FIRST AND SECOND FY 96 QUARTERLY REPORTS ON DEFENSE NUCLEAR FACILITIES SAFETY BOARD RECOMMENDATION 92-4 IMPLEMENTATION PLAN FOR THE PERIOD OCTOBER 1, 1995 - MARCH 31, 1996

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1.0 INTRODUCTION

1.1 PURPOSE

This report provides status of activities underway from October 1, 1995 to March 31, 1996, at the Hanford Site and Department of Energy - Headquarters relative to topics contained in the <u>Defense Nuclear Facilities Safety Board (DNFSB) Recommendation 92-4 Implementation</u> <u>Plan, Revision 1</u>.

1.2 SITEWIDE SIX-MONTH HIGHLIGHTS FOR SYSTEMS ENGINEERING

During the six month period from October 1995 through March 1996, significant activity occurred within SiteWide Systems Engineering (SWSE). Just prior to this reporting period, responsibility for SWSE was transferred from the Office of Chief Financial Officer (CFO) to the Project Management Division (PMD) under the Assistant Manager for Facility Transition (AMF).

During the early Fall of 1995, significant effort involving RL managers and staff, regulators, and support contractors led to the development of proposed new direction for SWSE in FY 96. In December 1995, Mr. Lloyd Piper, AMF, obtained approval of the Site Management Board to establish this new SWSE direction at Hanford. This direction was promulgated in the RL Policy Document (RLPD) 430.1 "Hanford Site Systems Engineering Policy" and the RL Implementing Directive (RLID) 430.1 "Systems Engineering Criteria Document and Implementing Directive" on January 31, 1996.

On February 16, 1996, Mr. John Wagoner formally communicated RLPD 430.1 and RLID 430.1 to all RL managers. In February 1996 and early March 1996, these documents were formally transmitted through RL Procurement to Hanford contractors for implementation.

Specific details on the 92-4 Implementation Plan Site commitment status/progress for the fiscal year to date are provided in Section 2.1.

1.3 . TWRS SIX-MONTH HIGHLIGHTS FOR SYSTEMS ENGINEERING

Mr. Jackson Kinzer, Assistant Manager for the Tank Waste Remediation System (TWRS), transferred the TWRS System Engineering responsibilities to Ms. Carol Sohn, TWRS Management Systems Division Director. Ms. Sohn is aggressively pursuing completion of TWRS commitments made in the DNFSB Recommendation 92-4 Implementation Plan and in subsequent correspondence related to the plan.

A revised TWRS Systems Engineering Management Plan (SEMP) incorporating the DOE-RL Systems Engineering Policy was issued by the Contractor on February 5, 1996. The document will be forwarded to DOE-HQ for approval following DOE-RL review and resolution of comments.

Three commitments concerning the Multi-Function Waste Tank Facility and Aging Waste Transfer Line projects were submitted to the DNFSB for deletion on February 8, 1996.

Specific details on the 92-4 Implementation Plan TWRS commitment status/progress for the fiscal year to date are provided in Sections 2.2 and 2.3.

1.4 REPORT FORMAT

The report documents the progress of activities initiated in response to the DNFSB Recommendation 92-4. The report is arranged in the same order as the <u>DNFSB</u> <u>Recommendation 92-4 Implementation Plan, Attachment B (DOE 1994,)</u> i.e., Sitewide Commitments, Tank Waste Remediation System (TWRS) Program Commitments, and TWRS Project Commitments. Each commitment that was due or overdue during the October 1995 through March 1996 period and the next quarter (April through June 1996) is identified and followed by a description of its status. Topics for each reported commitment are:

- Completion status of commitments due during the quarter and date deliverable was submitted to the DNFSB
- Forecast completion for commitments due in the subsequent quarter
- Other information as required to explain commitment status

In addition to this information, a Table of Commitments lists all DNFSB commitments contained in the plan. Shaded commitments indicate those commitments that have been submitted to the DNFSB and are considered complete.

1.5 TABLE OF COMMITMENTS

TABLE OF COMMITMENTS

SITEWIDE COMMITMENTS

Commitment Number	Commitment/Deliverable Title	Plan Completion Date	Date Submitted to DNFSB	Status Note
2.2.a	 Draft Site Functions and Requirements (dated 01/10/94) and Addendums 1, 2, and 3 Draft Architecture Synthesis Basis for the Hanford Cleanup System Draft Systems Engineering Product Description Report for the Hanford Cleanup Mission 	6/30/94	7/12/94	
2.2.b(1)	 (1) Systems Engineering Implementation Plan based on FY 1995 Multi-Year Program Plan (MYPP) logic and planning for the site 	11/15/94		1
2.2.b(2)	(2) Letter of direction to affected site participants to include use of systems engineering in accordance with DOE policy to develop the technical baselines that will be used as the basis for MYPP updates	3/31/95	7/14/95	
3.6.a	Hanford Site Management System Directives	7/12/94		3
3.7.d	Draft Site Systems Engineering Management Plan (SEMP)	3/31/94	7/12/94	
3.7.e	Final Site SEMP	6/30/94		1
3.7.f	Draft Site SEMP Implementing Procedures	2/14/95		1

