

Department of Energy
Savannah River Operations Office
P.O. Box A
Aiken, South Carolina 29802

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JAN 13 2004

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

Dear Mr. Chairman:

SUBJECT: Tailoring Department of Energy (DOE) Requirements

At the public meeting you held in Washington, DC on December 4, 2003, you requested that I provide examples of directive requirements which had been reduced or eliminated to support accelerated closure. While the Westinghouse Savannah River Company (WSRC) has tailored some of their programs and procedures which enable compliance with DOE requirements, very few DOE requirements have been changed. Mr. Pedde, President of WSRC, is responding separately on his organization's activities in this area.

While many people talk of tailoring DOE requirements, the instances they cite do not actually involve changing the DOE requirements. In most cases, the perceived change in requirements is actually a matter of exercising the latitude provided in the requirement on implementation.

For example, DOE O 5400.5, Radiation Protection of the Public and the Environment, does not have a limit for the release of volumetrically contaminated material. It requires that each methodology be approved by the Office of Environment, Safety and Health (EH) on a case by case basis. So the alternate release criteria for the Savannah River Operations Office, which was recently approved by EH, is the result of using the latitude provided in the underlying requirements document.

One requirement that has been changed relates to the DOE Radiological Control Manual (DOE/EH 056T). Originally issued in 1992, it was subsequently cancelled by DOE N 441.1 in September 1995. In April 2002, the Savannah River Operations Office approved a change to the WSRC Standards and Requirement Identification Document, which deleted the manual. However, we maintained the requirement for WSRC to document technical equivalency for any instance where they elect an alternative approach to a "should" requirement contained in the Department's Radiological Control Standard (DOE-STD-1098-99).

Mr. Chairman

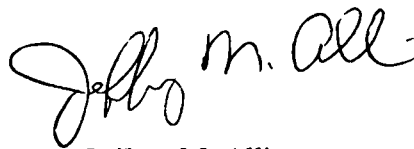
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While accelerating closure and completion of the Office of Environmental Management's mission will result in savings to the taxpayers, I want to assure you that I will not compromise the safety of our workers, the public or the environment for the sake of accelerated closure.

If you or your staff have any questions, please feel free to contact me at 803-952-6337.

Sincerely,

A handwritten signature in black ink that reads "Jeffrey M. Allison". The signature is written in a cursive style with a large, stylized "J" and "A".

Jeffrey M. Allison
Manager

GA-04-0040

cc: Jessie Hill Roberson (EM-1), HQ
Paul Golan (EM-2), HQ
Mark Whitaker (DR-1), HQ