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DEFENSE NUCLEAR FACILITIES SAFETY BOARD



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October 24, 1995

The Honorable Hazel R. O'Leary Secretary of Energy Washington, D.C. 20585-1000

Dear Secretary O'Leary:

During our last quarterly review briefing with you, the Board outlined methods which the Board and its staff use to carefully track completion of Department of Energy (DOE) commitments contained in DOE implementation plans for Board recommendations. For the past few months, the Board and DOE's staff have been discussing consolidation and closure of fully implemented or outdated Board recommendations. The DOE task group that has been established to advance closure and consolidation efforts has been most helpful. Everyone involved agrees that outdated or completed recommendations that are allowed to remain on the books detract attention from higher priority safety work. Therefore, the Board is closing the following recommendations at this time:

• **Recommendation 90-5** (Systematic Evaluation Program for Rocky Flats)

Changes in mission at the Rocky Flats Environmental Technology Site and other actions resulted in the recommendation being overtaken by events. Recommendation 94-3 regarding systems engineering approach, together with other Board recommendations and Public Law 102-190(a) § 3133 (resumption of plutonium operation) are vehicles for pursuing remaining Board safety concerns.

• **Recommendation 90-6** (Plutonium in the Ducts at Rocky Flats)

This recommendation has become outdated. Other Board recommendations and Public Law 102-190(a) § 3133 (resumption of plutonium operation) are vehicles for pursuing remaining Board safety concerns.

• **Recommendation 92-6** (DOE Requirements and Guidance for Operational Readiness Reviews)

Issuance of revised DOE Order on Operational Readiness Reviews closes the recommendation. Remaining issues concerning standards and guidance for nuclear weapons facilities will be pursued under Recommendation 93-1.

• **Recommendation 92-5** (Conduct of Operations at Defense Nuclear Facilities)

This recommendation would be superseded by Recommendation 95-2.

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• **Recommendation 90-2** (DOE's Nuclear Safety Standards Program)

DOE is currently revising its schedule for development and implementation of Standards/Requirements Identification Document (S/RID). The revised schedule will then be consolidated with Recommendation 94-5. Recommendation 95-2 provides additional information which would apply to Recommendation 90-2 closure.

The Board's staff will continue to work with DOE's task group to evaluate the appropriateness of additional recommendation closures. For example, DOE's task group has indicated that all remaining commitments under Recommendation 92-2, regarding DOE facilities representatives, will be met by the end of 1995. The Board's staff is also exploring with DOE's task group ways of consolidating, closing, or more effectively implementing a number of other recommendations including Recommendation 92-4 (Systems Engineering at Hanford's Multi-Function Waste Tank Facility); Recommendation 90-7 (Ferrocyanide Tank Safety); Recommendation 93-5 (Waste Characterization at Hanford Tank Farms); and Recommendation 91-6 (Radiological Control Improvements). The Board will keep you informed of progress in this important joint effort.

Sincerely,

John T. Conway Chairman

cc: Mark Whitaker