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# DEFENSE NUCLEAR FACILITIES SAFETY BOARD

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March 26, 1998

Mr. James M. Owendoff  
Acting Assistant Secretary for  
Environmental Management  
Department of Energy  
1000 Independence Avenue, SW  
Washington, D.C. 20585-0113

Dear Mr. Owendoff:

A letter from the Defense Nuclear Facilities Safety Board (Board) to Secretary of Energy Peña, dated October 30, 1997, pointed out safety concerns regarding the possible adverse interaction of high-efficiency particulate air (HEPA) filters and the testing of the fire suppression deluge system throughout the Department of Energy's (DOE) defense nuclear facilities complex. Wetting the filters can significantly degrade their performance both short term and long term. Mr. Alvin Alm, the Assistant Secretary for Environmental Management (EM), responded to the Board's letter and concerns on January 15, 1998.

In his response, he acknowledged DOE's "... need to complete a formal assessment of the safety vulnerabilities associated with ventilation filter degradation from wetting during fire system testing." Further, he stated, "... Field Offices *have been asked* [emphasis added] to evaluate and correct related problems." He also referenced an enclosed "lessons learned document." Point five of that document clearly states that "testing of filter plenum fire suppression systems should be performed in a way that does not directly expose filter media to wetting."

The Board's letter of February 9, 1998, to Secretary Peña commended the EM Assistant Secretary for his recognition of the problem. However, as of March 17, 1998, the Field Offices had yet to be instructed to address the problems identified in the Board's letter of October 30, 1997. An occurrence report dated March 9, 1998, from Rocky Flats Environmental Technology Site (RFETS) reflects that the site continues to wet HEPA filters during fire systems testing, a problem which has been confirmed by site representatives.

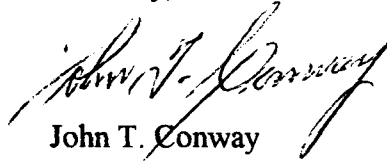
Therefore, pursuant to 42 U.S.C. § 2286b(d), the Board requests a report addressing the specific actions proposed by DOE for: (1) completion of a formal assessment of the vulnerabilities associated with ventilation filter degradation from wetting during fire system testing, (2) evaluation and correction of the problems by the Field Offices, (3) promulgation of the

“lessons learned” document, and (4) improvements in the qualification test program for certification of nuclear ventilation filter materials. The report should provide:

- Confirmation that each proposed action has been or will be accomplished as described, including the specific measures taken to date and when the action was or is expected to be completed.
- For those actions which have not been completed, details of the compensatory measures that will be taken in the interim to ensure the continued safe operation of the ventilation systems.

This report should be furnished to the Board within 30 days of receipt of this letter.

Sincerely,



John T. Conway  
Chairman

c: The Honorable Victor H. Reis  
Mr. Peter N. Brush  
Mr. Mark B. Whitaker, Jr.