

P.O. Box 450 Richland, Washington 99352

02-HAB-0012

AUG 3 0 2002

Mr. Todd Martin, Chair Hanford Advisory Board 1933 Jadwin Avenue, Suite 135 Richland, Washington 99352

Dear Mr. Martin:

CONSENSUS ADVICE #134: MAINTAINING AND IMPROVING HANFORD'S INTEGRATED SAFETY MANAGEMENT SYSTEM (ISMS)

Reference:

HAB Letter from T. Martin to R. J. Schepens, ORP, and K. Klein, RL,

"Maintaining and Improving Hanford's Integrated Safety Management System

(ISMS), dated July 11, 2002.

This letter responds to advice provided by the Hanford Advisory Board (HAB) to the U. S. Department of Energy (DOE) regarding the Hanford Occupational Health Process (HOHP) and its association with Employee Job Task Analysis (EJTA).

In the Reference, the HAB recommended "the integrated qualities of ISMS be preserved by writing future contracts for work conducted on contaminated sites to include participation in the HOHP with its individualized hazard assessment (EJTA) and sitewide medical surveillance program." The HAB also recommended continuing "to require the contractors to utilize the sitewide emergency services to optimize communication." The HAB requested notification when transition to site medical and surveillance services is accomplished.

Using the ISMS process, the Waste Treatment Plant (WTP) contractor thoughtfully considered participating in the HOHP during WTP construction and preoperational testing activity. This process analyzed the work, identified associated hazards and tailored the safety controls to these hazards. The outcome of this ISMS review identified no significant radiological hazards during construction and preoperational testing. Testing of the WTP site soil found the site not contaminated. Based on the ISMS results, the contractor determined participation in HOHP was not appropriate and DOE agreed.

Recognizing and analyzing change in programs, processes, and hazards is fundamental to ISMS. When the WTP begins its transition to production operations and new hazards are introduced, the ISMS process will reexamine these and reconsider the need to participate in the HOHP. When this analysis is completed, the DOE and the contractor will take appropriate action. The DOE will inform the HAB of the results of the ISM review and its decision on whether or not to participate in the HOHP.

With respect to requiring contractors to utilize the sitewide emergency services to optimize communication, the WTP contract requires Bechtel National, Inc. to meet the applicable portions of the Hanford Emergency Management Plan. As the WTP activities transitions from construction to operations, the ISMS process will also reevaluate the Hanford Emergency Plan requirements.

Should you have any questions, you may contact me, or your staff may call Robert C. Barr, Office of Safety Regulation, (509) 376-7851.

Sincerely,

Roy J. Schepens

Manager

COM:YS

cc: (see page 3)

T. Fitzsimmons, Ecology

M. A. Wilson, Ecology

M. S. Crosland, EM-11

P. Mabie, EnviroIssues

M. Gearheard, EPA

J. Iani, EPA

S. J. Olinger, RL

M. K. Marvin, RL

# cc: The Oregon and Washington Congressional Delegations

U.S. Senators (OR)

G. H. Smith

R. Wyden

U.S. Senators (WA)

M. Cantwell

P. Murray

### U.S. Representatives (OR)

E. Blumenauer

P. A. DeFazio

D. Hooley

G. Walden

## U.S. Representatives (WA)

N. D. Dicks

J. Dunn

R. Hastings

G. R. Nethercutt, Jr.

### State Senators (WA)

P. Hale

M. Hewitt

# State Representatives (WA)

J. Delvin

S. Hankins