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The Secretary of Energy
Washington, DC 20585

March 19, 2008

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DEFENSE NUCLEAR FACILITIES SAFETY BOARD

The Honorable A. J. Eggenberger
Chairman
Defense Nuclear Facilities Safety Board
625 Indiana Avenue, NW, Suite 700
Washington, DC 20004-2901

Dear Mr. Chairman:

The Department of Energy (DOE) acknowledges receipt of the Defense Nuclear Facilities Safety Board (Board) Recommendation 2008-1, *Safety Classification of Fire Protection Systems*, issued on January 29, 2008.

As identified in your letter, the Department has general design requirements for safety systems. We agree with the Board that safety systems for each project can be evaluated individually, but that it would be beneficial to establish guidance on translating requirements into specific fire protection design and operating features for more frequently used fire protection systems. As acknowledged, it may not always be necessary to meet criteria for redundancy, nuclear-grade quality assurance, or seismic qualification. As suggested in Recommendation 2008-1, our implementation will leave room for engineering judgment and innovative approaches in such cases. As discussed in this letter, we accept the Board's recommendation and will respond by developing an Implementation Plan that:

- Identifies additional design and operational criteria for newly classified (but not existing) safety-class and safety-significant fire protection systems where warranted;
- Revises DOE Standard-1066-99, *Fire Protection Design Criteria*, to provide additional guidance for design and operation of selected fire protection systems designated as safety-class or safety-significant by the relevant Documented Safety Analysis. This guidance will include the appropriate level of detail that considers the uniqueness of fire scenarios;
- Identifies Nuclear Regulatory Commission and commercial design codes and standards that could be applied to safety-class and safety significant fire protection systems; and



- As necessary, modifies DOE Guide (G) 420.1-1, *Nonreactor Nuclear Safety Design Criteria and Explosive Safety Criteria Guide for use with DOE O 420.1, Facility Safety*, and DOE G 420.1-3, *Implementation Guide for DOE Fire Protection and Emergency Services Programs for Use with DOE O 420.1B, Facility Safety*, to ensure compatibility with the new guidance for fire protection systems.

We will interact with the Board and Board staff as we develop our Implementation Plan. I have assigned Mr. Andrew C. Lawrence, Director, Office of Nuclear Safety and Environment, Office of Health, Safety and Security, to be the Department's responsible manager for developing the Implementation Plan. He can be reached at (202) 586-5680.

Sincerely,

A handwritten signature in cursive script that reads "Samuel Bodman". The signature is written in black ink and is positioned above the printed name.

Samuel W. Bodman