



## Department of Energy

Germantown, MD 20874-1290

April 26, 2000

Mr. Theodore S. Sherr  
Chief, Regulatory and International Safeguards Branch  
U.S. Nuclear Regulatory Commission  
Two White Flint North 8A33  
Washington, DC 20555

REFERENCE: Comments on March 2000 Draft Version of NUREG-1520,  
Chapter 3, "Integrated Safety Analysis"

Dear Mr. Sherr:

The U.S. Department of Energy has reviewed the reference document and offers an additional approach to satisfy the requirements of Sections 70.61, 70.62, 70.64, and 70.65 of the new proposed rule covering the Domestic Licensing of Special Nuclear Material. DOE believes that this additional approach is fully equivalent to the approach described in Appendix A of NUREG-1520, Chapter 3. The method which we propose is based on DOE-STD-3009, "Preparation Guide for U.S. Department of Energy Nonreactor Nuclear Facility Safety Analysis Reports". Additionally, DOE Order 420.1, "Facility Safety" is particularly useful for describing design requirements and criteria for new facilities and major modifications to existing facilities and we believe fully addresses Section 70.64 requirements.

This DOE approach was presented verbally at the NRC public meeting of April 18, 2000. The purpose of this letter is to follow up on our verbal request and to request that this option be added to Chapter 3.

Sincerely,

A handwritten signature in black ink that reads "Richard L. Black".

Richard L. Black, Director  
Office of Nuclear Safety  
Policy and Standards

cc: Drew Persinko, NRC  
Martin Virgilio, NRC  
R. Stark, EH-31