TABLE OF COMMITMENTS

TWRS PROGRAM COMMITMENTS

Commitment Number	Commitment/Deliverable Title	Plan Completion Date	Date Submitted to DNFSB	Status Note
2.4.a	Initial TWRS Systems Analysis Report reflecting the systems engineering work done to 10/31/93	10/31/93	4/1/94	
2.4.b	TWRS Detailed Preliminary Functional Analysis Report	1/18/94	4/1/94	
2.4.c	TWRS Top-Level Systems Requirements Review Report	1/31/95	4/95	
2.4.d	TWRS Technical Requirements Review Report	3/31/95		8
3.2.a	TWRS Integrated Technology Plan	6/10/94	9/28/94	9
3.3.a	DOE-RL and Hanford Contractor Staff Qualification and Training Process (Consistent with 93-3, Commitment 4.3)	10/31/94	11/17/94	
3.3.b	Hanford Performance-Based Training and Qualification Process (REF: 93-3 Commitment 4.3)	10/31/94	11/17/94	
3.3,e	DOE-RL Qualification and Training Evaluation and Assessment Process	10/31/94	11/17/94	
3.3.d	Report of Independent Assessment of RL and WHC TWRS Qualification and Training Process	10/21/94	10/21/94	
3.4.a	DOE-HQ (EM-36) Preliminary Staff Analysis Report	3/31/94	3/31/94	
3,4,b	RL TWRS Preliminary Staff Analysis Report	8/26/94	8/26/94	
3.4.c	DOE-HQ (EM-36) Individual Development Plans	10/31/94	10/31/94	
3.4.d	RL TWRS IDPs (Training Requirements Matrix)	10/31/94	11/17/94	

TABLE OF COMMITMENTS

TWRS PROGRAM COMMITMENTS

Commitment Number	Commitment/Deliverable Title	Plan Completion Date	Date Submitted to DNFSB	Status Note
3.4.e	RL TWRS Orientation Report documenting status and initiation of orientation	10/31/94	11/17/94	
3.4.f	HQ (EM-36) Orientation Report documenting status and initiation of orientation	10/31/94	11/17/94	
3.4.g	Final Staff Analysis Document	90 days after Stds Delivery	RL: HQ:	3
3.4.h	Report documenting completion of required technical training identified in Individual Development Plan and Training Requirements Matrix	RL: 8/31/95 HQ: 10/31/95		4
3.5.a	WHC TWRS Staffing Analysis and WHC Position Qualification Standards	1/27/95		3
3.5.b	WHC TWRS Individual Qualification and Training Plans	2/28/95	4/25/95	
3.5.c	WHC TWRS Selection Process Report documenting status and completion	3/17/95	4/25/95	1
3.6.b	TWRS Management Systems Description document and Policy Annexes	11/30/94	12/13/94	
3.6.c	Schedule for development and issuance of the WHC TWRS Management Plan and associated documentation	12/30/94		3
3.7.a	TWRS Industry/Government Standards Review Report	12/14/93	4/1/94	
3.7.b	A letter report summarizing the SE Comparison Analysis	10/31/94	11/10/94	
3.7.c	DOE-FM Report on DOD Systems Engineering Standard Review	3/31/95	6/19/95	1
3.7.g	Draft TWRS Systems Engineering Management Plan	3/31/94	3/31/94	
3.7.h	TWRS Systems Engineering Management Plan Implementing Procedures	12/30/94		2
3.7.i	Revised TWRS Systems Engineering Management Plan	12/30/94		2

TABLE OF COMMITMENT

TWRS PROGRAM COMMITMENTS

Commitment Number	Commitment/Deliverable Title	Plan Completion Date	Date Submitted to DNFSB	Status
3.8.a	Draft Configuration Management Plan that describes technical configuration control within the TWRS program	1/31/94	4/1/94	
3.9.a	TWRS Mulu-Year Work Plan	9/30/94	10/94	
3.10. a	TWRS Quality Management Policy Annex	11/30/94	12/13/94	
3.10.b	TWRS Health and Safety Management Policy Annex	11/30/94	12/13/94	

TWRS PROJECT COMMITMENTS

2.4.e	Multi-Function Waste Tank Facility Baseline Comparison Report	9/30/95	Pending Deletion	5
2.4.f	Multi-Function Waste Tank Facility Independent Critical Design Review Report	Prior to construction	Pending Deletion	5
2.4.g	Aging Waste Transfer Line Baseline Comparison Report	11/30/95	Pending Deletion	5
2.4.h	Cross-site Transfer Line Baseline Comparison Report	11/30/95		6
2.4.i	Initial Retrieval Demonstration Baseline Comparison Report	11/30/95		8
2.4.j	Initial Pretreatment Baseline Comparison Report	11/30/95		7
2.4.k	Scheduled dates for each Project Independent Design Review	1/31/95		3
2.4.1	Summary Report for each Standdown Review	1/13/94	4/1/194	

