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## DEFENSE NUCLEAR FACILITIES SAFETY BOARD

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March 12, 1993

The Honorable Hazel R. O'Leary  
Secretary of Energy  
1000 Independence Avenue, S.W.  
Washington, DC 20585

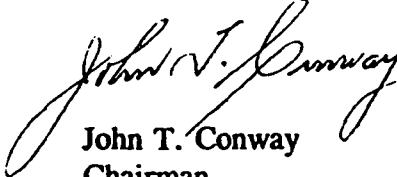
Dear Madam Secretary:

The Board has reviewed the Department of Energy Implementation Plan, Revision 3, December 1992, submitted by Secretary Watkins in response to Recommendation 90-2. We find that this Plan represents a significant step forward and is a reasonable broad basis for proceeding. However, the Board has identified a number of details shown in the enclosure that still need to be addressed. Provided that these are resolved to the Board's satisfaction, the Plan will be acceptable.

The Board is open to continued staff interchanges to resolve these matters and a variety of other editorial details that would contribute to the clarity of the Plan.

The Board looks forward to DOE's successful implementation of the results of this important recommendation.

Sincerely,

  
John T. Conway  
Chairman

Enclosure

c: Mark Whittaker, Acting DR-1

**DNFSB Comments on 90-2 Implementation Plan, Revision 3**

1. In paragraphs 1.4(3) and 4.4 (pages 7 and 15), DP commits to the assessment of compliance with the implementation of DOE Orders for 'operational' facilities without waiting until the Site/Facility RIDs are developed. EM should commit to a similar position for 'operational' facilities under its cognizance.
2. Defense nuclear facilities have been divided (Section 3.2, page 9) into four categories for purposes of 90-2 Orders/standards review. These do not include facilities which are in design and construction, although the methodology (section 4.1, page 11) describes the division of ES&H topics into areas essential to design and construction. Facility categories for design and for construction should be included (examples include the Hanford TWRS and the new waste tanks at Hanford).
3. The designation of the Hanford Tank Farms as 'mission transitional' facilities (EM Plan, section 2.3) rather than 'operational' facilities merits further consideration. A case can be made that the storage function of these tanks still exists and represents an operational mode that will continue until waste removal is accomplished.
4. The compliance assessment effort (section 4.5, DOE Implementation Plan, section 5.0, EM Plan) suggest that the development of site and facility RIDs are limited to requirements for contractor operations only. To be responsive to Recommendation 90-2, RIDs should include requirements that are the responsibility of DOE Headquarters and Field Offices.
5. The proposed schedule for completing eight priority EM RIDs is shown in Figure 7. This schedule indicates that compliance assessment for priority facilities will not be completed until the fourth quarter 1993. Thus, the startup of the DWPF and the New Waste Calciner Facility is planned before the compliance review of applicable Orders will have been completed. This EM approach is inconsistent with the DOE General Plan (section 4.4) where it is stated that DP 'operational' facilities will be assessed for compliance with Orders without waiting until the final site and facility RIDs are developed. See comment 1., above.
6. Order compliance assessments (DP Plan, section 4.8) do not include self-assessments by DOE Headquarters or Headquarter assessments of DOE Field Offices. Order compliance assessments should include assessments of DOE performance with respect to meeting its requirements. Facility specific schedules and milestones should be shown for both DP and EM facilities.

7. Schedules for compliance self-assessments shown in the DP Plan (Figure 2) are incomplete in several respects. Examples include schedules for facilities at LANL for which Requests for Facility Approvals are shown as 'TBD', and schedules for facility assessments at SRS which are not shown.
8. The Implementation Plan has been structured into several parts, one applicable to facilities under DP cognizance, and one applicable to facilities under EM cognizance. It is important that the individual approaches presented result in RIDs that are formatted to be as consistent as possible to facilitate the transition of facilities from one organizational unit to another. For example, requirement groupings into functional areas should be the same for EM and DP facilities. (See EM Plan, section 1.3)
9. The proposed schedules for RIDs shown in the DP Plan (Figure 1) are not shown for any particular facility. Facility specific RID development schedules and milestones should be shown for DP facilities.
10. Several commitments are contained in the body of the Implementation Plan. It would be valuable if the final commitment dates for these items, such as the "Adequacy Report on Orders of Interest to the Defense Nuclear Facilities Safety Board", ( section 4.4, page 16, DOE General Plan) were either included in the first quarterly report or in a separate letter from DOE.
11. Regular quarterly progress reports to the Board by DP and EM, as appropriate, should be specified in the Implementation Plan. These reports should identify facility-specific accomplishments during the reporting period and current problems being encountered. It would also be helpful if the schedules for 90-2 implementation at sites and facilities contained greater detail and clarity than is shown in revision 3 of the Implementation Plan. Schedules provided as part of the quarterly status reports could contain more detail on the status and milestones for the development of RIDs and for site and facility compliance assessment activities.
12. Regular quarterly progress reports to the Board by oversight organizations should be specified in the Implementation Plan. These reports should identify specific actions that have been taken by them to strengthen implementation and improvements made as a result of those actions, together with current problems being encountered.
13. Specific provision should be made in the Implementation Plan for assuring that the requirements of DOE Order 5700.6C, "Quality Assurance", are complied with, especially as regards Criterion 2 and Criterion 10 for both DOE and contractor personnel.