6.3 and 8.6.5 for the following facilities at the **Pantex** Site: 12-44 Cell 8; 12-116; 12-86; and 12-64.

In accordance with the IP and National Nuclear Security Administration (NNSA) guidance provided to the Sites in our December 6, 2006, memorandum, the Department of Energy Independent Review Panel (IRP) of Confinement Ventilation System (CVS) experts and the NNSA Chief of Defense Nuclear Safety (CDNS) have performed separate reviews of the evaluation and its conclusions.

The ventilation systems for these facilities were designed to provide dust-free temperature controlled environments in which to work; they do not perform confinement safety functions, are not credited in the associated Documented Safety Analyses for any accident preventive or mitigative functions, and are not classified as safety systems, structures, and components. The hazards in these facilities are controlled through a combination of preventive and mitigative controls including safety class fire suppression systems; the facility structure; material storage in approved containers designed to withstand the effects of credible accidents; and, specific administrative controls on material at risk and combustible loading. Active confinement systems are not relied upon or designed into the facilities. The evaluation identified possible system enhancements, but concluded that because the CVS is not credited or designed to mitigate accidents, the enhancements were not cost beneficial and will not be implemented.

The CVS evaluation reports for the **Pantex** facilities listed above and the associated IRP reports for these facilities are enclosed. The NNSA CDNS concluded that the evaluation and its results are technically sound and appropriate, and meet the intent of the IP. The IRP review of the initial evaluations concluded that they were performed in accordance



with the Ventilation System Evaluation Guidance except for the cost benefit analysis, which has since been revised to reflect the **cost/benefit** process used by the Site Evaluation Team. Our review concurs with the conclusions reached by the Site, IRP, and CDNS.

If you have any questions concerning this letter or its enclosure, please contact me or have your staff contact Rick Kendall by phone at 301-90313102 or by e-mail at Rick.Kendall@nnsa.doe.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert L. Smolen". The signature is written in a cursive, flowing style with a large initial "R".

Robert L. Smolen
Deputy Administrator
for Defense Programs

Enclosure

cc: w/enclosure

B. Ostendorff, NA-2
M. Whitaker, HS-1.1
D. Nichols, NA-2.1
T. Sherry, YSO
J. McConnell, NA-171