

[DNFSB LETTERHEAD]

August 7, 1995

The Honorable Thomas P. Grumbly
Assistant Secretary for Environmental Management
Department of Energy
Washington, D.C. 20585

Dear Mr. Grumbly:

Westinghouse Savannah River Company (WSRC) has performed analyses that suggest the In Tank Precipitation Facility's high level waste (HLW) tanks would probably remain intact (leak tight) if they were subjected to seismic activity consistent with that normally assumed review of a hazard category 2 facility. However, the Defense Nuclear Facilities Safety Board (Board) believes there are accident scenarios which could result in significant off-site consequences. The Board has also concluded that while significant uncertainties exist in the ability of the facility to survive design basis natural phenomena events, potential corrective actions (upgrades) are severely limited since the tanks currently contain significant quantities of HLW. A prudent and practicable approach to minimizing the potential effects of a release of HLW is to enhance mitigation and emergency preparedness measures.

During the Board meeting of May 4, 1995, this subject was discussed in detail with representatives from the Department of Energy's (DOE) Headquarters, DOE Savannah River Operations Office, and WSRC. The DOE committed to take actions to clearly and conservatively identify the accident progression scenarios resulting from an above- or below-ground release of tank contents, to specify actions that would be taken, and to conservatively demonstrate that the resources required (both hardware and personnel) would be allocated within the allotted time frame to perform the specific tasks.

The Board and its staff received and reviewed the draft document, *Spill Contingency Plan for H-Area Tank Farm*, dated June 28, 1995. This document does not satisfy the requirements mentioned above. It did not sufficiently evaluate accident progression nor did it identify and confirm that the specific actions to be taken and the resources required to mitigate the scenarios of interest are available.

Therefore, pursuant to 42 U.S.C. § 2286b(d), the Board requests that DOE provide a brief report that identifies:

- Accident progression scenarios in the event of an above- or below-ground release of HLW tank contents.
- Specific mitigative actions that would be taken to prevent unacceptable environmental consequences.
- Hardware and personnel resources required to perform the mitigation activities in the allowable time frame.
- Justification that these resources will be available and are sufficient to successfully perform the identified activities.

The Board requests that the above report be submitted within 60 days of receiving this letter. If you need any further information, please let me know.

Sincerely,

John T. Conway
Chairman

c: Mr. Mark Whitaker
Dr. Mario Fiori