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DEFENSE NUCLEAR FACILITIES SAFETY BOARD

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October 23, 2000

The Honorable Bill Richardson
Secretary of Energy
1000 Independence Avenue, SW
Washington, DC 20585-1000

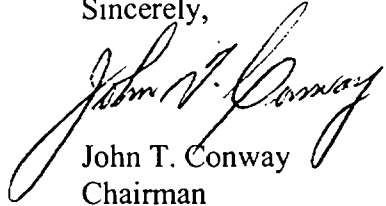
Dear Secretary Richardson:

The Defense Nuclear Facilities Safety Board (Board) recently received a letter dated September 27, 2000, from the Deputy Assistant Secretary for Integration and Disposition reporting completion of several commitments made by the Department of Energy (DOE) in the Implementation Plan for Recommendation 2000-1, *Prioritization for Stabilizing Nuclear Material*. DOE proposed closing these commitments, which were related to draining of piping systems at the Rocky Flats Environmental Technology Site (RFETS), development of a quantifiable risk-based prioritization methodology for stabilization activities at Los Alamos National Laboratory (LANL), initial application of a disposition methodology for plutonium-bearing residues at LANL, and development of a plan and schedule for stabilization of the unsheltered containers at LANL.

The Board agrees with closing the RFETS commitment and the LANL commitment to begin applying the Plutonium Disposition Methodology for disposition of residues. However, based on the information provided in DOE's letter, the Board believes it is not appropriate to close the remaining two LANL commitments. The commitment to provide a plan and schedule for addressing the unsheltered containers has not been met—the DOE letter proposes deferring development of a schedule until the end of October 2000. In addition, sufficient information or a reference that would support closure of the commitment to provide a quantifiable risk associated with each plutonium item and prioritization of these items for stabilization and processing has not been provided. DOE provides only a brief statement that LANL will prioritize its work based on material type, item age, and a number of operational considerations. A table that lists the LANL inventory by material category and item age is provided, but the ranking is not explained (e.g., it is not clear why "hydride" appears to be ranked as a lesser hazard than "water"), and it is unclear what purpose this table serves.

The current Implementation Plan for Recommendation 2000-1 commits DOE to provide a comprehensive plan for stabilization work at LANL by the end of October 2000. The Board expects the LANL plan to document and explain a rational risk-based prioritization and pace of stabilization activities at LANL and to include a firm schedule for eliminating the hazard posed by continued storage of the unsheltered containers at LANL.

Sincerely,

A handwritten signature in cursive script, appearing to read "John T. Conway".

John T. Conway
Chairman

c: The Honorable Carolyn L. Huntoon
The Honorable Madelyn R. Creedon
Dr. John C. Browne
Mr. David G. Huizenga
Mr. Mark B. Whitaker, Jr.