May 4, 1990

Honorable James D. Watkins
Secretary of Energy
Washington, DC 20585

Dear Mr. Secretary:

On May 3, 1990, the Defense Nuclear Facilities Safety Board, in accordance with Section 312(5) of Public Law 100-456, approved a recommendation which is enclosed for your consideration.

Section 315(A) of Public Law 100-456 requires the Board, after receipt by you, to promptly make this recommendation available to the public in the Department of Energy's regional public reading rooms. Please arrange to have this recommendation placed on file in your regional public reading rooms as soon as possible.

The Board will publish this recommendation in the Federal Register.

You will note that the Board has recommended that a readiness review be carried out at Rocky Flats prior to resumption of operations. When the composition of the group to conduct this review has been established and a written plan and scope for carrying out the review has been developed, the Board wishes to be informed. We also request that the Board be provided with the results of the review before resumption of operations is authorized.

Sincerely,

Enclosure
Examination of records of tests and calibration of safety systems and other instruments monitoring Limiting Conditions of Operation or that satisfy Operating Safety Requirements.

Verification that all plant changes including modifications of vital safety systems and plutonium processing workstations have been reviewed for potential impact on procedures, training and requalification, and that training and requalification have been done using the revised procedures.

Examination of each building’s Final Safety Analysis Report to ensure that the description of the plant and procedures and the accident analysis are consistent with the plant as affected by safety related modifications made during the outages period.

John T. Conway, Chairman
RECOMMENDATION TO THE SECRETARY OF ENERGY
pursuant to Section 312(5) of the
Atomic Energy Act of 1954, as amended.

Dated: May 3, 1990

In several visits to Rocky Flats, the Board and its experts have reviewed aspects of
operations and activities. These reviews have been directed toward ensuring adequate
protection of public health and safety and concern matters that have an important
bearing on resumption of plutonium processing operations. The Board's reviews have
included such operations-related activities as reconstruction of drawings of systems
important to safety ("red-lining"), development and validation of plant operating
procedures, and training and requalification of plant operators in plutonium processing
operations.

Several of these contractor activities, which would ordinarily be conducted in sequential
manner, are being carried forward concurrently. Because of the interdependence of
these activities, the Board has not yet been able to predict their adequacy at the time of
proposed resumption of plutonium processing operations. For example, at the time of
our most recent visit, no training lesson plans had been approved and less than one-third
had been submitted for review. Training materials that were reviewed contained
extensive on-the-job examination and performance requirements leading to
requalification. This process will be time-consuming.

Usual practice in restarting a nuclear facility after an extended outage is the conduct of a
comprehensive operational readiness review. Aware of the benefits of this practice in
ensuring that public health and safety are adequately protected, and in view of the
situation, the Board recommends that such a readiness review be carried out at
Rocky Flats prior to resumption of operations.

We recommend that the group constituted to carry out the readiness review be
composed of experienced individuals and that their backgrounds collectively include all
important facets of the unique operations involved. We recommend the review include,
but not be limited to, the following items:

- Independent assessment of the adequacy and correctness of process and
  utility systems operating procedures. Consistent with the contractor's
  operating philosophy, these procedures should be in sufficient detail to
  permit the use of the "procedural compliance" concept.

- Assessment of the level of knowledge achieved during operator
  requalification as evidenced by review of examination questions and
  examination results, and by selective oral examinations of operators by
  members of the review group.
DEFENSE NUCLEAR FACILITIES SAFETY BOARD

SUMMARY: The Defense Nuclear Facilities Safety Board has made recommendations to the Secretary of Energy pursuant to 42 U.S.C. 2266a, concerning operational readiness at DOE’s Rocky Flats Plant, CO. The Board requests public comments on these recommendations.
DATES: Comments, data, views, or arguments concerning the recommendations are due on or before June 11, 1990.

ADDRESSES: Send comments, data, views, or arguments concerning the recommendations to: Defense Nuclear Facilities Safety Board, 600 E Street, NW., Suite 675, Washington, DC 20004.

FOR FURTHER INFORMATION CONTACT: Kenneth M. Pusateri, at the address above or telephone 202/376-5063, (FTS) 376-5063.


