

## DEFENSE NUCLEAR FACILITIES SAFETY BOARD

June 11, 1999

**TO:** G. W. Cunningham, Technical Director

**FROM:** R. Arcaro, & D. G. Ogg, Hanford Site Representatives

**SUBJ:** Activity Report for the Week Ending June 11, 1999

Staff member A. Hadjian and outside expert J. Stevenson were on site Thursday to review the Cask Loadout System redesign effort.

A. Tank Farms Integrated Safety Management System (ISMS): The Department of Energy (DOE) Office of River Protection completed its line assessment of Tank Farms ISMS in preparation for an independent Phase II Assessment scheduled for later this year. Primary among the findings was the incomplete implementation of the Automated Job Hazards Analysis (AJHA); however, it should be noted that where the AJHA is not fully implemented, alternative means of hazards analyses are performed. In general, the findings are not of a nature that would prevent successful completion of a Phase II assessment this year.

B. Spent Nuclear Fuel Project (SNFP): On June 10, Messrs. Ogg and Arcaro met with senior managers from the DOE Richland Operations Office (RL) and Fluor Daniel Hanford (FDH) as part of an FDH Process Improvement Program for the SNFP. The site representatives (site reps) reiterated concerns that have been published DNFSB/TECH-17, site rep weekly reports, and staff Issue Reports. Additionally, the site reps expressed a concern for the continuing trend of schedule slippage within the project and the continued lack of an effective corrective action program.

C. Radiological Protection Plan Implementation: In accordance with 10 CFR 835, *Occupational Radiation Protection*, "DOE activities shall be conducted in accordance with a documented radiation protection program (RPP) . . ." In order to "flow-down" the requirements of Part 835 and provide a detailed framework for contractor RPPs, DOE-RL is revising the Hanford Site Radiological Control Manual (HSRCM). In addition, DOE Headquarters is developing a RADCON Standard (RCS) as a companion, guidance document to Part 835. Two difficulties have become apparent:

- 1) Several inconsistencies exist between Part 835 and the new RCS where requirements in Part 835 are rewritten as "should" statements in the RCS. Contractors could interpret a "should" statement in the RCS as an excuse to deviate from the requirements of Part 835 without obtaining an exemption.
- 2) Currently, there is no consensus among DOE-RL Assistant Managers regarding the continued inclusion of the HSRCM as a contractual requirement.

The Site Representatives believe that unless these issues are addressed by DOE HQ and the Site Manager, the potential exists for serious confusion and inconsistency in the development, review and approval of contractor RPPs.

cc: Board members