

**Department of Energy**

Washington, DC 20585

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DNF SAFETY BOARD

The Honorable John T. Conway
Chairman
Defense Nuclear Facilities Safety Board
625 Indiana Avenue, NW, Suite 700
Washington, D.C. 20004

Dear Mr. Chairman:

The purpose of this letter is to identify the Office of Environmental Management's (EM) progress towards our October 31, 2003 goal of institutionalizing the periodic safety system assessments established in the Defense Nuclear Safety Board Recommendation 2000-2 Implementation Plan. This letter is a follow-up to the letter transmitted to you on December 2, 2002, from Mr. Edward B. Blackwood, wherein DOE's path forward was described.

DOE Headquarters will ensure that Vital Safety System (VSS) assessments are institutionalized by the contractor into a DOE approved assessment schedule. This is action 1.2.1 under the EM QAIP. Under Order 420.1A, contractor system engineers using approved procedures and the Criteria and Review Approach Documents (CRADs) perform VSS assessments. At EM field sites, DOE safety system oversight personnel will review the contractor assessments in accordance with DOE policy. Implementation is on track to be completed by October 31, 2003, as committed.

I have enclosed a listing of those mechanisms each site is currently using to perform ongoing assessments of safety systems. Should you have any questions regarding this direction, please contact Mr. Lawrence Bailey at 202-586-2975.

Sincerely,

A handwritten signature in black ink, appearing to read "Jessie Hill Roberson".

Jessie Hill Roberson
Assistant Secretary for
Environmental Management

Enclosure

cc: Ed Blackwood, EH-24
Mark Whitaker, DP



EM Site Institutionalization of Safety System Assessments

Carlsbad Field Office:

- Management assessments performed by the CBFO and the M&O contractor are focused on operational readiness and safety systems, and they are executed through the mechanisms (including the CRAD) established in the waste handling building HVAC Phase II assessment. (CBFO Operational Plan; WP 13-1 Quality Assurance Program Description; WP 10-2 Maintenance Operations Instruction Manual; WP 09 Engineering Conduct of Operations; WP 04-CO Conduct of Operations)
- M&O contractor system engineers conduct annual system assessments and walk downs. (WP 09 Engineering Conduct of Operations; WP 10-2 Maintenance Operations Instruction Manual; WP 04-AD3005 Administrative Control of System Lineups)
- M&O contractor utilizes a computerized history and maintenance planning system to ensure due dates for assessments are met. (WP 10-2 Maintenance Operations Instruction Manual; WP 09 Engineering Conduct of Operations)

Idaho Operations Office:

- For operational awareness of safety systems, facility representatives, subject matter experts and program managers conduct readiness assessments, operational readiness reviews, and verification reviews. (DOE-ID TS AM 410.1-1 Section 1 Chapter 4 ESH&QA Oversight)
- The quarterly oversight and assessment plan includes required assessments and other focused assessments. (DOE-ID TS AM 410.1-1 Section 1 Chapter 4 ESH&QA Oversight)
- The Phase II objectives and criteria have been incorporated into the on-going INEEL contractor facility evaluation board (FEB) and self-assessment program and contractor oversight is provided by ID. (BBWI CTR 69)
- The FEB assessment schedule is updated and issued annually. (BBWI CTR 69)

Oak Ridge Operations Office:

- Training of inspection personnel for oversight of safety systems will be coordinated with the finalization of 10 CFR 830 compliant documented safety analyses (DSA).
- Programmatic actions associated with safety system assessments are incorporated in the routine facility representative program as well as comprehensive oversight activities. (EM-7.4, EM ES&H Oversight Program and EM-4.4, Facility Representative Program. Revisions including the Phase II criteria and CRADs will be completed by 9/30/03)
- Contractor's implementation plan to meet the requirements of DOE Order 420.1A, Facility Safety, Section 4.5, System Engineer Program will be implemented in 6/03.

Ohio Field Office:

- The Miamisburg Environmental Management Project (MEMP) has incorporated the Phase II model assessment criteria and guidelines into the FY 02-04 assessment schedule. The appropriate CRADS will be incorporated into the specific assessment plan, which is developed 30 days prior to the assessment.
- In FY 03 at MEMP, the criteria and guidance have been incorporated into the fire protection program assessment and the radiological protection program assessment.

