Fluor Fernald, Inc.
P.O. Box 538704
Cincinnati, OH 45253-8704

006259

FLUOR

March 16, 2006

Fernald Closure Project
Letter No. C:CPD:2006-0059

Mr. Johnny W. Reising, Director
U. S. Department of Energy
Ohio Field Office – Fernald Closure Project
175 Tri-County Parkway
Cincinnati, Ohio 45246

Dear Mr. Reising:

CONTRACT DE-AC24-01OH20115, DOWNGRADE OF SILO 3

Reference: 1) Quality Evaluation Plan No. 2030083, *Inspection of Silo 3 to Estimate Inventory*, March 14, 2006
2) SA-Calc-0060, *Determination of Inventory for Silo 3 That Permits Downgrading to Less Than HC3*, March 14, 2006

Fluor Fernald, Inc. (Fluor Fernald) submits for your concurrence the documentation for downgrading the Silo 3 structure, from Hazard Category 3 to Less Than Nuclear, per the criteria specified in Department of Energy (DOE) standard DOE-STD-1027-94. The associated Technical Safety Requirements (TSRs) and Hazard Analysis Reports will be deactivated to reflect this downgrading.

Silo 3 retrieval activities have been completed, and the waste has been transferred to IP-2 packages. The hazards for this transferred material are addressed in the *Silo 3 Retrieval and Disposition Nuclear Health and Safety Plan* (N-HASP).

The Silo walls have been cleaned with a wire brush. Any remaining residual waste in the Silo has been verified by independent inspection (Ref. 1) to be less than the Hazard Category 3 Threshold Quantity (TQ) of 15,159 pounds. Note that the residue in the hopper, as recorded in Reference 1, is not Silo inventory. It is part of the retrieval facility inventory. Rinsing of the interior walls of the Silo will occur soon, further reducing the inventory. The TQ was determined (Ref 2) based on the isotopic distribution of the Silo 3 waste material as documented in the RFIS document, the same distribution that was used in accident analyses in the Silo 3 N-HASP. Therefore, the residual material inventory has no potential for significant localized consequences.

Downgrading will result in the deactivation of: 1) 40000-HS-0001, *Technical Safety Requirements Document for the Operable Unit 4 (OU4) Silos*, 2) 40000-RP-0028, *Hazards Analysis Report (HAR) for Operable Unit 4 Silos*, and 3) RMR-0445-0056-002, *Preliminary Hazards Analysis Report for Silo 3*.

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Upon downgrading, Fluor Fernald will transfer the safety basis for Silo 3 from Nuclear documents (HAR, PHAR, TSRs, N-HASP) to the Facilities Decontamination and Demolition (D&D) Projects Integrated Health and Safety Plan (I-HASP) 60400-PL-0011. An Unreviewed Safety Determination Question (USQD) documents this request for downgrading and document deactivation, in USQD-2006-0001, *Downgrade of Silo 3, and Deactivation 40000-H&S-0001, TSRs, to Reflect Downgrade* (enclosed).

If you have any questions or concerns, please contact Pat Fisk at (513) 373-5610.

Sincerely,

for

Cornelius M. Murphy
Closure Project Director

CMM:PF:jmb

Enclosure

c: With Enclosure

Dennis J. Carr, MS 77
Mark J. Cherry, MS 77
Joseph Desormeau, DOE-OH/FCP, MS 2
Patricia L. Fisk, MS 99
Timothy L. Jones, DOE Contracting Officer, DOE/EMCBC
Dennis Sizemore, Fluor Fernald, Inc. Prime Contract, MS 1
Steven J. Wentzel, MS 77
Administrative Record (w/2 copies of Enclosure), MS 6
File Record Subject: Downgrade of Silo 3
Letter Log Copy, MS 1
Project Number: 40430

Without Enclosure

Christina Carr, DOE-OH/FCP, MS 2

QUALITY EVALUATION PLAN

QEP No. 2 0 3 0 0 8 3 Rev. 0

1. Item/Title/Description: INSPECTION OF SILO 3 TO ESTIMATE INVENTORY	
2. Project/Task: (40430) Silo 3 Project	3. Specification/Drawing/PO/Req.: Reference: SA-CALC-060 Revision 0
4. Division Title and Number/Department Title: Silo's (430000)/ Silo 3 Project	5. Approved For Use (When Required): Signature: N/A Date:

