## [DOE LETTERHEAD]

April 12, 1995

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

Dear Mr. Chairman:

This letter provides you with the process the Department of Energy will use to implement Recommendation 94-3, Rocky Flats Seismic and Systems Safety.

The Implementation Plan will describe efforts over the next six months to assess the seismic capability of Building 371. The objective of this effort is to determine whether the structure and systems for the planned mission of Building 371 are seismically robust enough to justify going forward with a detailed evaluation. This objective will be accomplished by using simplified seismic models to determine the gross structural response and identify weak links in terms of first evaluating the building with respect to its current condition and, second, in terms of structural modifications which increase the seismic capacity.

Once this effort is completed, a determination will be made whether necessary seismic modifications are appropriate and feasible. This determination will consider other alternative solutions which may include a new facility, more robust packaging, or less dispersible material form to provide a more appropriate interim storage solution than Building 371 alone. This approach will allow the Department to select the most appropriate option for storage of special nuclear material.

The implementation plan will consider each of the items described in Recommendation 94-3 and will include the following 12 tasks:

- 1. Define Building Layout and Structural Loading;
- 2. Identify Safety Systems and Functional Requirements;
- 3. Study of Site Storage Alternatives;
- 4. Define Seismic Ground Motion;
- 5. Establish Structural Evaluation Team:
- 6. Review of Existing Structural Documentation;
- 7. Evaluate Structural Capacity;
- 8. Evaluate Structures, Systems, and Components for NPH;
- 9. Assess Configuration and Performance of Structures, Systems, and Components;
- 10. Provide Recommendations and Bases for Interim SNM Management;
- 11. Determine Course of Action for Interim SNM Management; and
- 12. Develop Integrated Program Plan.

The Implementation Plan, which is the basis of ongoing discussion between our staffs, will

be provided to the Board by April 24, 1995. We are also continuing to develop the Integrated Program Plan which will form the basis for any detailed evaluation of Building 371.

If you have any questions, please contact me at 202-586-7710.

Sincerely,

Thomas P. Grumbly
Assistant Secretary for Environmental Management