John T. Conway, Chairman
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DEFENSE NUCLEAR FACILITIES SAFETY BOARD

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98-0000760

December 30, 1997

The Honorable Federico F. Peña
Secretary of Energy
1000 Independence Avenue, SW
Washington, D.C. 20585-1000

Dear Secretary Peña:

The Defense Nuclear Facilities Safety Board (Board) has received the Implementation Plan of the Department of Energy (DOE) for the Board's Recommendation 97-2. The Board accepts this Implementation Plan, and looks forward to the realization of the program that it proposes.

However, the Board suggests that the Plan ensure archiving of results of calculations of neutron multiplication for critically safe situations which are encountered in practice, and which become the basis for criticality limits in DOE's operations. For instance, calculations of critically safe configurations in gloveboxes do not need to be repeated at a facility if the essentially identical situation has previously arisen and has been successfully analyzed at the same or another facility. The same consideration would be pertinent to other applications, such as storage of waste containers. The proposal in Commitment 6.4 to publish the results compiled by a Parameter Study Work Group appears to address this objective, but the compilation referred to should be augmented if and as new analyses become available.

DOE is to be congratulated for having developed a structure of operation in this instance that ensures simultaneous cross-cutting attention to the ongoing requirements of several Principal Secretarial Offices. The Board has recently stressed the need for such arrangements in other situations, such as those encountered in implementation of the Board's Recommendation 94-1. Perhaps the system to be used to implement Recommendation 97-2 can become something of a template for other cross-cutting actions.

The Board agrees that the plan for implementation of Recommendation 97-2 subsumes the commitments made relative to Recommendation 93-2, and the latter can be considered closed.

Sincerely,

John T. Conway
Chairman

c: Mr. Mark B. Whitaker, Jr.