James (Jimmy) Angelos
Transition Manager

FermiForward
5801 South Ellis Avenue, Suite 619
Chicago, IL 60637 USA

jimmy.angelos.ctr@amentum.com
jangelos@fnal.gov

November 6, 2024

Attn: Paul Golan
U. S. Department of Energy
PO Box 2000
Batavia, IL 60510-5011

Subject: 10 CFR 851 Pressure Variance

Mr. Golan,

Enclosed, please find Fermilab's letter regarding the 10 CFR 851 Pressure Safety Variance to reflect the change from FRA, LLC to FermiForward.

There are no changes in processes of implementation. The only required update to the Pressure Variance is to change the operating LLC from Fermi Research Alliance to FermiForward.

If you have any questions, or require additional information, please contact me at 803-295-3039. Thank you for all your support in implementing a successful transition.

James Angelos
FermiForward Transition Manager

Enclosures: as stated
CC: R. Scott
J. Kirby
M. Andrews
M. Bonkalski
PrimeContractManagement@fnal.gov

REVISION	0
DATE	11/6/24

APPROVED	REVIEWED
James Angelos	Mike Bonkalski
FFDG Transition Manager	FFDG Transition Lead, WBS Area
James Angelos	Mike Bonkalski

Lia Merminga
Director

Office of the Director
P.O. Box 500, MS 200
Kirk Road and Pine Street
Batavia, Illinois 60510-5011
USA

Office: 630.840.3211
merminga@fnal.gov

November 4, 2024

Mr. Roger Snyder
Site Office Manager
Fermi Site Office
U. S. Department of Energy
P. O. Box 2000
M/S 118
Batavia, Illinois 60510-5011
U. S. A.

Dear Mr. Snyder,

Fermi National Accelerator Laboratory (Fermilab) is upgrading its accelerator complex to provide a minimum one-megawatt proton beam to develop and support a world-class neutrino program. Fermi Forward Discovery Group (FermiForward), as the new M&O contractor, with the DOE, continues to foster the international collaboration and partnerships required to support the design and construction of this world-class science laboratory.

For this type of world-class global science, specialized/custom pressure equipment for superconducting accelerators and one-of-a-kind experimental detectors is required. Development of such equipment and related actions with international partners necessitates the use of international design and safety codes. Title 10 Code Federal Regulation (CFR) Part 851 requires adherence to the set of codes under American Society of Mechanical Engineers (ASME) which includes the Boiler and Pressure Vessel Code (BPVC) and ASME B31 codes for pressure piping and does not recognize the use of international codes in the design and construction of pressure equipment. FermiForward therefore requests a permanent variance from portions of 10 CFR Part 851, as reviewed and recommended by the DOE Office of Environment, Health, Safety, and Security to the Under Secretary for Science and Innovation, dated May 16, 2024. This variance application seeks approval for Fermilab's process to ensure pressure equipment constructed to international codes is As Safe and Healthful As (ASAHA) equipment constructed to the ASME codes.

The attached variance is submitted for your approval. Please reach out to Marc Clay (mclay@fnal.gov) to address any questions or concerns.

Sincerely,

Lia Merminga

Lia Merminga
Director
Office of the Director

cc:	B. Fleming	M. Clay	G. Stephens	M. Andrews
	J. Scott	J. Kerby	J. Niehoff	J. Sawyer
	A. Bihary	M. Kaducak	R. Ray	K. Vetter