

Department of Energy Washington, DC 20585

OCT 1 3 2016

The Honorable Joyce L. Connery Chairman Defense Nuclear Facilities Safety Board 625 Indiana Avenue NW, Suite 700 Washington, DC 20004

Dear Chairman Connery:

In a letter dated August 28, 2014, the Department of Energy (DOE) provided a response to the June 18, 2014, Defense Nuclear Facilities Safety Board (Board) letter that established a reporting requirement and transmitted the Board's Staff Issue Report, *Safety Basis Review of 242-A Evaporator at Hanford*. The DOE response included a description of three planned actions which are documented in the 242-A Evaporator Documented Safety Analysis as Design/Operational Improvements:

- 1) <u>Design/Operational Improvement 1</u> to install a non-process, seismically-qualified, safety-significant steam valve by September 30, 2015. This improvement was completed on August 31, 2015.
- 2) <u>Design/Operational Improvement 2</u> implement design changes to ensure that three credited valves in both the safety-significant C-A-1 vessel flammable gas control system and the safety-significant C-A-1 vessel waste high-level control system would be fail-safe in the event of a facility fire. This upgrade was scheduled to be completed by September 30, 2016, but is now projected to be completed by September 30, 2019. Specific Administrative Control 5.8.3, Evaporator and Pump Room Transient Combustible Material Control and Administrative Control 5.10.2, Emergency Response Actions Following Facility Fires, will remain in place until Design/Operational Improvement 2 is completed.
- <u>Design/Operational Improvement 3</u> modify the C-A-1 vessel seismic dump system to automatically initiate upon detection of a seismic event (e.g., a seismic switch). This upgrade was scheduled to be completed by September 30, 2016, but is now projected to be completed by September 30, 2019. Administrative Control 5.9.6, Emergency Preparedness, will remain in place until Design/Operational Improvement 3 is completed.

The 3-year delay for Implementation of Design/Operational Improvements 2 and 3 is due to budgetary and operational impacts associated with the work required to complete the C-Farm single shell tank waste retrieval effort and the need to empty the AY-102 double shell tank due to a leak into the tank annulus.

Compensatory measures have been established in the Technical Safety Requirements and will remain in place until both Design/Operational Improvements have been completed. Administrative controls put in place in 2014 have been effective where applied.

We understand the advantages of engineered controls over the current reliance on administrative controls and are exploring ways to accelerate the delayed schedule.

If you have any further questions, please contact Mr. Kevin Smith, Site Manager, Office of River Protection, at (509) 372-2315.

Sincerely,

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Monica C. Regalbuto Assistant Secretary for Environmental Management