

Department of Energy

Washington, DC 20585 July 25, 2011

The Honorable Peter S. Winokur Chairman Defense Nuclear Facilities Safety Board 625 Indiana Avenue, NW, Suite 700 Washington, DC 20004-2901

Dear Mr. Chairman:

In a letter dated, February 25, 2011, the Department of Energy (DOE) informed the Defense Nuclear Facilities Safety Board that the Documented Safety Analysis (DSA) for the Tank Farms at Hanford would be updated by the end of June 2011. This update was to include, among other things, designation of the double shell tank (DST) ventilation system as safety significant. The update is now projected for September 2011 due to a better understanding of the scope and complexity of the changes needed.

During development of the Functions and Requirements Evaluation Document (FRED) for the safety-significant DST primary tank ventilation system, several unanticipated issues were identified based on the differences between the ventilation systems in the various tank farms. The AN and AW farms have newer ventilation systems and share a common design. However, the AP, AY/AZ, and SY tank farm ventilation systems have different designs; furthermore, the two trains in the SY system are different. That is, there are five different designs requiring separate evaluations. These differences have greatly expanded and complicated the effort required to create the FRED as well as the subsequent DSA amendment.

We still intend to have DOE Headquarters review changes to the DSA to verify the classification of the ventilation system and the completion of other changes that are needed to strengthen the DSA (e.g. improvements to specific administrative controls).

As the Office of River Protection (ORP) committed in its February 10, 2011, letter to the Technical Director, it directed the contractor to include additional requirements to bolster the existing defense-in-depth classification. These additional requirements entailed: 1) requiring ORP approval prior to any planned shutdown of the DST ventilation system; and 2) requiring contractor notification to ORP within 8 hours of any unplanned interruption of DST ventilation that lasts longer than 1 hour, and providing proposed recovery actions within 24 hours to restore ventilation. These requirements have been included in Table 3.3.2.3.2-2 (Item 1. DST Primary Tank Ventilation Systems) of the Tank Farms DSA.

If you have any further questions, please contact me or Mr. James Hutton, Acting Deputy Assistant Secretary for Safety and Security, at (202) 586-5151.

Sincerely,

David Huizenga

Acting Assistant Secretary for Environmental Management

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