



Department of Energy

Washington, DC 20585

December 6, 2000

Mr. John T. Conway
Chairman
Defense Nuclear Facilities
Safety Board
625 Indiana Avenue, NW
Suite 700
Washington, D.C. 20004

Dear Chairman:

The Hanford Site Manager, Keith Klein, and I have been in frequent contact throughout the series of Operational Readiness Reviews (ORRs) prior to our authorizing the start of fuel removal operations from the K Basins. We are aware that deficiencies in the conduct of operations and radiological controls practices have been noted during these reviews and agree that these deficiencies must be addressed before commencing operations.

RL has been working closely with the contractor to assure that the resolution of these issues is timely and effective. As Mr. Klein, his team, and I discussed with you during the December 6 videoconference, RL believes that the contractor's corrective action plan and actions in response to the findings of the DOE ORR team in these areas are appropriate and that the corrective actions are consistent with the recommendations of your letter of December 5, 2000. Specifically, the contractor will (among other actions):

- Establish a Senior Supervisory Watch for all critical Multi-Canister Overpack (MCO) activities which are defined as those MCO and MCO support activities that require a QA signature. This watch will be maintained until contractor management and RL jointly agree it is no longer needed;
- Brief all operations crews on the specifics of the conduct of operations issues prior to assuming shift duties;
- Enhance pre-shift briefings to emphasize execution of key procedural steps; and
- Revise procedures to clarify requirements and enhance compliance with technical safety requirements in the assembly of the MCO shield plugs.



Mr. Klein has assured me that oversight by qualified RL facility representatives will be provided during MCO handling and processing to ensure safe operation of the systems and facilities. This oversight will remain in effect until Fluor self-certifies it is no longer needed, and an independent assessment conducted by RL and approved by Mr. Klein confirms that Fluor is able to operate safely and proficiently without such support. In addition, the initial operations will be with very low risk spent nuclear fuel and will be limited to two MCOs. The conclusion of that operation will be used as a checkpoint prior to removing additional fuel. Mr. Klein will separately be sending you the close-out plan you requested.

Sincerely,



Carolyn L. Huntoon
Assistant Secretary for
Environmental Management

cc: Keith Klein, RL
Mark Whitaker, S-3.1
Dr. David Michaels, EH-1