6. Char. No.	7. Evaluation Characteristic (Code/Specification, Inspection/Test/Examination Techniques, Acceptance Criteria)	8. Status SAT	8. Status UNSAT	9. General Remarks
1.	Verify the walls are visibly clean.	X		The inside of Silo 3 was inspected to estimate the quantity of residue material that was left on the walls of this structure. From my inspection, the wall surfaces have been adequately cleaned using a wire brush. However, there were small areas that did not show evidence of being cleaned. These areas accounted for approximately 10% of the Silo wall area. Also, along the corner of the silo where the wall abuts to the floor there was about a 2-inch strip on either side of the corner that could not be completely cleaned. The thickness of the residue in this area was reduced to approximately ½ inch. The hopper feeding the inclined conveyor had approximately 4000 lbs of residue in it. Below is an estimate of the quantity of residue in Silo 3: 3500 lbs 10% Unclean walls 4000 lbs Residue in hopper 2000 lbs Residue in silo corner 9,500 lbs Total Residue The estimated total residue that is on the walls of Silo 3 is approximately 9,500 lbs. This quantity is less than 15,159 lbs.
2.	Verify the inventory of Silo 3 is less than 15,159 lbs, which is about four bags by current techniques. Note that a uniform layer of 1 inch of material affixed to the Silo walls would be 34,557 pounds.	X		

10. Inspector (Printed Name) Mike Godber (Signature) Michael Godber	Date: 3/14/06
11. QC Manager/Designee (Printed Name) Mike Bishop (Signature) Paul M Bishop	Date: 3/14/06

S&H CALCULATION

Determination of Inventory for Silo 3 That Permits Downgrading to Less Than HC3

REV. 0

MARCH 2006

1.0 INTRODUCTION

The purpose of this calculation is to determine the residual inventory levels that must be achieved to permit downgrading of the facility to Less Than Hazard Category 3, by comparison to Threshold Quantities (TQs) from DOESTD-1027-92.

2.0 ASSUMPTIONS

Isotopic distribution and material inventory numbers are from the Silo 3 NHASP, Appendix B, Table B.3-1.

Silo is 80 feet in diameter, 33 feet tall, for a wall surface area of 8293.8 square feet, or 1,194,307.9 square inches. Assuming a density of 50 pounds per square foot, a uniform 1" layer on the silo wall would be 34,557 pounds of material.

Density is the same as was used in accident analyses in the NHASP (Appendix G, Section G-2.3 Common Assumptions, bullet 2).

3.0 CALCULATIONS

See Attached Excel Spreadsheet.

4.0 RESULTS

The inventory of Silo 3 must be less than 15,159 pounds, which is about four bags by current loading techniques. Note that a uniform layer of 1" of material affixed to the Silo walls would be 34,557 pounds. Therefore the silo walls must be visibly clean

5.0 REFERENCES

1. 40430-PL-0010, Silo 3 Retrieval and Disposition NHASP.

2. DOE STD-1027-92, Hazard Categorization and Accident Analysis Techniques for Compliance with DOE Order 5480.23, Nuclear Safety Analysis Reports.

Fluor Fernald, Inc., Safety and Health Calculation Worksheet	Determination of Inventory for Silo 3 That Permits Downgrading to Less Than HC3	
DEPARTMENT: Safety Analysis Team (SAT)	ORIGINATED BY: P.L. Fisk Signature P. L. Fisk Print Name & Title	DATE: 3/14/06
CALCULATION NO: SA-CALC-060 Revision 0	REVIEWED BY: [signature] Signature Jim Barber, Silos Lead Radiological Engineer Print Name & Title	DATE: 03/14/06
PROJECT: Silos	ADDITIONAL REVIEW BY: Signature NA Print Name & Title	DATE:

SUBJECT: The purpose of this calculation is to determine the residual inventory levels that must be achieved to permit downgrading of the facility to Less Than Hazard Category 3, by comparison to Threshold Quantities (TQs) from DOE-STD-1027-92.

CONCLUSION/SUMMARY:

Using the sum of the ratios method the inventory of Silo 3 must be less than 15,159 pounds, which is about four bags by current loading techniques. Note that a uniform layer of 1" of material affixed to the Silo walls would be 34,557 pounds. Therefore the silo walls must be visably clean.

S&H CALCULATION

Determination of Inventory for Silo 3 That Permits Downgrading to Less Than HC3

REV. 0

MARCH 2006

1.0 INTRODUCTION

The purpose of this calculation is to determine the residual inventory levels that must be achieved to permit downgrading of the facility to Less Than Hazard Category 3, by comparison to Threshold Quantities (TQs) from DOESTD-1027-92.

