



Department of Energy  
National Nuclear Security Administration  
Washington, DC 20585



June 2, 2008

The Honorable A. J. Eggenberger  
Chairman  
Defense Nuclear Facilities Safety Board  
625 Indiana Ave., N.W., Suite 700  
Washington, D.C. 20004-2901

Dear Mr. Chairman:

On December 29, 2005, the Department of Energy (DOE) transmitted Exclusion Reports for National Nuclear Security Administration (NNSA) and Office of Environmental Management (EM) facilities in accordance with Commitment 8.3 of the Implementation Plan (IP) for Defense Nuclear Facilities Safety Board (DNFSB) Recommendation 2004-2, *Active Confinement Systems*. Commitment 8.3 required a list of, and justification for, defense nuclear facilities that will be excluded from further review of confinement systems under the IP. The Exclusion Reports were developed in accordance with the guidance and criteria contained in the deliverable for Commitment 8.2, *Exclusion Reporting Process*, which was submitted to the DNFSB on October 31, 2005. The Exclusion Reports for NNSA facilities were prepared at the sites and were reviewed and approved by NNSA line management and the Central Technical Authority (CTA).

On August 7, 2006, NNSA provided to the DNFSB a list of 26 facilities that will complete a Safety-Related Ventilation System Evaluation as deliverable 8.6.1 of the IP. The NNSA has subsequently identified one additional facility (the Waste Solidification Building at the Savannah River Site) for which a ventilation system evaluation will be performed and has identified six facilities on the list of 26 previously provided for which Exclusion Reports are now considered appropriate. Accordingly, NNSA has prepared the enclosed additional Exclusion Reports to be included with those provided in response to Commitment 8.3. These reports were also developed in accordance with the approved 2004-2 exclusion reporting process and have been signed by the respective NNSA Site Office, CTA, and the Program Secretarial Office as required.

If you have any questions, please contact me or have your staff contact Rick Kendall at (301) 903-3102.

Sincerely,

Robert L. Smolen  
Deputy Administrator  
for Defense Programs



## Enclosure

cc: W. Ostendorff, NA-2  
J. Talbot, NA-17  
M. Whitaker, HS-1.1  
B. Bruns, HS-1.1  
J. O'Brien, HS-22  
D. Winchell, LASO  
C. Yuan-Soo Hoo, LSO  
T. Sherry, YSO

---

U.S. Department of Energy  
National Nuclear Security Administration

---

*Exclusion Reports: Commitment 8.3 of the Implementation Plan for  
Defense Nuclear Facilities Safety Board Recommendation 2004-2  
Active Confinement Systems*

*Addendum to the December 2005 Listing of NNSA Facilities  
Excluded From Further Review Under Recommendation 2004-2*



March 2008

---

c

Las Alamos National Laboratory- Updated Exclusion Report					
Facility/Segment /Section	Hazard Category	Description	Exclusion Criteria	Comments/Justification	
WCRRF	HC2	Repackaging TRU waste for shipment to WIPP	NB-5	Recently upgraded to HC2 from HC3 to process High Activity Level Drums. Limited life facility with expected operations through 2012	
DVRS	< HC3	Volume reduction of large low level waste for shipment and disposal	N/A	Facility downgraded to < HC3 – never operated as a HC 2 nuclear facility. Therefore, recommendation 2004-2 requirements are no longer applicable.	
LANSE 1L Target	Accelerator	Experimental applications	N/A	LANSE 1L Target not a nuclear facility subject to 10 CFR 830 requirements per recent CG interpretation. Therefore, recommendation 2004-2 requirements are no longer applicable.	
RLWTF	Per LASO direction received on February 8, 2008, a ventilation system evaluation will be performed for RLWTF and the Exclusion Report has been withdrawn.				
WMRM	HC2	Waste Management Risk Mitigation – part of Cerro Grande restoration emergency line item project.	CE-8	Project 70% completed – current plan is to complete construction with only emergency influent storage capability. PDSA and SER complete with no active ventilation for the tanks. Meets CE-8 criterion.	
Submitted By: <i>[Signature]</i> LASO 10/15/07			Approved By: <i>[Signature]</i> LASO 10/18/07		
Signature	Organization	Date	Signature	Organization	Date
PSC Concurrence: <i>[Signature]</i> NE-10 4/29/08			CTA Concurrence: <i>[Signature]</i> NA-2 5/30/08		
Signature	Organization	Date	Signature	Organization	Date

**Lawrence Livermore National Laboratory**

Facility	Description and System Classification	Current Status	Comments
B612	<p>There is no active ventilation system for B612. The Size Reduction Unit (SRU) located in Room 100 has a dedicated HEPA filter. The SRU is used for handling LLW, mixed LLW, and hazardous waste. No TRU may be handled within the SRU with the exception of drum lid replacements for LLW to TRU waste conversions as stipulated in the TSR.</p> <p>B612 is part of the Waste Storage Facilities DSA.</p>	Active Facility	TSR limits B612 inventory to less than 56 PE Ci. Footprint Reduction effort is planned to reduce building categorization to radiological in next DSA annual update cycle.

**Submitted By:**

**Approved By:**

*[Signature]*  
 Signature      TECHNICAL SERVICES      Organization      9/13/07      Date

*[Signature]*      AMES      Organization      9-13-2007      Date

**PSQ Concurrence**

**CTA Concurrence**

*[Signature]*      NA-10      Organization      4/29/08      Date

*[Signature]*      NA-2      Organization      5/30/08      Date

## NNSA DNFSB RECOMMENDATION 2004-2 CHANGE REQUEST REPORT

Y-12 SITE				
Facility Segment/Section	Hazard Category	Description	Change Requested	Comments Justification
Building 9995	HC2	Analytical chemistry laboratory. Small quantities of enriched uranium. Gloveboxes have active ventilation systems that provide a motive force that applies a negative pressure differential between areas of lower contamination to areas of higher contamination. Hoods have active ventilation systems that provide a motive force to maintain a minimum air flow across the hood face to ensure air flow if from areas of lower contamination to areas of higher contamination.	Per 3/6/2007 supplemental guidance #6, should be treated as HC3 for 2004-2 purposes.	Facility is classified as hazard category 2 based solely on the potential for a nuclear criticality accident.  No ventilation system evaluation report is required for HC3 facilities with active confinement ventilation systems. While Building 9995 does not have a full facility ventilation system, the gloveboxes and hoods where enriched uranium is handled do have active ventilation systems.
Submitted By: <i>Aura Polvine</i> Y-12 Site office 8/29/07 Signature Organization Date			Approved By: <i>JDS</i> YSO 3/17/08 Signature Organization Date	
PSO Concurrence: <i>[Signature]</i> NA-10 4/29/08 Signature Organization Date			CTA Concurrence: <i>[Signature]</i> NA-2 5/20/08 Signature Organization Date	