DEFENSE NUCLEAR FACILITIES SAFETY BOARD

April 11, 2003

TO: K. Fortenberry, Technical Director

FROM: D. Grover and M. Sautman, Hanford Site Representatives **SUBJ:** Activity Report for the Week Ending April 11, 2003

Waste Treatment Plant (WTP): Bechtel National Inc. (BNI) submitted a nearly 550 page proposal to delete approximately 60% of the safety criteria, reduce the detail in most of the remaining ones, and delete 10 appendices from the Safety Requirements Document (SRD). In order to reduce the number of Important to Safety controls needed to provide defense-in-depth, BNI and the Office of River Protection (ORP) are working on a proposal to eliminate the requirement for 2+ physical barriers to protect facility workers for the 2 most severe accident classes and make the single failure criterion optional for safety significant controls. The Site Rep also passed on a number of concerns to the ORP with the latest version of the Authorization Basis Maintenance Process. The draft process does <u>not</u>: a) require ORP approval of changes that create new design basis events (DBE), worsen the frequency or consequence category of an analyzed DBE, or negatively affects safety class/significant controls; b) require prior ORP approval of deviations/ changes that would be irreversible or prohibitively expensive to rescind; c) define the criteria for limited case deviations from SRD implementing codes and standards; or d) require ORP approval of changes to implementing codes and standards that are DOE Orders or standards.

BNI lifted their Quality Stand Down on concrete placements Monday after conducting training classes and adding more signatures to the concrete pour card. Considering the types of problems being seen with the pour cards, the Site Rep was skeptical that adding more signatures would fix the problems. Two days later, ORP identified a missing design change notice on an approved pour card which led to BNI taking action to make it clear they will hold people accountable for their actions. ORP is also questioning why ORP inspectors are finding these quality issues rather than BNI personnel. BNI intends to start a root cause analysis next week. Although BNI thought they were successful in rearranging equipment to eliminate spacing issues in the High-Level Waste facility, BNI informed ORP this week that they want to adjust the heights of 5 floors (total height gain of 7'). In order to accommodate the weight of wet concrete floors during placement, additional shoring would need to be placed on the 2 floors below them. Not only was this costly, but it affected the installation of equipment on the lower floors. There were also concerns that the proposed equipment rearrangements might not leave enough margin for future changes. The height increase will require the facility's seismic assessment to be reanalyzed. (I-C)

Spent Nuclear Fuel Project (SNFP): The Board's staff discussed actions taken by DOE Richland (RL) in response to the Board letter of March 7, 2003, on operational readiness reviews (ORR) at Hanford. DOE-RL has modified its procedures to require training in the conduct of ORR for future ORR team members. The process of developing ORR implementation plans was modified to consider the review approach of the contractor ORR team and contractor ORR findings. One area of continuing concern is the use of senior advisors. RL plans to use individuals without significant experience in determination of operational readiness to act more as a liaison with senior management rather than advising the team leader and overseeing review activities. (III-A)