2.0 ASSUMPTIONS

Isotopic distribution and material inventory numbers are from the Silo 3 N-HASP, Appendix B, Table B.3-1.

Silo is 80 feet in diameter, 33 feet tall, for a wall surface area of 8293.8 square feet, or 1,194,307.9 square inches. Assuming a density of 50 pounds per square foot, a uniform 1" layer on the silo wall would be 34,557 pounds of material.

Density is the same as was used in accident analyses in the N-HASP (Appendix G, Section G-2.3 Common Assumptions, bullet 2).

3.0 CALCULATIONS

See Attached Excel Spreadsheet.

4.0 RESULTS

The inventory of Silo 3 must be less than 15,159 pounds, which is about four bags by current loading techniques. Note that a uniform layer of 1" of material affixed to the Silo walls would be 34,557 pounds. Therefore the silo walls must be visibly clean

5.0 REFERENCES

1. 40430-PL-0010, Silo 3 Retrieval and Disposition N-HASP.

2. DOE STD-1027-92, Hazard Categorization and Accident Analysis Techniques for Compliance with DOE Order 5480.23, Nuclear Safety Analysis Reports.

Radionuclide	Silo 3 Radionuclide Inventory (Ci)	HC-3 Threshold (Ci)	HC-2 Threshold (Ci)	Fraction of HC-3 Threshold	Determine Curie Inventory that will be Less Than HC3 (/527)		
Ac-227	3.4	0.042	4	8.10E+01	6.45E-03		
Ac-228	1.5	940	430,000	1.60E-03	2.85E-03		
Bi-210	12.6	320	150,000	3.94E-02	2.39E-02		
Bi-212	1.3	2,000	430,000	6.50E-04	2.47E-03		
Bi-214	14	8,200	430,000	1.71E-03	2.66E-02		
Fr-223	0	8,200	430,000	0.00E+00	0.00E+00		
Pb-210	12.6	0.36	2,200	3.50E+01	2.39E-02		
Pb-211	3.4	6,200	430,000	5.48E-04	6.45E-03		
Pb-212	1.3	320	430,000	4.06E-03	2.47E-03		
Pb-214	14	8,200	430,000	1.71E-03	2.66E-02		
Po-210	12.6	1.9	350	6.63E+00	2.39E-02		
Pa-231	2.3	0.2	55	1.15E+01	4.36E-03		
Pa-234	0	1,520	430,000	0.00E+00	0.00E+00		
Pa-234m	6.4	1,520	430,000	4.21E-03	1.21E-02		
Ra-223	3.4	62	3,800	5.48E-02	6.45E-03		
Ra-224	1.3	200	9,900	6.50E-03	2.47E-03		
Ra-226	14	12	55	1.17E+00	2.66E-02		
Ra-228	1.5	12	55	1.25E-01	2.85E-03		
Th-227	3.4	32	55	1.06E-01	6.45E-03		
Th-228	2.7	1	92	2.70E+00	5.12E-03		
Th-230	218.3	0.62	89	3.52E+02	4.14E-01		
Th-231	0.4	12,000	430,000	3.33E-05	7.59E-04		
Th-232	3.1	0.1	18	3.10E+01	5.88E-03		
Th-234	6.5	2,800	430,000	2.32E-03	1.23E-02		
U-234	6.3	4.2	220	1.50E+00	1.20E-02		
U-235/236	0.4	4.2	240	9.52E-02	7.59E-04		
U-238	6.5	4.2	240	1.55E+00	1.23E-02		
Rn-220	3	2	55	1.50E+00	5.69E-03		
Rn-222	14	10	260,000,000	1.40E+00	2.66E-02		
Total (Ci)	370.2						
Mass (lbs)	7.99E+06						
			Sum of the Fractions	5.27E+02	7.02E-01		

From N-HASP, total Silo 3 inventory is 7.99E6 pounds, 370 curies

To determine curies at which inventory is Less Than HC3, divide Fraction of HC3 by Sum of Fraction (527)

Result is 0.702 curies

To determine inventory in pounds divide 0.702 by total curies (370), then multiply by total pounds (7.99E+6)

Result is 15,159 pounds (about four bags by current loading techniques)

FYI-a uniform 1" layer of material on the Silo wall would be 34,557 pounds, so this must look clean

FCP USQ SCREEN

USQD-2006-0001

(Obtain USQD/SE Log number from Document Control [formerly ECDC])

