

**[DOE LETTERHEAD]**

December 16, 1992

The Honorable John T. Conway  
Chairman  
Defense Nuclear Facilities Safety Board  
625 Indiana Avenue, N.W., Suite 700  
Washington, D.C. 20004

Dear Mr. Conway:

On August 17, 1992, the Defense Nuclear Facilities Safety Board issued Recommendation 92-5, Discipline of Operations in a Changing Defense Nuclear Facilities Complex, to the Department of Energy. I have reviewed the three parts of Recommendation 92-5 and accept these recommendations as addressed in the enclosed Implementation Plan for Recommendation 92-5.

Sincerely,

***James D. Watkins***  
***Admiral, U.S. Navy (Retired)***

Enclosure

IMPLEMENTATION PLAN FOR BOARD RECOMMENDATION 92-5  
DISCIPLINE OF OPERATIONS IN A CHANGING  
DEFENSE NUCLEAR FACILITIES COMPLEX

There have been major mission changes in the defense nuclear complex, and further changes will continue to take place as international commitments and agreements affecting the nuclear defense activities of the Department of Energy (DOE) further evolve. A period of transition will take place. Some facilities will be put in a standby condition. Others will be permanently shut down and dismantled after appropriate attention to cleanup. These changes will bring new challenges and a need for continued improvement in discipline of operations to ensure safety of the public including the workers. The Department has made significant progress through inaugurating the cultural changes initiated by the Secretary and, in many cases, has instituted safety requirements exceeding those currently demanded of the civilian nuclear industry.

In issuing his safety policy in SEN-35-91, the Secretary stated safety goals applicable to all defense nuclear facilities of the DOE. As such, the Department will not abandon any facility without having conducted the necessary activities to ensure public and worker safety. At the same time, DOE intends to ensure that those facilities to be placed in standby for possible reactivation and return to service can be reactivated, if needed, in a cost-effective and safe manner.

The first recommendation of 92-5 relates to "defense nuclear facilities scheduled for long term continued programmatic defense operations or for other long term uses, such as in cleanup of radioactive contamination or in storage of nuclear waste or other nuclear material from programmatic defense operations." DOE Order 5480.19 on conduct of operations provides the guidelines to achieve the formality and discipline associated with excellence in operations. The Department intends to implement this order in a graded manner commensurate with the health and safety risks associated with the particular facility. All activities will be conducted in a formal and disciplined manner which is consistent with the guidelines for conduct of operations and which takes into account the actual activities at that facility. However, under the graded approach, the conduct of operations program for long term storage of special nuclear material or low level waste would differ from the intensive program required at a defense production reactor. The concept of a graded approach has been discussed previously with the Board in connection with DOE Recommendation 90-2 Standards Compliance Implementation Plan and is being used at facilities such as Rocky Flats Building 559, the Waste Isolation Pilot Plant, Savannah River Site's K-Reactor and Replacement Tritium Facility, and Los Alamos TA-55.

The second recommendation of 92-5 relates to Operational Readiness Reviews(ORRs). This section of Recommendation 92-5 is superseded and subsumed in Defense Nuclear Facilities Safety Board Recommendation 92-6, "Operational Readiness Reviews." The "graded approach" with respect to ORRs will be defined in the Implementation Plan for Recommendation 92-6.

The third recommendation of 92-5 discusses facilities designated for various other future modes of use such as standby. The intent is to place those facilities that may later resume some degree of production in an appropriate state of readiness to include a conduct of operations program pertinent to facility aspects and programs needed to support future activities. Specific attributes of

such a program include the following items:

- o Decontamination will be pursued to the point where a future operating staff can enter the facility and make use of it without unnecessary exposure to radiological hazards. Radiological hazardous and toxic contaminated areas will be stabilized, recorded, and posted. Facility stabilization and custodial control will be sufficiently complete that events such as fires, electrical power losses, and anticipated natural phenomena (earthquakes, wind, storms, and floods) would not lead to undue risk to the public.
- o In the case of waste storage tanks, the ultimate disposition (disassembly or reuse) of tanks will be the determining factor for actions to be completed. As a minimum, periodic tank inspections will be conducted to ensure all tanks are placed and maintained in proper condition (e.g., inert blanket, vented, drained, purged) and the status of the tanks identified in a master log.
- o Configuration and process descriptions will be maintained consistent with future mission potential. For example, for facilities for which future operation is very likely, configuration drawings, system design descriptions, process descriptions, and safety analyses will be updated so that a future operating staff will have the ability to initiate facility activation operations with adequate freedom from the possibility of accidents caused by incomplete or inaccurate understanding of the state of the facility and its proper use.

In cases where the potential exists for facility resumption in the near term (2-5 years), training programs and manuals will also be prepared as part of this process of preparation for standby status with sufficient depth to permit indoctrination and qualification of new operating and maintenance personnel to take over their assigned functions. These will also instruct the personnel in the radiological and other safety aspects of the functions they are to assume.

Accomplishment of these activities and objectives will be confirmed by DOE line management and, where applicable, by other Departmental organizations such as the Office of Nuclear Safety and the Office of Environment, Safety and Health.

As part of the Department's budgetary process, each Program Secretarial Officer (PSO) continuously reviews plans for future use of the facilities under his jurisdiction. As changes take place in mission objectives and as the reconfiguration plan for the new defense nuclear complex matures, one can reasonably expect changes in plans for usage of existing facilities. Periodically, and at least annually, the PSOs will inform the Board in writing on the revised status of defense nuclear facilities and on plans for their future use, including a discussion on the ways which the objectives of this implementation plan are being accomplished.

This recommendation, by its general nature and broad purpose, does not allow for development of a detailed and scheduled implementation plan that could be accomplished on a one-time basis in a specified time period. By accepting the principles of Recommendation 92-5 and by its commitment to periodically inform the Board of ongoing efforts at specific facilities, the Department meets the spirit and intent of Recommendation 92-5.

TB95JN30.925, DOE's 1995 Annual Report for Rec. 92-5

Attachments may be obtained by calling (202) 586-1857. [Original, 67 Pages]