DEFENSE NUCLEAR FACILITIES SAFETY BOARD

August 15, 1997

TO:	G.W. Cunningham, Technical Director
FROM:	P.F. Gubanc & D.G. Ogg, Hanford Site Representatives
SUBJ:	Activity Report for Week Ending August 15, 1997

Mr. Gubanc was on travel to DNFSB Headquarters Monday through Thursday.

A. Hanford Chemical Vulnerability: In researching the history of DOE-EH's 1994 Chemical Safety Vulnerability Review (vis-a-vis the PRF explosion), we have learned the following:

- 1. Hanford did perform a self-assessment in March-April 1994 which was validated by DOE-HQ in May 1994. PFP was specifically included in this review.
- 2. One of the Hanford findings specifically cited hazards associated with the prolonged storage of hazardous chemicals at PFP. Unfortunately, hydroxylamine nitrate (HAN) was not identified as one of those chemicals.
- 3. DOE-HQ requested a comprehensive site response plan. DOE-RL never answered that request. (DOE-EH did not provide guidance on how to respond until July 1995.)

B. Canister Storage Building (CSB) Construction: After approval by Fluor Daniel Hanford (FDH) and Duke Engineering Services Hanford (DESH), Mowat restarted crane operations at the CSB construction site on August 11. Initial construction activities will focus on correcting undersized welds in structural steel. Once these repairs are completed, erection of additional structural steel and siding will resume. Approximately three months have been lost due to work stoppages since the May 7 worker injury.

C. Integrated Safety Management System (ISMS): We have reviewed Fluor Daniel Hanford's (FDH) draft ISMS Plan and have the following observations:

- 1. The FDH ISMS Plan is based on, and consistent with, the draft ISMS guides prepared by DOE-HQ. While some "holes" were found, the plan provides a solid foundation.
- 2. In our opinion, the ISMS Plan requires strengthening in the areas of accountability and personnel qualification (especially for those who analyze hazards and establish controls).
- 3. The ISMS Plan is not the ISMS itself but rather outlines the basic elements the ISMS must contain. Performance of a "gap analysis" between the existing manuals of practice and the ISMS Plan's expectations is the next step towards full implementation.
- 4. The ISMS Plan also takes credit for considering and meeting the intent of other major initiatives such as OSHA's Voluntary Protection Program and standard ISO 14000.

We discussed our observations with DOE-RL on August 15. FDH expects to resolve comments and finalize the ISMS Plan by the end of August. DOE-RL approval is expected in September. We will continue to follow developments in this area and discuss them with DNFSB-HQ.

cc: Board Members