ISSUE TITLE (Enter brief title identifying issue being evaluated):
Downgrade of Silo 3, and Deactivation of 40000-H&S-0001, TSRs, to Reflect Downgrade

FACILITY AND LOCATION (Enter building or facility, including number, where issue exists or issue will be):
Silo 3

AUTHORIZATION BASIS DOCUMENTS & REFERENCE DOCUMENTS (Enter the DOE-approved safety basis documentation such as DSA/HAR/BIO/SER/TSR/SBR/NHASP. Identify additional reference documents. If NO DOE-approved safety documentation exists that addresses the issue, activity or facility, go to NS-0003 to initiate a safety assessment or NS-0008 for SBDR Process) List documents: Document number, revision, title.

- RMR-0445-0056-002, *Preliminary Hazards Analysis Report for Silo 3624-P622 50*, Rev. 0, *PHAR for the Silos 1 and 2 Accelerated Waste Retrieval Project*
- 40000-HS-0001, Rev. 5, *Technical Safety Requirements Document for the Operable Unit 4 (OU4) Silos*
- 40000-RP-0028, Rev. 0, *Hazard Analysis Report for Operable Unit 4 (OU4) Silos.*
- 40430-PL-0010, Rev. 2, PCN 11, *Silo 3 Retrieval and Disposition Nuclear Health and Safety Plan.*
- Ref.: Memo DOE-0012-03, *Review of Operable Unit 4 Silos Project Safety Basis Documentation*, Oct. 7, 2002.
- Ref.: SA-CALC-0060,

BRIEF DESCRIPTION OF ISSUE (Obtain and present a brief description of the issue to be evaluated. Attach or reference here a copy of the issue package, such as a proposed work plan):
The TSR will be deactivated and Silo 3 downgraded to reflect completion of waste retrieval in Silo 3. This will allow D&D work to progress.

USQ SCREEN RESULTS SUMMARY

NOTE: If the answers to the questions posed on page 2 of this form are all NO, a USQD/Safety Evaluation is not required; a potential USQ does not exist. A YES answer to any of the questions 1, 3-7 shall require a safety evaluation. If question 1 is answered NO, and question 2 is answered YES, then the issue is excluded from further screening and a safety evaluation is NOT required.

☐ **TSR/SBR Change Required.** (Perform a USQD/SE and obtain DOE Approval)

■ **Safety Evaluation Required.** (Question 2 is NO *and* at least one question 1, 3-7 is YES)

☐ **Safety Evaluation Not Required.** (Either item 1 is NO *and* item 2 is YES, *OR* all are NO)

SIGNATURES: (Print name/signature) DATE

Jerry Brandenburg / Patricia L. Fisk FOR — 3/8/06
Technically Responsible Individual

Patricia L. Fisk — 3/8/06
Qualified Safety Evaluator

Tulanda Brown — 3/14/06 ~~3/8/06~~ (TB)
Manager, Nuclear & System Safety

USQ SCREEN PREVENTS UNNECESSARY SAFETY EVALUATIONS: (Use NS-0002 to aid determination of responses.)

1. Does this issue change, or add to, the descriptions/discussions or activities of nearby or adjacent facilities/activities addressed in any DOE-approved documented safety analysis?

☐ YES ■ NO Explain (include the number and title of the document being impacted):
This issue does not change the descriptions/discussions or activities of any adjacent facilities/activities: It impacts only Silo 2.

If YES is the answer to item 1, skip item 2 (the issue cannot be excluded) and continue the screen.

2. IF the answer to item 1 is NO, THEN is this issue Excluded from the USQD/SE System? (GO to NS-0002, Attachment 1):

■ NO

☐ YES, list the exclusion:

If question 1 is answered NO, and question 2 is answered YES, then the issue is excluded from further screening and a safety evaluation is NOT required. Refer to NS-0002, Section 7.5, for instructions for completing the Results Summary and Signatures blocks. If question 2 is answered NO, continue the screen.

3. Does the issue involve changes to the facility description/discussion, including equipment, operations/activities, and building contents, in the applicable DOE-approved documented safety analysis?

■ YES ☐ NO Explain: Silo 2 will be deleted from 40000-HS-0001 to reflect its status as a Less Than Nuclear facility.

4. Does the issue involve significant changes to the procedures described in the applicable DOE-approved documented safety analysis? (As a reminder, inconsequential changes such as spelling or typographical corrections, grammatical changes, clarifications, or note references, are not considered significant changes.)

