The Honorable A. J. Eggenberger  
Chairman  
Defense Nuclear Facilities Safety Board  
625 Indiana Avenue, NW, Suite 700  
Washington, DC 20004-2901  

Dear Mr. Chairman:  


As identified in your letter, the Department has general design requirements for safety systems. We agree with the Board that safety systems for each project can be evaluated individually, but that it would be beneficial to establish guidance on translating requirements into specific fire protection design and operating features for more frequently used fire protection systems. As acknowledged, it may not always be necessary to meet criteria for redundancy, nuclear-grade quality assurance, or seismic qualification. As suggested in Recommendation 2008-1, our implementation will leave room for engineering judgment and innovative approaches in such cases. As discussed in this letter, we accept the Board’s recommendation and will respond by developing an Implementation Plan that:  

- Identifies additional design and operational criteria for newly classified (but not existing) safety-class and safety-significant fire protection systems where warranted;  

- Revises DOE Standard-1066-99, *Fire Protection Design Criteria*, to provide additional guidance for design and operation of selected fire protection systems designated as safety-class or safety-significant by the relevant Documented Safety Analysis. This guidance will include the appropriate level of detail that considers the uniqueness of fire scenarios;  

- Identifies Nuclear Regulatory Commission and commercial design codes and standards that could be applied to safety-class and safety significant fire protection systems; and

We will interact with the Board and Board staff as we develop our Implementation Plan. I have assigned Mr. Andrew C. Lawrence, Director, Office of Nuclear Safety and Environment, Office of Health, Safety and Security, to be the Department’s responsible manager for developing the Implementation Plan. He can be reached at (202) 586-5680.

Sincerely,

Samuel W. Bodman