

Joyce L. Connery, Chairman  
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**DEFENSE NUCLEAR FACILITIES  
SAFETY BOARD**

Washington, DC 20004-2901



September 23, 2016

The Honorable Ernest J. Moniz  
Secretary of Energy  
U.S. Department of Energy  
1000 Independence Avenue, SW  
Washington, DC 20585-1000

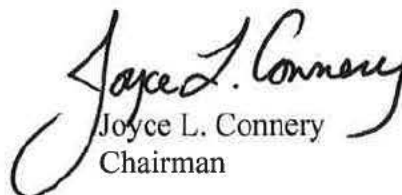
Dear Secretary Moniz:

The Defense Nuclear Facilities Safety Board (Board) is closing Board Recommendation 2010-1, *Safety Analysis Requirements for Defining Adequate Protection for the Public and the Workers*. The Recommendation advised the Department of Energy (DOE) to strengthen its regulatory framework for ensuring adequate protection of the public and workers, particularly in cases where Documented Safety Analyses (DSAs) indicate the potential for mitigated offsite consequences to exceed DOE's Evaluation Guideline of 25 rem Total Effective Dose. In response to Recommendation 2010-1, DOE revised key nuclear safety directives, including DOE Standard 3009, *Preparation of Nonreactor Nuclear Facility Documented Safety Analysis*, and DOE Standard 1104, *Review and Approval of Nuclear Facility Safety Basis and Safety Design Basis Documents*. These updated standards contain significantly improved requirements that clarify DOE's expectations for ensuring adequate protection at DOE defense nuclear facilities.

DOE has nearly completed the actions identified in its Implementation Plan for Recommendation 2010-1. One open commitment involves revising DOE Standard 1189, *Integration of Safety into the Design Process*. We understand that the revision to this standard will no longer include safety analysis requirements and that new facilities and major modifications to existing facilities will instead use the enhanced requirements established by Standard 3009-2014. We also understand that DOE intends to apply elements of the improved safety standards to the two remaining facilities with mitigated consequences that exceed the Evaluation Guideline. Based on these considerations, the Board concludes that DOE's previous and planned actions will satisfy the intent of Recommendation 2010-1.

DOE field elements are currently evaluating existing facility DSAs against new requirements from Standard 3009-2014 that involve protecting the public from radiological hazards. We will continue to review the execution and results of these important evaluations.

Sincerely,

  
Joyce L. Connery  
Chairman

c: Mr. Joe Olencz