

[DNFSB LETTERHEAD]

May 1, 1992

The Honorable James D. Watkins
Secretary of Energy
Washington, D.C. 20585

Dear Mr. Secretary:

The Board has received and analyzed your letter dated April 3, 1992, which presents the Department's view on the status of several Board Recommendations which have been answered and fully implemented in DOE's view. As you correctly noted in your letter, Recommendation 91-3, concerning operational readiness at the Waste Isolation Pilot Plant (WIPP), and Recommendation 91-4, concerning operational readiness at Rocky Flats' Building 559, have been fully implemented. Therefore, Recommendations 91-3 and 91-4 are closed. The Board will, of course, continue to monitor activities at both those facilities pursuant to its oversight responsibilities.

Your letter also correctly states that Recommendation 90-3 regarding the Hanford tanks was expanded and superseded by Recommendation 90-7 when the Board determined that the pace of sampling and other safety activities needed to be accelerated. Therefore, Recommendation 90-3 is also closed, having been superseded by 90-7. The Board will continue to follow DOE's progress in implementing Recommendation 90-7.

Your letter also correctly notes that DOE's response accepting Recommendation 91-5, regarding the power level of K-Reactor operations, is sufficient and that DOE preparation of an implementation plan, conduct of studies, and submittal of reports are all contingent upon a DOE decision to exceed 30 percent power, a decision which has not been made. However, under these circumstances the Board does not view the Recommendation as "closed".

Recommendation 90-4, Operational Readiness Reviews (ORR) at Rocky Flats, was incorrectly included in the list of Recommendations that DOE views as fully implemented. DOE's implementation plan for Recommendation 90-4 calls for a building-by-building preparation of ORRs as buildings are prepared to resume plutonium operations. Building 707 is currently being reviewed for operational readiness, and the Board's recommendation and DOE's implementation plan remain in effect for that building, and all others at Rocky Flats that may be proposed for resumption of operation.

Finally, although Recommendation 90-1 was entitled "Operator Training at Savannah River Facilities Prior to Restart of K-Reactor," DOE's Implementation Plan called for further upgrades in training and qualification of K-Reactor personnel after restart. Therefore, the Board will continue to review the progress made to achieve those improvements called for in the Implementation Plan.

The Board hopes that this letter will clarify its position so that there is no misunderstanding between the Board and DOE regarding further actions necessary pursuant to Board Recommendations which you have accepted on behalf of DOE.

Sincerely,

John T. Conway
Chairman