

(2)

ERID# 87047

United States Government

Department of Energy

National Nuclear Security Administration

Los Alamos Site Office

Los Alamos, New Mexico 87544

memorandum

DATE: November 26, 2003
 REPLY TO: SABM Steele re Post 4/10/03 10CFR830.207 CATEGORIZATION OF NUCLEAR FACILITIES
 ATTN OF: New Categorization of Existing Nuclear Facilities at LANL
 SUBJECT:

TO: Jim Holt, Associate Laboratory Director of Operations, MS-A104
 Attn: Beverly Ramsey, RRES Division Leader, RRES-DO MS-J591
 Jim Angelo, PS Division Leader, PS-DO, MS-C-347

On November 21, 2003, Los Alamos National Laboratory (LANL) submitted a deliverable in response to a request I made on November 5, 2003 to expedite resolution of the outstanding issues including categorization of existing nuclear facilities required by 10 CFR 830.202, Documented Safety Analysis (DSA) production (10CFR830.207), and Technical Safety Requirement (TSR) production (10CFR830.205). DSA and TSRs cannot be produced until facility categorization is complete. The suspense date for production of a DSA and TSRs was April 10, 2003.

I have reviewed the proposed categorization of the 11 nuclear facilities at LANL per memorandum RRES-DO:03-138, dated November 21, 2003 (Attachment 1 sans memorandum attachments). There are 5 proposed Nuclear Hazard Category 2 facilities listed which means that they have 900g or more of ²³⁹Pu equivalent in each of them per DOE-STD-1027. There are 6 proposed Nuclear Hazard Category 3 facilities which means that they have between 8.4g ²³⁹Pu and 900g ²³⁹Pu equivalent in them per DOE-STD-1027. I find that the categorization is reasonable and based upon the best available data and engineering judgment and concur on these categorizations as per below:

Combined TA and PRS Reference	Brief Description of Site
Nuclear Hazard Category 2 (greater than or equal to 900g ²³⁹Pu equivalent)	
TA-21-014	Material Disposal Area A
TA-21-016	Material Disposal Area MDA T
TA-49-001(a)-00	Material Disposal area AB
TA-50-009	Material Disposal area C
TA-53-005(b)-99	Underground Tank (Spent resins)
Nuclear Hazard Category 3 (between 8.4g and 900g ²³⁹Pu equivalent)	
TA-10-002(a)-99	Former liquid disposal complex
TA-21-015	Former Liquid disposal Area B
TA-35-001	MDA W Sodium Storage Tanks
TA-35-003(a)-99	Wastewater treatment plant
TA-35-003(d)-00	Wastewater treatment plant – Pratt Canyon
TA-54-004	Material disposal Area H

The referenced memorandum states that 12 additional Potential Release Sites (PRS) meet the threshold for categorization as nuclear facilities and they were also verified to be "within the safety bases of existing nuclear facilities." Page 1-2 of the Attachment to the referenced transmittal memo when combined with page 1-6 indicates that these 12 sites are within the

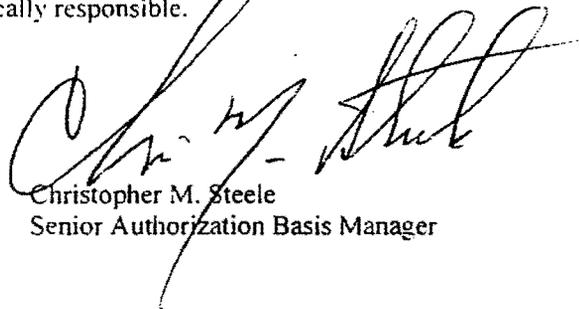
10773



boundary of an operating radiological or nuclear facility. The inference being that the particular facility involved would be the owner of this issue under their respective existing safety basis responsibilities. In conversations with LANL on November 25, 2003, I obtained some clarification of these statements and it is not fully clear that the 12 additional sites are fully addressed in existing site safety basis documentation. Therefore, the Associate Director for Operations is requested to determine, through application of the USQ process, whether the hazards associated with the 12 additional sites are addressed adequately, and in a CFR compliant manner, in the respective nuclear safety bases of affected sites (2 within RLWTF, 1 within WCCRF, 1 within TA55, and 8 within TA-54) for existing safety bases. To promote safety and operational efficiency, I would like to see this determination made by December 30, 2003. For sites, which have submitted new nuclear safety bases, which are under currently review by this office, a similar determination using similar methods must be made also due the same date.

On candidate (Firing Site E-F) has not been categorized per the referenced memorandum. I will support your request to meet on this as soon as possible after November 27, 2003 per the referenced memorandum to complete this.

The next area of emphasis necessary to bring LANL into compliance with 10CFR830 Subpart B (and the associated Price Anderson Amendments Act) is for LANL to produce an appropriate DSA(s) and TSRs in a timely manner to ensure protection of workers, the public, and the environment by ensuring adequate safety controls. Per previous discussions, use of the DOE-STD-1120 CFR Safe Harbor is an acceptable approach to NNSA and per previous discussions it is expected that this method defines a reasonably graded approach that guarantees public, worker, and environmental safety and is also fiscally responsible.



Christopher M. Steele
Senior Authorization Basis Manager

cc w/attachments:

X. Ascanio, NA-124, HQ/GTN
R. Erickson, Manager, LASO
G. Schlapper, SSA, LASO
J. Vozella, AMFO, LASO
C. Keilers, DNFSB, LASO
J. Angelo, PS-DO, LANL, MS-C304
D. Satterwhite, PS-OAB, LANL, MS-K561
C. Steele, SABM, LASO
L. Knoell, SABT, LASO
R. Tom, SABT, LASO
N. Sandoval, SABT, LASO
R. Janke, SABT, LASO
D. Nez, SABT, AL
R. Capshaw, SABT, LASO
R. Cramberg, SABT, LASO
J. Houghton, SABT, LASO
J. Fredlund, SABT, LASO
R. Cramberg, SABT, LASO

This Document is UNCLASSIFIED and contains no UCNI, Christopher M. Steele, November 25, 2003. Safety Analyst, ADC. ADC signature included in memo final approval above.