



Department of Energy
Under Secretary for Nuclear Security
Administrator, National Nuclear Security Administration
Washington, DC 20585



March 25, 2015

The Honorable Jessie H. Roberson
Vice Chairman
Defense Nuclear Facilities Safety Board
625 Indiana Avenue NW, Suite 700
Washington, D.C. 20004

Dear Madam Vice Chairman:

This letter is in response to the Defense Nuclear Facilities Safety Board (DNFSB/Board) letter dated December 9, 2014, requesting a report and briefing on the National Nuclear Security Administration (NNSA) path forward for resolution of issues identified for the Los Alamos Radioassay and Nondestructive Testing (RANT) Shipping Facility Documented Safety Analysis (DSA). This DSA was approved on July 15, 2014, but has not yet been implemented.

NNSA agrees with many of the issues that the Board has raised. The NNSA/Los Alamos Field Office (NA-LA) and Los Alamos National Security, LLC (LANS) have had extensive dialogue on the underlying issues and how they should be addressed. As a result of new information regarding the seismic capability of the RANT facility, LANS declared a potential inadequacy of the safety analysis (PISA) on December 17, 2014, (NA-LASO-LANL-WASTEMGT-2014-0022, PISA: *Incorrect Assumption for RANT BIO Seismic Analysis*), which acknowledged inadequacies in the seismic analysis in the currently approved and implemented Basis for Interim Operation (BIO). On December 19, 2014, the NA-LA Manager rescinded approval of the RANT DSA.

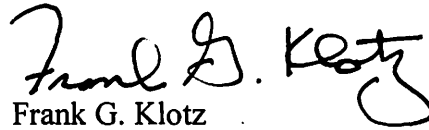
LANS completed the evaluation of the safety of the situation (ESS) on January 20, 2015, and submitted it to NNSA/NA-LA for review and approval. LANS concluded that NNSA approval will be needed for corrective actions. NA-LA is currently reviewing the ESS. Preliminarily, NA-LA expects that RANT seismic events will be re-analyzed based on the conclusions of the ESS.

At the time the PISA was declared, the RANT facility was in Cold Standby Mode, which means there is no material-at-risk allowed at the facility. The RANT facility will remain in Cold Standby Mode until a strategy for mitigating the seismic risk has been proposed and approved with compensatory measures as appropriate. Further, there may be other design bases accidents that are contained within the DSA that may have to be re-evaluated based on issues raised by the DNFSB letter.



Resolving the individual RANT DSA issues identified in your letter may take a considerable amount of time. NNSA will provide a quarterly briefing to the Board regarding progress on resolving these issues with the first briefing occurring by May 1, 2015.

Sincerely,


Frank G. Klotz

cc: J. Olencz, AU-1.1