

## Washington, DC 20585

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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 responds to your letter of October 15, 1997, on behalf of the Secretary of Energy. Your letter made specific suggestions about our implementation of Recommendation 94-3 regarding seismic safety for Rocky Flats Building 371.

The Department will formally revise and transmit the Integrated Program Plan (IPP) for this recommendation within 60 days of this letter. Our refocus at Rocky Flats upon accelerated site closure has changed the storage expectations upon which the original IPP was based. Substantial amounts of material have already been shipped. Several material forms of concern have been stabilized to reduce risk per your Recommendation 94-1 on fissile material stabilization. Meanwhile, we continue to implement safety basis upgrades required by the revised safety Authorization Basis (AB), and priority upgrades per the IPP in Building 371. We have also directed a review of the selection of safety class systems and components and the related controls associated with the scenarios addressed in your letter.

As stated in the current IPP, the Department is committed to prepare Building 371 for safe interim storage of the site's plutonium metal and oxide or provide an acceptable alternative by 2002. This is one of the objectives of Goal 2 in the IPP. and the Department views these Goals as the IPP policy statements. Important factors affecting implementation of these goals have changed, however, as indicated above. Important changes include emergence of options for accelerated off-site shipment of Rocky Flats material, shipments underway to Pantex, suspension of work on the Interim Storage Vault, and insights from the recently completed safety AB. To illustrate the impact of these changes, note that planned completion of pit shipments to Pantex by September 1999 will simplify the preparation of Building 371 for an interim storage mission, should delays in nonpit off-site shipment require this contingency. An updated plan to ensure Building 371 is ready for interim storage if necessary is now being developed through application of systems engineering, and this update will be included in the revised IPP. As part of this updated plan, a methodology will be provided for validation of the safety margin upgrades in light of the insights gained from the



AB development. This validation will be completed in fiscal year 1998 to ensure that the safety margin upgrades are properly scoped and that engineering of the upgrades can then proceed.

The revised IPP will reflect our preferred plan to accelerate shipment of the fissile material from the Rocky Flats site. We are available to provide further details on the approach for accelerating shipments of nuclear materials from Rocky Flats and the necessary National Environmental Policy Act documents required. This could be accomplished during the Board's visit to Rocky Flats in December, or earlier if desired. Thank you for the timeliness of your suggestions for our ongoing planning updates.

Sincerely,

Alm Alvin L. Alm

Assistant Secretary for Environmental Management

cc: Mark Whitaker, S-3.1