

A.J. Eggenberger, Chairman
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DEFENSE NUCLEAR FACILITIES SAFETY BOARD

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October 30, 2008

The Honorable James A. Rispoli
Assistant Secretary for Environmental Management
U.S. Department of Energy
1000 Independence Avenue SW
Washington, DC 20585-0113

Dear Mr. Rispoli:

As part of a series of reviews on the reinvigoration of activity-level Integrated Safety Management at Department of Energy (DOE) sites, the staff of the Defense Nuclear Facilities Safety Board (Board) reviewed work planning and control processes and their implementation by Washington Closure Hanford, LLC (WCH). The Board's staff found that WCH has an acceptable process for the planning and control of activity-level work. In several cases, however, the staff identified the need for process enhancements and areas in which implementation could be improved.

For example, the method for analyzing hazards could be improved in several ways: (1) it could be made less dependent on a subjective evaluation of the complexity and the difficulty of the work to be planned, and the associated hazard categorization; (2) the hazard analyses for radiological and other hazards could be better integrated; and (3) controls for each hazard could be more explicitly identified in the hazard analysis and then directly carried forward into the final work instructions. The Board's staff also found that WCH has three processes used to plan and conduct work, and that they employ varying degrees of rigor. The first process is used to plan and control most mission-related work through the use of an integrated work control process (IWCP) and includes most highly hazardous operations. The other two processes, which are used to plan and control preventive maintenance and environmental restoration disposal facility operations, are not as rigorous or as well thought out as the IWCP process.

Personnel from the Richland Operations Office were aware of the desired improvements in the contractor's work planning and control processes. However, the effectiveness of the Richland Operations Office would be strengthened if DOE had a clear set of directives establishing the standards for work planning and control. Further, the criteria and review approach documents that are purported to be a part of the guide supporting DOE Order 226.1, *Implementation of Department of Energy Oversight Policy*, would further strengthen the effectiveness of the site office assessments.

The Honorable James A. Rispoli

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The enclosed report, prepared by the Board's staff, provides additional observations from the staff's review and is provided for your use in improving work planning and control at the River Corridor Closure Project.

Sincerely,

A handwritten signature in black ink, appearing to read "A. J. Eggenberger". The signature is fluid and cursive, with a large initial "A" and "E".

A. J. Eggenberger
Chairman

Enclosure

c: Mr. Glenn S. Podonsky
Mr. David A. Brockman
Mr. Mark B. Whitaker, Jr.