



The Secretary of Energy

Washington, DC 20585

August 29, 2014

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

Dear Mr. Chairman:

On June 6, 2013, the Department of Energy (DOE) provided the Defense Nuclear Facilities Safety Board (Board) an Implementation Plan (IP) for Board Recommendation 2012-2, *Hanford Tank Farms Flammable Gas Safety Strategy*, and took a pragmatic and graded approach to address the IP sub-recommendations to improve the flammable gas controls. Progress has been made by the Department toward completion of actions identified in the IP, and DOE recently briefed the Board's staff on the status of IP deliverable dates. Enclosed is a summary of the changes in the expected delivery dates for certain deliverables contained in the DOE's IP.

These changes reflect modifications only to the estimated completion dates of deliverables in the IP and do not change the IP actions themselves. This revised schedule is necessary due to unexpected budgetary and operational impacts. In particular, sequestration and the continuing resolution for a portion of fiscal year 2014 significantly impacted funding for the underlying actions related to these deliverables and the contractor's ability to achieve the associated dates.

We understand the advantages that having the defense-in-depth that the real-time ventilation exhaust flow monitoring would provide. We are exploring ways to accelerate the delayed schedule. In the meantime, we are aware of the safety risks and will continue to manage those risks.

We appreciate the advice and feedback provided by the Board. If you have any questions, please contact Mr. Kevin Smith, Site Manager, Office of River Protection, at (509) 372-2315.

Sincerely,

A handwritten signature in black ink, appearing to read "Ernest J. Moniz".

Ernest J. Moniz

Enclosure



Recommendation 2012-2 Implementation Plan (IP) Deliverables with Revised Dates

Action 1-2: Develop a streamlined approach to implementing the planned improvements for upgrading the double-shell tank (DST) primary tank ventilation systems to meet safety significant (SS) requirements.

Deliverable: A report describing the executable strategy, cost, and schedule for upgrading each DST primary tank ventilation system to meet SS requirements. This process will be documented and will include an evaluation of the approach described above, including the simplified back-up power system and architecture. (Original IP expected delivery date: June 2014).

New Expected delivery date: September 2014

Action 1-3: Develop a feasibility study for inspecting the condition and integrity of DST primary tank ventilation ductwork between the tank and flow monitoring locations. (During initial discussions between the U.S. Department of Energy, Office of River Protection and the Defense Nuclear Facilities Safety Board, a milestone date for this activity was not established. The development of the feasibility study is based upon the streamlined approach within Action 1-2).

Deliverable: The feasibility study for inspecting the condition and integrity of DST primary tank ventilation ductwork that will be upgraded to meet SS requirements. (Original IP expected delivery date was determined as part of Action 1-2).

New Expected delivery date: September 2014

Action 2-2: Install SS instrumentation for real-time monitoring of the ventilation exhaust flow from each DST.

Deliverable: A letter to the Board reporting the completion of the installation of flow measuring instrumentation. (Original IP expected delivery date: October 2015)

New Expected delivery date: October 2016

Action 2-3: Approve the safety basis amendment revising the flammable gas controls to use SS real-time flow monitoring instrumentation.

Deliverable: A copy of the safety evaluation report approving the safety basis amendment revising the flammable gas controls to use SS real-time flow monitoring. (Original IP expected delivery date: October 2015).

Expected delivery date: October 2016

Action 2-4: Implement a safety basis amendment revising the flammable gas controls to use SS real-time monitoring.

Deliverable: A letter to the Board forwarding the notice of implementation. (Original IP expected delivery date: December 2015).

New Expected delivery date: January 2017

Action 3-1: Upgrade the four double-contained receiver tank level indicators and the 84 (three for each of the 28 DSTs) annulus level indicators that are used to fulfill safety functions to SS.

Deliverable: A letter to the Board reporting upgrade is complete. (Original IP expected delivery date: January 2015).

New Expected delivery date: July 2016

Action 5-1: Evaluate potential means to reduce the inventory of retained flammable gases in DSTs in a controlled manner.

Deliverable: A report evaluating potential options for reducing the inventory of retained flammable gases in DSTs in a controlled manner. (Original IP expected delivery date: June 2014).

New Expected delivery date: February 2015