■ YES ☐ NO Explain: The silo dome access permit will be revised to reflect the downgrade of Silo 2 to Less Than Nuclear.

5. Does the issue involve tests, experiments, or processes NOT described and considered in the applicable DOE-approved documented safety analysis?

☐ YES ■ NO Explain: No new tests, experiments, or processes are involved with this downgrading activity.

6. Does the issue involve non-radiological hazardous materials NOT described and considered in the applicable DOE-approved documented safety analysis?

☐ YES ■ NO Explain: This issue does not concern any new non-radiological hazardous material.

7. Could the issue affect nuclear criticality safety in a way NOT previously evaluated?

☐ YES ■ NO Explain: This issue has no impact on nuclear criticality safety.

USQD/SE SUMMARY & EVALUATION

Log No.: USQD-2006-0001

Charge No:	Issue (Project/Activity) Title: Downgrade of Silo 3, and Deactivation of 40000-H&S-0001, TSRs, to Reflect Downgrade	
TR Printed Name: Jerry Brandenburg	TR Organization/Project: Silos Safety and Health	TR Phone: 373-5617

QSE Printed Name:	Organization:	Badge No:
Patricia L. Fisk	SH&Q/NSS	10710
QSE Signature: Patricia L. Fisk	Phone: 373-5610	Date: 3/8/06

CONCLUSIONS:

☐ Discovered Inadequacy ■ Proposed Activity/Change	Change to DOE-approved TSR/SBR? Yes	If YES, enter TSR/SBR document number: 40000-H&S-0001 Rev. 5	Does Issue Constitute USQ?: No

SIGNATURES: [Print name/signature]

Tulanda Brown — Date: _____

Manager, Nuclear & System Safety

If a USQ, SRC REVIEW RESULTS: _____ **Concur**

_____ Date: _____

Safety Review Committee Chair

If a USQ, APPROVAL SIGNATURE:

Fluor Fernald Executive Project Director: _____ Date: _____

* * * *

USQD/SE (cont)

Log No.: USQD-2006-0001

BRIEF DESCRIPTION OF ISSUE (Obtain and present a brief description of the issue to be evaluated, including any potentially affected adjacent systems or facilities. Attach and reference here the USQ Screen AND a copy of the issue package such as: a proposed activity package, a deficiency report, or a discovered inadequacy, reduction of TSR/SBR margin of safety, or unauthorized change description.)

The TSR will be deactivated and Silo 3 downgraded to reflect completion of waste retrieval in Silo 3. This will allow D&D work to progress.

SUMMARY OF SAFETY EVALUATION RESULTS: List in the table the responses to the USQD/Safety Evaluation.

Quest No.	Question	Reference (DS no.)	Response (YES/NO)
1	Could the issue increase the probability of occurrence of an accident previously evaluated in applicable DOE-approved documented safety analysis?	DS- 1	NO
2	Could the issue increase the consequences of an accident previously evaluated in applicable DOE-approved documented safety analysis?	DS- 1	NO
3	Could the issue increase the probability of occurrence of a malfunction of equipment important to safety previously evaluated in applicable DOE-approved documented safety analysis?	DS- 1	NO
4	Could the issue increase the consequences of a malfunction of equipment important to safety previously evaluated in applicable DOE-approved documented safety analysis?	DS- 1	NO
5	Could the Issue create the possibility of an accident of a different type than any previously evaluated in applicable DOE-approved documented safety analysis?	DS- 2	NO
6	Could the issue create the possibility of a malfunction of equipment important to safety of a different type than any previously evaluated in applicable DOE-approved documented safety analysis?	DS- 2	NO
7	Does the issue reduce the margin of safety as defined in the basis for any Technical Safety Requirement (TSR) or DOE-approved Safety Basis Requirement (SBR)?	DS- 2	NO

USQD/SE DOCUMENTATION SHEET(s)

Log No.: USQD-2006-0001

Complete the discussion and justification as described in NS-0002, the USQD/SE System procedure. Ensure that the justification for the response is sufficiently detailed and understandable that others, such as members of the SRC, could come to the same response or at least understand why you chose the response you did. This table is an electronic form and will expand to however many number of pages are needed to adequately address the required responses for each question.

