RMRS Rocky Mountain Remediation Services, L.L.C.
. . . protecting the environment
Rocky Flats Environmental Technology Site
P.O. Box 464
Golden, Colorado 80402-0464
Phone: (303) 966-7000

; RMRS Records

September 15, 1999

A. M. Parker
Vice President, Closure Projects Integration
Kaiser-Hill Company, L.L.C.
Building 111
Rocky Flats Environmental Technology Site

TRANSMITTAL OF REVISION 1 OF BUILDING 991 COMPLEX FSAR FOR DOE/RFFO APPROVAL – MW-119-99

Ref (a): D. C. Lowe ltr., AME:ABD:MP:99-02953, to A. M. Parker, Approval of the Building 991 Complex Final Safety Analysis Report, May 5, 1999.

Ref (b): D. C. Lowe ltr., AME:ABD:MP:99-03083, to A. M. Parker, Disapproval of Kaiser-Hill Proposed Resolutions of Technical Direction from the Rocky Flats Field Office Review Report on Building 991 Final Safety Analysis Report, August 31, 1999.

PURPOSE

The purpose of this letter is to transmit Revision 1 of the Building 991 Complex Final Safety Analysis Report (FSAR) (Attachment 1) that incorporates technical direction provided in References (a) and (b). This letter also transmits the revised safety analysis for the Building 991 Complex FSAR, Nuclear Safety Technical Report (NSTR) NSTR-011-98 (Attachment 2).

DISCUSSION

The Building 991 Complex FSAR and NSTR-011-98 were revised to incorporate technical direction provided in References (a) and (b) and technical direction provided in the August 19, 1999 meeting between the DOE/RFFO, Kaiser-Hill and RMRS. Attachment 3 provides a synopsis of RMRS' resolution of the technical direction provided by the DOE/RFFO. Attachment 4 provides a summary of the changes that were made to the FSAR and NSTR.

1. The Building 991 exhaust ventilation system was evaluated and determined adequate to provide filtered exhaust ventilation in all portions of Building 991 (except Room 166), the attached tunnels, and Buildings 996 and 998. As discussed in Chapter 2 of the FSAR, the High Efficiency Particulate Air (HEPA) filters in the Building 991 roof plenum are potentially degraded due to wetting from previous testing of the manual plenum deluge system. The Building 991 roof plenum has 96 HEPA filters. The cost of replacing these filters is estimated to be in excess of $50,000. This includes the cost of the filters, initial efficiency testing of the filters, labor costs (technicians, radiation protection, supervision), and the cost to screen the existing standard operating procedure against the updated Site-wide package for conducting this activity. The HEPA filters are not going to be replaced at this time because:

   - No credible accident scenarios identified that would cause the deluge system (automatic or manual) to be activated;

1/2

- No credible accident scenarios identified that would lead to plenum overpressure and degraded HEPA filter failure;
- No further degradation of the HEPA filters is anticipated as no further testing of the manual deluge system is planned;
- The installed filters recently passed the efficiency testing requirements; and
- The remaining life of the facility is limited.

2. As discussed in Chapter 2 of the FSAR and in the Technical Safety Requirements (TSRs), the testability of the heat detectors for the Building 991 roof plenum deluge system does not meet National Fire Protection Association (NFPA) requirements. Only 4 of the 9 heat detectors can currently be tested due to degraded wiring. The acceptability of this deficiency is justified in the bases of Limiting Condition for Operation (LCO) 3.3

3. The periodicity in the Criticality Safety Program has recently been changed to specify a "quarterly" verification of the location and arrangement of waste containers in the Building 991 Complex. Therefore, the periodicity for verifying Administrative Operating Limit (AOL) 6 was changed from "monthly" to "a periodicity as specified in the Criticality Safety Program" to accommodate the recent changes to the Criticality Safety Program. This item was not identified in the DOE/RFFO technical direction provided in References (a) and (b) and was not previously discussed with the DOE/RFFO or Kaiser-Hill.

RESPONSE REQUIREMENTS

It is requested that Kaiser-Hill transmit the Building 991 Complex FSAR to the DOE/RFFO for their approval. The changes made in Revision 1 of the Building 991 Complex FSAR are in the process of being implemented with an estimated implementation date of October 28, 1999. Achievement of this date is predicated on implementing the attached TSRs. Any changes beyond those proposed have the potential to impact the planned implementation date of the FSAR. Therefore, any additional technical direction received from Kaiser-Hill or the DOE/RFFO will be incorporated into the Building 991 Complex FSAR after Revision 1 has been fully implemented. Please direct any questions or concerns regarding this memorandum to Don Swanson at X7009 or Ken Baier at X2852.

Martin Wheeler
Vice President, Waste Operations
Rocky Mountain Remediation Services, L. L. C.

DRS:slu

Attachments: (4)
As Stated

cc:

K. B. Baier	-	ESSCO	J. C. Miller	-	Kaiser-Hill
S. K. Crowe	-	Kaiser-Hill	A. D. Rodgers	-	Kaiser-Hill
H. E. Gilpin	-	Kaiser-Hill	S. Walker-Lembke	-	TENERA
W. A. Harding	-	Kaiser-Hill			

2|2