10356

CORRES. CONTROL
OUTGOING LTR. NO.

93-RF-3635

DIST.	LTR	ENC
NEDERO, R.L.	X	
NJA, A.		
RMAN, H.S.	X	
ANCH, D.B.		
RNIVAL, G.J.		
VIS, J.G.		
RRERA, D.W.		
NNI, B.J.		
RMAN, L.K.		
ALY, T.J.		
DAHL, T.G.	X	
BIG, J.G.		
KER, E.H.		
BY, W.A.		
ESTER, A.W.		
E, E.M.	X	
NN, H.P.		
RX, G.E.		
DONALD, M.M.	X	
KENNA, F.G.		
NTROSE, J.K.		
RGAN, R.V.	X	
TTER, G.L.		
ZUTO, V.M.		
EY, J.H.		
NDLIN, N.B.		
EPLER, R.L.		
EWART, D.L.		
LLIVAN, M.T.		
ANSON, E.R.		
KINSON, R.B.		
LIAMS, S.(ORC)		
SON, M.		
NE,		
ANSON,DR	X	
HL, AR	X	
TERWHITE,DG	X	

ACCEPTANCE REVIEW OF ROCKY FLATS REV 0 DRAFT B SAR
750 AND 904 PADS
TEMPORARY PONDCRETE AND SALTCRETE STORAGE FACILITIES

1. The primary safety and health requirements from applicable orders are not clearly identified. For example, what are the primary nuclear safety requirements to prevent or mitigate the consequences of credible accidents that result from the analyses required in DOE 5480.23? Also, what are the primary conduct of operations requirements based upon DOE 5480.19, and fire protection requirements based upon DOE 5480.7?

2. It is not at all clear what hazards, if any, will result from activities in the four Permacon enclosures within "selected tent structures," or whether more such enclosures will be used. Moreover, it is not clear whether accidents on adjacent site roads or in nearby buildings can cause accidental releases from waste stored on the pads. For example, could a credible vehicle accident on the adjacent site roads cause a release greater than that postulated for design basis accidents?

3. Pondcrete and saltcrete waste characteristics appear to be important to the establishment of a source term for accidents. Pondcrete stability has been an issue at Rocky Flats. It is not clear what will be done to verify that the accident assumptions remain conservative throughout the life of the facility.

4. The description of operations does not make it clear whether hazardous chemicals other than propane, such as carbon tetrachloride, are to be used or stored within the storage facilities.

5. Bases for release fractions for accidents do not appear to have been provided. Moreover, the bases for other accident assumptions contained in chapter 11 have apparently not been provided.

6. Beryllium is one of a number of significant chemicals identified in accident source terms. It is not clear that the use of EPRG values for non-threshold chemicals is appropriate, nor that administrative controls and/or engineered safety features are required to prevent or mitigate some accidents.

7. The SAR does not state life expectancy for these "temporary" facilities in order to evaluate time at risk.

8. If a single SAR is to be used for these two separate and distinct operations, each facility/activity must be assessed separately in those sections addressing facility description and operation; hazard analysis, inadvertent criticality; analysis of normal, and accident conditions; initial testing et al; derivation of TSRs; operational safety; emergency response; and any other topic which has different results because of location or activities. These two facilities should have separate SARs and TSRs to meet DOE 5480.23 and DOE 5480.22 requirements.

9. Average meteorology for accident conditions is unacceptable. The methodology in R.G. 1.145 must be used for DOE sites. TEDE, not CEDE, is to be used for dose consequences from accidents. RFO criteria for dose acceptance for radiological and toxicological consequences are not acceptable.

10. Description of operations and activities at the two facilities is inadequate. It does not provide a description of expected activities or frequency of such operations for each facility.

11. Bases for assumptions used in accident are not provided. The FMEA is not adequate for accident evaluation involving equipment and system failures or external events which cause failures.

12. Pu-238 (if present) consequences are greater than Pu-239 consequences because of the significant higher specific activity for Pu-238. Release fractions for materials could highlight this difference in postulated consequences if Pu-238 is present in the mix.