

96-WSD-263

**Department of Energy**  
 Richland Operations Office  
 P.O. Box 550  
 Richland, Washington 99352

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DNF SAFETY BOARD

Mr. John T. Conway, Chairman  
 Defense Nuclear Facilities Safety Board  
 625 Indiana Avenue N.W., Suite 700  
 Washington, D.C. 20004

Dear Mr. Chairman:

LATE DELIVERY OF THE DEFENSE NUCLEAR FACILITIES SAFETY BOARD (DNFSB)  
 RECOMMENDATION 93-5, REVISION 1, IMPLEMENTATION PLAN MILESTONE 5.4.3.5d,  
 "LETTER REPORTING QUALIFICATION OF ROTARY MODE CORE SAMPLING SYSTEM FOR USE IN  
 FLAMMABLE GAS TANKS"

This letter reports a delay to the completion of Recommendation 93-5  
 Implementation Plan, Revision 1, Milestone 5.4.3.5d, "Letter Reporting  
 Qualification of Rotary Mode Core Sampling System for Use in Flammable Gas  
 Tanks." The due date for this milestone was September 30, 1996. The targeted  
 completion date is late October, due to deficiencies encountered during the  
 Independent Operational Readiness Review. Enclosed is the memorandum  
 specifying the deficiencies, from Dave Brown, to John Wagoner, "Readiness  
 Review Conclusion that Rotary Mode Core Sampling is not Ready for Startup,"  
 dated September 30, 1996.

I believe that we are doing the right thing in delaying this activity to  
 verify proper readiness. We had, and continue to have, an aggressive schedule  
 and we will continue to press for the rapid completion of this milestone.

If you have any questions, please contact me, or your staff may contact  
 Jackson Kinzer, Assistant Manager for Tank Waste Remediation System, on  
 (509) 376-7591.

Sincerely,

John D. Wagoner  
 Manager

WSD:PRH

Enclosure

cc w/encl:  
 R. Guimond, EM-2  
 R. Izatt, EM-2  
 J. Tseng, EM-4  
 M. Hunemuller, EM-38  
 K. Lang, EM-38  
 J. Poppiti, EM-38

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memorandum

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Richland Operations Office

DNF SAFETY BOARD

DATE: SEP 30 1995  
REPLY TO:  
ATTN OF: PAD:DHB/96-PAD-118

SUBJECT: READINESS REVIEW CONCLUSION THAT ROTARY MODE CORE SAMPLING IS NOT READY FOR STARTUP

TO: John D. Wagoner  
Manager

You recently directed me to perform an Operational Readiness Review (ORR) of Rotary Mode Core Sampling (RMCS) operations. I assembled a team of personnel who are technically qualified to perform the ORR and have been conducting review activities. While the team has not completed the ORR, I have concluded that neither the contractor nor DOE is ready to proceed with RMCS operations at this time.

I based my conclusion on the following items:

- Commercial grade items have been installed in safety class systems but have not been inspected or otherwise qualified for this application.

WHC identified this problem shortly before the RL ORR began. They are presently reevaluating safety class equipment, item by item, to demonstrate that it can be relied upon to serve its intended function.

- Maintenance procedures required by the safety assessment have not been issued.

WHC has a two-page list of maintenance procedures which are still being developed. These procedures respond to specific controls in the RMCS safety assessment (the authorization basis). The ORR team cannot complete its review without assuring that there are procedures in place which account for all of the controls in the safety assessment.

- Operating procedures have not been developed in accordance with the requirements of WHC administrative procedures.

WHC personnel who prepared the RCMS operating procedures disregarded certain stipulations of the WHC administrative procedure governing the development of operating procedures. These stipulations responded to guidance in DOE Order 5480.19, "Conduct of Operations Requirements for DOE Facilities."

- The WHC ORR was inadequate in several areas.

The WHC ORR lacked the depth to identify the problem with undedicated commercial grade items installed in safety class systems. It also made an inappropriate judgement that maintenance procedures could be developed after startup, even though these procedures implemented requirements of the authorization basis.

- Control of emerging issues is inadequate.

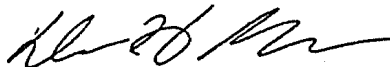
There is no system for identifying emerging issues and obtaining pre-startup/post-startup designation from an appropriate authority. Only the punch lists from the WHC and RL ORRs are being used to assure that all pre-startup items are completed. This overlooks problems and issues identified by other parties which require resolution prior to startup.

- DOE is not performing oversight of the engineering process.

RL personnel responsible for characterization activities are not knowledgeable of the WHC safety classification process and are not engaged on engineering issues. For example, they were unaware that the contractor was trying to resolve the thorny problem of undedicated commercial grade items installed in safety class systems.

Due to these problems, I have terminated the ORR. Several of these problems can be resolved fairly quickly, but two require special attention. These are the problem with DOE oversight and the inadequacy of the WHC ORR. I consider that these problems should be resolved and a new ORR accomplished before RCMS operations are allowed to proceed. I have discussed this decision with Paul Kruger, ESH, Tom Daniels, WOD, and Jim McClusky, TWRS.

Sincerely,



David H. Brown, RMCS ORR Team Leader  
Performance Assessment Division

cc:

J. J. Allen, WOD  
G. M. Bell, PAD  
F. T. Daniels, WOD  
J. E. Kinzer, TWRS  
P. W. Kruger, ESH  
J. K. McClusky, WSD  
S. J. Veitenheimer, QSH