



Department of Energy  
Washington, DC 20585  
MAR 23 2007

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The Honorable A. J. Eggenberger  
Chairman  
Defense Nuclear Facilities Safety Board  
625 Indiana Avenue, NW, Suite 700  
Washington, DC 20004-2941

Dear Mr. Chairman:

The purpose of this letter is to transmit the Office of Environmental Management (EM) response to satisfy Commitment 8.9.1 of the *Department of Energy Implementation Plan for Defense Nuclear Facilities Safety Board Recommendation 2004-2, Active Confinement Systems*, Revision 1, July 2006 [IP]. This response has been coordinated with the Under Secretary for Energy, Science and Environment Central Technical Authority.

EM has conducted an initial review of site procedures and safety bases mechanisms for using the Department's Standard 3009 25 Röntgen equivalent man (rem) evaluation guideline for the establishment of safety class structures, systems, and components (SSCs). This review has shown that in general, EM facilities, by their nature or their existence on large sites, do not challenge the 25 rem guideline. In those few cases where existing, under development, or proposed facilities have conservative unmitigated accident consequences that exceed or challenge the evaluation guideline, the 25 rem evaluation guideline has been used solely for classification of safety controls and not as design criteria.

EM will prepare a more comprehensive report on this subject upon completion of our high priority facility-specific system evaluations as indicated in deliverable 8.9.1 of the IP. With the March 6, 2007, publication of the supplemental evaluation guidance under Commitment 8.6.4, these reviews will now be completed by June 4, 2007. EM will supply the more comprehensive report and its potential lessons learned in June 2007.

If you have any comments or feedback, please call me at (202) 586-0738 or Mr. Dae Y. Chung, Deputy Assistant Secretary for Safety Management and Operations, at (202) 586-5151.

Sincerely,

Dr. Inés R. Triay  
Chief Operating Officer for  
Environmental Management

