## DEFENSE NUCLEAR FACILITIES SAFETY BOARD

September 25, 1998

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

**FROM:** D. G. Ogg, Hanford Site Representative

**SUBJ:** Activity Report for Week Ending September 25, 1998

Staff member R. Arcaro was on site assisting with Site Representative duties.

A. <u>Spent Nuclear Fuel Project (SNFP)</u>: DOE-RL and SNFP management continue to work to resolve DOE's comments on the Cold Vacuum Drying (CVD) Facility Safety Analysis Report (SAR). Significant among the issues are questions about compliance with DOE Order 6430.1A, *General Design Criteria*, and compliance of safety class piping systems with the requirements of the ASME, Section III. The current schedule called for DOE-RL approval of the SAR on September 15. The project hopes to gain DOE-RL approval by next week to avoid a delay in the procurement of long-lead materials.

B. <u>Plutonium Finishing Plant (PFP)</u>: DOE-RL expects to issue a letter to the contractor next week regarding the PFP SAR. Initial indications are that DOE-RL will concur with the contractor's position that the new SAR, approved by DOE last fall, not be implemented, but that the plant continue to operate using the previously approved SAR as amended. Additionally, DOE-RL plans to issue an internal memo that will direct a strengthening of commitment tracking to prevent similar failures.

The Board's staff has reviewed the DOE response to the Board's letter of July 13, regarding assessment of alternatives for and acceleration of plutonium stabilization. Due to the less than adequate response from DOE, the staff plans a follow-up review in early October to obtain more details.

- C. Recommendation 92-4, Systems Engineering: The Board's staff participated video teleconferences to discuss systems engineering at PFP and the SNFP. Very little formal systems engineering is taking place at PFP. Although many of the aspects of systems engineering are present in some activities at PFP, the lack of focus on a systematic process for identifying requirements, evaluating and selecting alternatives, and documenting decisions, has led to inconsistent application of these principles. Systems engineering of the SNFP is more mature. Formal development of requirements, process flow diagrams, and risk management activities are in place. Linking the technical baseline to the cost and schedule baseline has recently been achieved. Prior to this linkage, the impact of changes in work scope on cost and schedule could not be immediately understood.
- D. Operational Readiness Review (ORR) Process: Mr. Arcaro met with DOE-RL and Fluor Daniel Hanford (FDH) to discuss the DOE-RL response to the Board's letter of April 15 regarding the readiness review process. Both FDH and DOE-RL are writing new procedures governing the readiness review process. In addition to describing the required review and approval process, the FDH procedure appropriately focuses on attainment of readiness. FDH has begun assigning startup coaches to mentor facility management and prepare for operations. DOE is working to ensure adequate staffing for the review and to ensure that team members are adequately qualified. The site reps will continue review of the new procedures to ensure they meet the requirements of DOE Orders and the tenets of Board Recommendation 92-6.

cc: Board members