



Department of Energy
National Nuclear Security Administration
Washington, DC 20585



August 15, 2008

MEMORANDUM FOR THE REVITALIZATION MANAGER,
LOS ALAMOS SITE OFFICE

FROM: ROBERT E. SMOLEN
DEPUTY ADMINISTRATOR
FOR DEFENSE PROGRAMS

SUBJECT: Approval of Request for Temporary Exemption from
Specific Fire Protection Requirements in DOE O 420.1B,
Facility Safety, for the Los Alamos National Laboratory
(LANL) Building Technical Area (TA)-55-4 Interim
Radiography Operations (IRO) Project

REFERENCES: (1) Memorandum from Winchell to Smolen, *Request for
Approval of Los Alamos National Laboratory Request for
Temporary Exemption (LANL-DOE-O-420.1B-EQ-2008-003)
to DOE O 420.1B Requirement - Lack of Automatic Sprinkler
Protection in LANL Building TA-55-4 Room 46E Tunnel and
46[F] Exit Stair Enclosure - Interim Radiography Operations
Project*, July 15, 2008

(2) Memorandum from Raferty to Crooks, *Request for
Temporary Equivalency Approval to DOE Order 420.1B for the
Los Alamos National Laboratory (LANL) Building TA-55-4
Room 46E Tunnel and Room 46F Exit Stair Enclosure
(LANL-DOE-0-420.1B-EQ-2008-003)*, June 18, 2008

Based on the evaluation (attached) conducted by staff from the Office of Safety (NA-171), I approve the subject exemption request. The Office of Health, Safety and Security (HSS) provided comments on the request, and the Central Technical Authority (CTA) has concurred on this exemption approval in separate correspondence.

SPECIAL CIRCUMSTANCES

An exemption is granted from DOE O 420.1B, Chapter II, ¶3.c(4), which requires automatic fire suppression throughout the facility, for TA-55, Building 4, Rooms 46E and 46F (of the IRO Project). The Los Alamos Site Office (LASO) submitted the exemption request to partially address a pre-start finding from the IRO Readiness Assessment. Approval of the request allows LASO to pursue startup of the IRO, and reduces safety, security, and mission risks associated with shipping pits between LANL and Lawrence Livermore National Laboratory.



SAFETY ASSURANCE

The following physical features and programmatic measures help to ensure a level of fire safety equivalent to the requirements in DOE O 420.1B:

- The egress tunnel is constructed of noncombustible, heavy reinforced concrete;
- The egress tunnel and the exit stair enclosure are separated from each other by a one-hour fire-rated barrier with a self-closing fire door. Penetrations in the barrier are properly sealed with approved fire-stop systems;
- The egress tunnel and stairway enclosure contain few ignition sources and minimal combustibles; and
- The tunnel will not be used for routine or extended storage of materials or equipment.

LASO recommended approval of the temporary exemption (Reference 1) based upon specific conditions of approval, including establishment and maintenance of a combustibles control program; and provision for automatic fire detection within the Room 46E egress tunnel. LASO staff will verify before startup that the combustibles control program is appropriate for the level of risk expected in Rooms 46E and 46F. LASO Facility Representative oversight activities help to ensure that the program is adequately implemented.

TERMS AND CONDITIONS

The following terms and conditions apply to this exemption:

1. The Terms and Conditions that LASO specified in Reference 1 apply;
2. LASO will clarify expectations for exemptions and equivalencies in the next revision of the LASO Fire Protection Program document; and
3. This temporary exemption is valid through the end of FY 2013. LASO will re-evaluate and, if appropriate, NNSA will reissue an exemption in fiscal year 2013.

The terms of this exemption will explicitly apply to the successor to the current management and operating contract (DE-AC52-06NA25396).

If you have any questions regarding this approval, please contact Mr. Gerald Talbot at 202-586/2181 or have your staff contact Ms. Sharon Steele at 202-586/9554.

Attachment

cc: W. Ostendorff, NA-2
D. Nichols, NA 2.1
W. Goodrum, NA-12
A. Williams, NA-50
J. O'Brien, HS-21
Docketing Clerk, HS