Question No. & Response	USQD Questions/ Discussion & Justification
1 NO	**Could the issue increase the probability of occurrence of an accident previously evaluated in applicable DOE-approved documented safety analysis?**
The safety analyses for Silo3 are documented in the OU4 HAR, the Silo 3 PHAR and the Silo3 Retrieval and Disposition N-HASP. The Evaluation Basis Accidents (EBAs) associated with the Silo 3 project from the PHAR all concern release of sufficient nuclear material to have the potential for significant localized consequences. Sufficient hazardous material has been removed from Silo 3 to justify downgrading of the Silo from Hazard Category 3 to Less Than Nuclear. Downgrading the Silo and deactivating the TSR to reflect the downgrading is an administrative issue and therefore will not increase the probability of accidents previously evaluated.	
2 NO	**Could the issue increase the consequences of an accident previously evaluated in applicable DOE-approved documented safety analysis?**
The safety analyses for Silo 3 are documented in the OU4 HAR, the Silo 3 PHAR and the Silo 3 Retrieval and Disposition N-HASP. The Evaluation Basis Accidents (EBAs) associated with the Silo 3 project from the PHAR all concern release of sufficient nuclear material to have the potential for significant localized consequences Sufficient hazardous material has been removed from Silo 3 to justify downgrading of the Silo from Hazard Category 3 to Less Than Nuclear. Downgrading the Silo and deactivating the TSR to reflect the downgrading is an administrative issue, which will not increase the consequence of accidents previously evaluated.	
3 NO	**Could the issue increase the probability of occurrence of a malfunction of equipment important to safety previously evaluated in applicable DOE-approved documented safety analysis?**
The Silo Containment Structure is identified in Chapter 4 of the Silo 3 PHAR as the only Safety-Significant Structure. Malfunction of the Silo Containment Structure is analyzed as SRF-8. Sufficient hazardous material has been removed from Silo 3 to justify downgrading of the Silo from Hazard Category 3 to Less Than Nuclear. Downgrading the Silo and deactivation the TSR to reflect the downgrading is an administrative issue, which will not increase the probability of malfunction of equipment important to safety.	
4 NO	**Could the issue increase the consequences of a malfunction of equipment important to safety previously evaluated in applicable DOE-approved documented safety analysis?**
The Silo Containment Structure is identified in Chapter 4 of the Silo 3 PHAR as the only Safety-Significant Structure. Malfunction of the Silo Containment Structure is analyzed as SRF-8. Sufficient hazardous material has been removed from Silo 3 to justify downgrading of the Silo from Hazard Category 3 to Less Than Nuclear. Downgrading the Silo and deactivating the TSR to reflect the downgrading is an administrative issue, which will not increase the consequences of malfunction of equipment important to safety.	

USQD/SE DOCUMENTATION SHEET(s)

Log No.: USQD-2006-0001

5 NO	**Could the issue create the possibility of an accident of a different type than any previously evaluated in applicable DOE-approved documented safety analysis?**

The safety analyses for Silo 3 are documented in the OU4 HAR, the Silo 3 PHAR and the Silo 3 Retrieval and Disposition N-HASP. The Evaluation Basis Accidents (EBAs) associated with the Silo 3 project from the PHAR all concern release of sufficient nuclear material to have the potential for significant localized consequences.

Sufficient hazardous material has been removed from Silo 3 to justify downgrading of the Silo from Hazard Category 3 to Less Than Nuclear. Downgrading the Silo and deactivating the TSR to reflect the downgrading is an administrative issue which will not create the possibility of an accident of a different type than any previously evaluated.

6 NO	**Could the issue create the possibility of a malfunction of equipment important to safety of a different type than any previously evaluated in applicable DOE-approved documented safety analysis?**

The Silo Containment Structure is identified in Chapter 4 of the Silo 3 PHAR as the only Safety-Significant Structure. Malfunction of the Silo Containment Structure is analyzed as SRF-8.

Sufficient hazardous material has been removed from Silo 3 to justify downgrading of the Silo from Hazard Category 3 to Less Than Nuclear. Downgrading the Silo and deactivating the TSR to reflect the downgrading is an administrative issue which will not create the possibility of a malfunction of equipment important to safety of a different type than any previously evaluated.

7 NO	**Does the issue reduce the margin of safety as defined in the basis for any Technical Safety Requirement (TSR) or DOE-approved Safety Basis Requirement (SBR)?**

The TSR for Silos does not include a "basis" section, and does not define a specific margin of safety for the Limiting Conditions of Operations (LCOs). However, it is understood that the margin of safety is the range of acceptance limits reviewed and approved by DOE. The analysis presented in Reference 6 demonstrates that sufficient hazardous material has been removed from Silo 3 to demonstrate that it is now Less Than Nuclear. Therefore, this issue does not reduce the margin of safety.