DEFENSE NUCLEAR FACILITIES SAFETY BOARD

August 1, 2003

TO: K. Fortenberry, Technical Director

FROM: D. Grover and M. Sautman, Hanford Site Representatives **SUBJ:** Activity Report for the Week Ending August 1, 2003

<u>Tank Farms:</u> After the Site Rep met with CH2M Hill Hanford Group (CHG) and Department of Energy (DOE) personnel to discuss concerns with the revised Technical Safety Requirements, the administrative controls for flammable gas, waste transfers, and installed instrumentation were rewritten. Much of the specificity in these controls has been returned, in particular the use of process control plans for activities that can induce gas release events. Furthermore, ventilation system operability was redefined as meaning operating with the exception of outages shorter than 24 hours. One still unresolved issue is that credited tank instrumentation is being covered by an administrative control in lieu of designating them as safety significant.

In response to Site Rep observations on an Enhanced Work Planning session, CHG is providing additional training and mentoring to ensure expectations are met. In addition, a standard agenda and checklist is being developed to improve consistency and thoroughness. (I-C)

Waste Treatment Plant (WTP): A staff review of commissioning plans found a high degree of operations involvement in the WTP design and planning. While the contract states that DOE Order 425.1B compliant Operational Readiness Reviews (ORR) will be conducted for hot commissioning, further contract guidance and assumptions built into the schedules indicate the "phased ORR" will likely consist of a series of small reviews conducted over ~16 months during cold commissioning. The approach described by Bechtel and DOE blurs the lines between management self-assessments, contractor ORR, and DOE ORR and does not include the traditional interpretation of declaring readiness. The strategy that is being developed has the strong appearance of a process to achieve readiness, not independently verify readiness. (I-C)

Spent Nuclear Fuel Project (SNFP): The project determined that the testing planned to develop AB controls for shipment of sludge discussed in last week's activity report would be problematic to implement. As a result this week the project has decided to pursue a strategy to provide forced ventilation for the sludge container to eliminate hydrogen buildup rather than purging the cask to eliminate oxygen. The project has prepared a draft schedule for the implementation of this strategy which delays the first shipment until late November. The project is anticipating that the removal of the time consuming purge cycles at the K-East Basin and T Plant will allow the completion milestone to be met. However, the need for revised permits are still being evaluated and could lead to additional delays. (I-C)

<u>Cesium and Strontium Capsules:</u> The proposed dry storage facility location for the capsules is in close proximity to the current storage location, the Waste Encapsulation and Storage Facility (WESF) and B plant. Discussions with the project manager have raised concern that decision on the location did not consider life cycle impacts such as interferences with the decommissioning and demolition of the B Plant and WESF. (I-C)