Kenneth M. Pusateri,
General Manager

Operational Readiness Review at the Department of Energy's Rocky Flats Plant, CO


In several visits to Rocky Flats, the Board and its experts have reviewed aspects of operations and activities. These reviews have been directed toward ensuring adequate protection of public health and safety and concerns that have important bearing on resumption of plutonium processing operations. The Board's reviews have included such operations-related activities as construction of drawings of systems important to safety ("red-lining"); development and validation of plant operating procedures, and training and resumption of plutonium processing operations.

Several of these contractor activities, which would ordinarily be conducted in a sequential manner, are being carried forward concurrently. Because of the interdependence of these activities, the Board has not yet been able to predict their adequacy at the time of proposed resumption of plutonium processing operations. For example, at the time of our most recent visit, no training lesson plans had been approved and less than one-third had been completed for review. Training materials that were reviewed contained extensive off-the-job examination and performance requirements leading to resumption. This process will be time-consuming.

Usual practice in restarting a nuclear facility after an extended outage is the conduct of a comprehensive operational readiness review. Aware of the benefits of this practice in ensuring that public health and safety are adequately protected, and in view of the situation, the Board recommends that such a readiness review be carried out at Rocky Flats prior to resumption of operations. We recommend that the group constituted to carry out the readiness review be composed of experienced individuals and that their backgrounds collectively include all important facets of the unique operations involved. We recommend the review include, but not be limited to, the following items:

- Independent assessment of the adequacy and correctness of systems operating procedures. Consistent with the contractor's operating philosophy, these procedures should be subject to the "procedural compliance" concept.
- Assessment of the level of knowledge achieved during operator resumption as evidenced by review of examination questions and examination results, and by selective oral examination of operators by members of the review group.
- Examination of records of tests and calibration of safety systems and other instruments monitoring Limiting Conditions of Operation or that satisfy Operating Safety Requirements.
- Verification that all plant changes including modifications of vital safety systems and plutonium processing workstations have been reviewed for potential impact on procedures, training and resumption, and that training and resumption have been done using the revised procedures.
- Examination of each building's Final Safety Analysis Report to ensure that the description of the plant and procedures and the accident analysis are consistent with the plant as affected by safety related modifications made during the outage period.
- John T. Conway,
   Chairman

Appendix—Transmittal Letter to the Secretary of Energy

Defense Nuclear Facilities Safety Board
May 4, 1990.

Honorable James D. Watkins,
Secretary of Energy,
Washington, DC 20585.

Dear Mr. Secretary: On May 3, 1990, the Defense Nuclear Facilities Safety Board, in accordance with Section 312(k) of Public Law 100-456, approved a recommendation which is enclosed for your consideration.

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The Board will publish this recommendation in the Federal Register.

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- Independent assessment of the adequacy and correctness of systems operating procedures. Consistent with the contractor's operating philosophy, these procedures should be subject to the "procedural compliance" concept.
- Assessment of the level of knowledge achieved during operator resumption as evidenced by review of examination questions and examination results, and by selective oral examination of operators by members of the review group.
- Examination of records of tests and calibration of safety systems and other instruments monitoring Limiting Conditions of Operation or that satisfy Operating Safety Requirements.
- Verification that all plant changes including modifications of vital safety systems and plutonium processing workstations have been reviewed for potential impact on procedures, training and resumption, and that training and resumption have been done using the revised procedures.
- Examination of each building's Final Safety Analysis Report to ensure that the description of the plant and procedures and the accident analysis are consistent with the plant as affected by safety related modifications made during the outage period.

John T. Conway,
Chairman

FOR FURTHER INFORMATION CONTACT: George P. Sotos (202) 732-2174.

SUPPLEMENTARY INFORMATION: Section 3517 of the Paperwork Reduction Act of 1980 (44 U.S.C. chapter 35) requires that the Office of Management and Budget (OMB) provide interested Federal agencies and the public an early opportunity to comment on information collection requests. OMB may amend or waive the requirement for public consultation to the extent that public participation in the approval process would defeat the purpose of the information collection, violate State or Federal law, or substantially interfere with any agency's ability to perform its statutory obligations.

The Acting Director, Office of Information Resources Management, published this notice containing proposed information collection requests, prior to submission of these requests to OMB. Each proposed information collection, grouped by office, contains the following:

1. Type of review requested, e.g., new, revision, extension, existing or reinstatement; (2) Title; (3) Frequency of collection; (4) The affected public; (5) Reporting burden; and/or (6) Recordkeeping burden; and (7) Abstract. OMB invites public comment at the address specified above. Copies of the requests are available from George Sotos at the address specified above.