

**[DNFSB LETTERHEAD]**

September 20, 1996

The Honorable Thomas P. Grumbly  
Under Secretary of Energy  
1000 Independence Avenue, SW  
Washington, DC 20585-1000

Dear Mr. Grumbly:

The Defense Nuclear Facilities Safety Board (Board) reviewed the Department of Energy's (DOE) Integrated Program Plan for Board Recommendation 94-3 submitted on July 11, 1996. The Board believes this program plan provides an adequate basis for addressing the seismic aspects of the structure of buildings planned for use to store plutonium safely at the Rocky Flats Environmental Technology Site (RFETS).

It is noted that the development of this program plan and steps already taken were accomplished in a cooperative manner and with a shared desire to ensure safe storage of plutonium at the site. The Board and the Board's staff will continue to work with DOE and the RFETS to ensure that the efforts delineated in the program plan are completed in a mutually satisfactory manner.

The Board accepts this program plan subject to the clarifications noted in the enclosure. The Board understands that one of the first commitments in the program plan to implement an updated authorization basis may not be completed as scheduled. To ensure that adequate progress is made toward commitments in the program plan, both DOE and the contractor must provide leadership for completion of the program plan.

Sincerely,

*John T. Conway*  
Chairman

c:  
The Honorable Alvin L. Alm  
Mr. Mark B. Whitaker, Jr.  
Ms. Jesse Roberson

Enclosure

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**Enclosure**

**Clarifications and Comments on the Integrated Program Plan, Revision G**

1. The Integrated Program Plan (IPP) notes that a consensus design basis earthquake will

be established for the new Interim Storage Vault (ISV). The Board will review and analyze the process used in determining the design basis earthquake.

2. The IPP indicates that an updated deterministic ground motion assessment will be used in the development of the consensus design basis earthquake for the ISV. It should be clarified that the ground motion and geologic study will be performed consistent with the intent of 10 CFR 100, Appendix A.
3. The IPP delineates a general process for identification of safety systems for Building 371. The Board will review and analyze the final selection of safety systems, as well as the preparation and implementation of controls for the safety systems identified in the authorization basis.
4. In performing the structural analysis of record for Building 371, certain building live loads, commodity loads, and the effects of drainage of water from under the building were assumed. The authorization basis for the building should provide adequate controls to ensure that the bases for these assumed conditions are maintained.