## DEFENSE NUCLEAR FACILITIES SAFETY BOARD

February 21, 1997

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

**FROM:** P.F. Gubanc & D.G. Ogg, Hanford Site Representatives **SUBJECT:** Activity Report for Week Ending February 21, 1997

Staff members Burnfield, DeLoach, and Troan were on site during the week to review Bechtel radiological controls and work control processes. Paul Gubanc was on leave all week.

A. Canister Storage Building (CSB) Design and Construction: On Friday, February 14th, the CSB constructor, Mowat, placed concrete for the basemet of the Hot Conditioning System pits, adjoining the third vault of the CSB. Then, on the 20th, Mowat placed concrete for the deck of the third vault and the first lift of the vault one ventilation intake structure. The DOE-RL construction project manager reported that Mowat experienced no difficulties during these concrete placements.

B. **Bechtel Nuclear Safety:** In response to direction from the Office of the Assistant Manager for Environmental Restoration (AME), Bechtel Hanford, Inc. (BHI) has conducted or plans to conduct preliminary hazard categorizations (PHC) for all above ground structures that contain a radionuclide inventory. This effort will provide a threshold criterion for determining AME review and approval of facility safety documentation (the criterion being a PHC of Nuclear Category 1, 2, or 3).

BHI reported preliminary results of this effort in a letter to DOE-RL dated January 31, 1997. For 22 facilities and activities for which a PHC is complete, BHI reported 15 Industrial, seven Radiological, and zero Nuclear facilities/activities. There remain over 200 facilities/activities yet to be categorized, but BHI anticipates the results of PHC to be: two Nuclear Category 2 facilities, sixteen Nuclear Category 3 facilities, over thirty Radiological facilities/activities, and the remainder, Industrial facilities/activities. Facilities in transition such as PUREX and B-Plant are not yet included in the BHI list.

C. **AME Technical Management:** In February 1996, DOE-RL issued the *Richland Technical Management Plan for the Environmental Restoration Contract* (TMP) in response to the Board's Recommendation 93-4. The TMP identifies the rules, standards and orders that apply to DOE in its mission of providing technical management of, and direction to the Environmental Restoration Contractor (Bechtel Hanford, Inc.). The TMP also defines roles and responsibilities for DOE-RL relative to this mission, and provides compliance assurance plans from which DOE- RL personnel can coordinate and schedule their required reviews, surveillances and assessments. DOE-RL, DOE-HQ, and the Board's staff expended a significant amount of time and effort to ensure that the TMP would be a useful guidance document for the AME organization.

AME began implementation of the TMP in February 1996 by issuing an integrated schedule for assessments to be conducted by DOE-RL personnel (Appendix D of the TMP). While a few of these assessments were conducted, many were not, and the schedule was not maintained beyond August 1996. Currently, the AME facility representatives maintain a formal assessment schedule through the Facility Representative program, but this program does not satisfy the guidance of the TMP nor does it provide clear direction to AME project managers for conducting their required reviews and assessments.

Guidance in the TMP suggests that the TMP be updated annually to incorporate revisions to rules, standards and DOE Orders and other changes. AME management chose not to update the TMP, but instead plans to develop a Project Management Manual that will provide direction to project managers. This manual has been under development for over one year and is not issued. The site representative office will review the manual when it becomes available.

cc: Board Members