



**Department of Energy**

Washington, DC 20585

October 22, 2001

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DNF SAFETY BOARD

The Honorable John T. Conway  
Chairman  
Defense Nuclear Facilities Safety Board  
625 Indiana Avenue, NW  
Suite 700  
Washington, D.C. 20004-2901

Dear Mr. Chairman:

Thank you for your letter of September 25, 2001, regarding the safety basis for the Savannah River Site (SRS) 242-16H (2H) evaporator. Throughout the process leading to a decision on the restart of the evaporator, the Defense Nuclear Facilities Safety Board's (Board) site and headquarters staffs have provided constructive comments and perspectives regarding the interim safety authorization basis for this facility.

The existing Interim Authorization Basis was modified to support the restart of the 2H evaporator to reflect the new systems and controls put in place to address the issue of solids accumulation in the 2H evaporator. In parallel with this effort, a new Authorization Basis is also being developed for the entire Tank Farm to meet the 10 CFR 830, Nuclear Safety Management, requirements and the April 2003 regulatory implementation date. DOE-SR is reviewing the 10 CFR 830 compliant calculations and controls proposed by the site contractor. This review includes an assessment of the contractor's analyses, assumptions, and resulting proposed protection/mitigation strategies.

As expressed in your letter, the Board's staff, DOE-SR, and the site contractor have identified appropriate compensatory measures to support the safe startup of the 2-H evaporator, as well as actions to resolve this safety issue for the long term.

We are committed to assuring that the appropriate levels of safety controls are developed and implemented based on conservative analysis, and we agree with the Board's position regarding the implementation of engineered controls in preference to administrative controls. Engineered controls can provide substantial assurance of enhanced safety and, along with administrative and defense-in-depth controls, they can help assure a balanced protection strategy. Where appropriate, our assessments and actions will reflect a greater reliance on engineered controls than on administrative and procedural controls. We will work to assure continued communication on the Department's choice of safety controls.

I look forward to continuing to work closely with you and your staff in applying Integrated Safety Management as we upgrade our safety authorization basis at SR.

Sincerely,

  
Jessie Hill Roberson  
Assistant Secretary for  
Environmental Management

cc:  
G. P. Rudy, SR