DEFENSE NUCLEAR FACILITIES SAFETY BOARD

January 25, 2002

TO: K. Fortenberry, Technical Director

FROM: D. Grover and M. Sautman, Hanford Site Representatives **SUBJ:** Activity Report for the Week Ending January 25, 2002

Both Site Representatives were out of the office due to illness for much of this week. Roger Zavadoski and David Boyd (outside expert) were on-site to observe the Phase II Assessment.

T-Plant: Messrs. Stokes and Sautman had a discussion with the Richland Deputy Manager, Central Plateau Assistant Manager (AM), and Safety and Engineering AM regarding the recovery from the terminated DOE Operational Readiness Review (ORR) for removing Shippingport fuel assemblies from T Plant. The DOE ORR termination letter directed Fluor Hanford to revise their Plan of Action and Implementation Plan and stated that restart of the DOE ORR would be dependent on the submittal of a revised declaration of readiness. However, there were still strong differences of opinion within the contractor and DOE organizations whether a second contractor ORR was required despite this guidance and a requirement in Richland's own procedures to repeat the contractor ORR under these circumstances. With this issue still unresolved. Fluor Hanford started an Independent Assessment of Readiness this week with DOE overseeing the review. The staff initiated discussions because of concerns with the purpose of this review and how it complied with DOE orders and standards. The staff was surprised that this contractor independent assessment was allowed to begin when DOE line management could not specify whether readiness had been declared yet, whether this was the line management or independent review, and whether this was to take the place of a contractor ORR. Complicating matters is the fact that Fluor Hanford is still trying to close hundreds of corrective actions to address DOE's identification of a negative performance trend for corrective action management and contractor readiness verification. Unfortunately, the question of Fluor Hanford's ability to conduct readiness reviews pending closure of these corrective actions was not addressed. The staff did not agree with arguments that uncertainties in FH's ability to conduct adequate ORR's justified the use of "independent assessments" with "action plans" (vice plans of action) in place of the process described in the DOE orders and standards. The staff believes that the path forward should still be contractor line management assessment of readiness, contractor declaration of readiness, contractor ORR, DOE declaration of readiness, and performance of the DOE ORR. The Site Rep was later informed that readiness has not been declared yet and reportedly will not be until mid-February. In light of this, the results of the independent assessment could be input for the contractor's declaration of readiness, but would not be a suitable substitute for a contractor ORR which assesses readiness after readiness has been declared. The DOE Deputy Manager is to make a decision shortly. (III-A)

<u>Plutonium Finishing Plant (PFP)</u>: The Recommendation 2000-2 Phase II Assessment of the PFP confinement ventilation system began. No serious equipment degradation issues have been identified so far, although issues are being pursued regarding system boundaries and interfaces, training and qualification of systems engineers, and safety classification of components. (I-C)

cc: Board Members