- The Fernald Closure Project (FCP) has two types of safety systems: a) Silos 1, 2 and 3 structures and b) the Defense in Depth, which consists of the Silos Radon Monitoring System, Silos Berm and the Bentonite Layer.
- At FCP, contractor safety system requirements are specified in the System Safety Requirements Manual, RM-2116, Revision 9, dated 10/01/02.
- At FCP, DOE requirements are specified in the FCP Technical Management Plan, dated 2/03.

Richland Operations Office:

- In addition to the normal requirements for safety class and safety significant systems, system engineers (SE) are contractually required to perform a 2000-2 phase II assessment of all their identified safety systems. The criterion and review approach documents (CRAD) developed for Phase II Assessments are used to perform the assessments. (DE-AC06-96RL13200-Supplemented Contractor Requirements Document DOE-0-420.1A rev 0, Facility Safety, Letter #03-PRO-0112 Dated 11/21/02)
- Assessments will be performed on a bi-annual basis, i.e. all safety systems will be assessed at least once in a two year period. During this two-year period, the contractor FEB will review the assessments and walk down the systems with the SEs. Thus, half of the systems will be reviewed annually. (HNF-MD-10910, Institutionalization of DNFSB Recommendation 2000-2, Configuration Management, Vital Safety Systems)
- The FEB will also provide analysis of data to identify trending and potential emerging systemic issues. (HNF-PRO-8714 Facility Evaluation Board Assessments and HNF-PRO-052 Corrective Action Management)
- Richland's SME's periodically select a specific system and assess the FEB during their review and walk down of the system resulting in a written report back to the contractor. These RL assessments are planned and scheduled beforehand in RL's Integrated Evaluation Plan, which is updated quarterly according to the RIMS Document for Integrated Evaluation Planning, section 7 Monitoring Contractor Activities. (Richland Operations Office System Engineer Program Plan and RIMS Document "Training and Qualification of RL System Engineers for DNFSB Recommendation 2000-2 Vital Safety Systems")

Rocky Flats Field Office:

- Based upon its closure situation with almost all buildings being in the D&D mode, no additional Phase II assessments will be performed.
- Nevertheless, the contractor will continue to perform self-assessments and monitor projects and existing safety systems.

Office of River Protection:

- ORP has implemented a SME Program Plan identifying SME's and their duties. SME's review the contractor's operability evaluations and health reports for each of their assigned safety systems. (ORP Subject Matter Experts Program Plan, 03-TED-040 Attachment, dated 3/28/03)
- For each safety system, a SME performs one safety walk down per quarter.
- Beginning in Sep 2003, an annual evaluation will be performed jointly by all safety system SME's and facility representatives to determine which assessments will be conducted the next fiscal year.

Savannah River Site:

- Operational awareness is maintained through DOE-SR facility representatives, support staff and program managers. These three groups conduct readiness assessments, operational readiness reviews, and verification reviews. (Savannah River Office Implementing Procedure (SRIP) 420.1 Facility Representative Program, SRIP 223.4 SR Technical Assessment Program, SRIP 425.1 Nuclear Facility Startup Approval Process; NOTE: SRIP's apply to SR and not the M&O contractor)
- The annual technical assessment plan includes required assessments and assessments targeted as special interest. (SRIP 420.1 Facility Representative Program, SRIP 223.4 Technical Assessment Program)
- The SRS facility evaluation board (FEB) and self-assessment program embodies the Phase II objectives and criteria. (WSRC Manual SCD-4, Assessment Performance Objectives and Criteria, WSRC Assessment Manual 12Q, Section 4 Introduction-Facility Evaluation Board and Procedures FEB-1 Facility Evaluation Board, FEB-2 Facility Evaluation Board Annual Planning and Reporting also WSRC Manual Q11, Operations Evaluation Department Manual Administrative Procedure 3.0, Facility Evaluation Board Procedure and Procedure 3.2, Personnel Selection, Development, Proficiency, and Qualification.
- The FEB assessment schedule is revised and published annually. (WSRC Assessment Manual 12Q Procedure FEB-22 Facility Evaluation Board Annual Planning and Reporting)
WSRC Manual E7 Conduct of Engineering, Procedure 1.10 was revised to include design authority engineer responsibilities that align with the Phase II criteria. The E7, 1.10 procedure references have been incorporated into the applicable SCD-4 assessment criteria. The crosswalk between the Phase II criteria and SCD-4 criteria has been documented in a table that is maintained by site engineering. This table is discussed, as appropriate, to engineering personnel within the SRS operating divisions.