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TABLE OF COMMITMENTS

92-4 CONTINUING COMMITMENTS

Commitment	Commitment/Deliverable Title	Plan Completion	Date Submitted to	Status
Number		Date	DNFSB	Note
4.a	Quarterly Status Reports	Quarterly		
5.a	Revised 92-4 Implementation Plan	As required		
5.b	Discussions in Quarterly Status Reports	As required		

NOTES:

- 1. 2.2.b(1) RL anticipates submittal of SEIP/RLID 430.1 to DNFSB in May 1996 (FY 1996 MYPP logic). 3.7.e RL anticipates submittal of Site Systems Engineering Management Plan (SEMP) to DNFSB in May 1996. 3.7.f RL anticipates submittal of documentation to DNFSB in May 1996 to satisfy this commitment. See Section 2.1 of this report for additional details.
- 2. The schedule for 3.7.h and 3.7.i is uncertain pending submittal of the documents proposed for completion of the commitments to DOE-HQ and resolution and incorporation of DOE-HQ and DNFSB staff comments into these documents.
- 3. These RL commitments had been considered complete, but were reopened in mid-April 1996 at the request of DOE-HQ and the DNFSB staff. By mid-June 1996, RL will determine with the DNFSB staff the actions required to complete these commitments. HQ deliverables are forwarded under separate cover. See Section 2.0 of this report for additional details.
- 4. Commitment 3.4.h (DOE-RL) was to be completed in accordance with the DNFSB Recommendation 93-3 Implementation Plan as described in the September 9, 1995, letter from John Wagoner to Chairman John T. Conway. This approach is now being reevaluated. HQ deliverables are forwarded under separate cover.
- 5. These commitments were deleted in a letter from Secretary O'Leary to Chairman John T. Conway dated February 8, 1996.
- 6. Submittal of a report comparing the Cross-Site Transfer Line preliminary design review document to the functional design criteria is expected in June 1996. See Section 2.3 for additional details.
- 7. All project work was suspended by July 1, 1995 since the Alternative Acquisition Strategy for privatization will provide TWRS tank waste pretreatment. A formal request to defer this commitment will be made following final approval of a Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) change request by Washington State Department of Ecology.
- 8. The schedule for 2.4.d and 2.4.i is uncertain pending DOE-HQ approval of the TWRS Systems Requirements Review Action Plan.
- 9. DOE-RL is reevaluating the TWRS Integrated Technology Plan with a view toward clarifying the integration and implementation of research and development.

2.0 STATUS: COMMITMENTS DUE/OVERDUE DURING FIRST AND SECOND QUARTERS FY 1996 AND FORECAST FOR THIRD QUARTER FY 1996

2.1 SITEWIDE COMMITMENTS

2.1.1 <u>COMMITMENT 2.2.b(1)</u>: SYSTEMS ENGINEERING IMPLEMENTATION PLAN (SEIP) BASED ON FY 1995 MULTI-YEAR PROGRAM PLAN (MYPP) LOGIC AND PLANNING FOR SITE.

(DUE: November 15, 1994)

STATUS: OVERDUE: During this reporting period, RL developed new organizational ownership, policy and implementation guidance for SWSE at Hanford. Under this framework, RLID 430.1 "Systems Engineering Criteria Document and Implementing Directive" was developed, reviewed, revised and was issued formally by Mr. John Wagoner, RL Manager, on February 16, 1996. RLID 430.1 constitutes our SEIP and is based on the FY 1996 MYPP logic and planning for the site. This RLID has been informally shared with the DNFSB staff during this reporting period. RL anticipates this document will be formally provided to DNFSB, along with the Final SEMP, under separate cover letter in May 1996.

2.1.2 COMMITMENT 3.6.a: COMPLETE SITE MANAGEMENT SYSTEM (SMS) DIRECTIVES

(DUE: July 12, 1994)

STATUS: OVERDUE: This commitment was initially completed with issue of a set of directives on July 12, 1994 (with updates through July 14, 1994). In a July 12, 1995 letter from Nadine Highland to Chairman John Conway, RL reported the results of a review of all site directives to reduce unnecessary requirements. This letter identified four SMS directives which were being retained and forwarded copies of these directives as an update to this commitment.

In mid-April 1996, DOE-HQ/DNFSB notified DOE-RL that additional effort was required to meet the intent of the commitment. By mid-June 1996, RL will determine with DNFSB staff the actions required to complete this commitment.

2.1.3 COMMITMENT 3.7.e: FINAL SITE SYSTEMS ENGINEERING MANAGEMENT PLAN.

(DUE: June 30, 1994)

STATUS: OVERDUE: The Contractor prepared a Draft Site Systems Engineering Management Plan (SEMP) in accordance with RL direction and in alignment with the recent changes in policy and implementation for SWSE at Hanford (i.e. RLPD 430.1 and RLID 430.1). RL received the draft SEMP on March 22, 1996, and issued it to RL Project and Programs for review/comment. Comments were due by April 15, 1996. The Final SEMP is now under preparation, and RL anticipates it will be formally submitted to the DNFSB in May 1996.

2.1.4 <u>COMMITMENT 3.7.f</u>: DRAFT SITE SEMP IMPLEMENTING PROCEDURES

(DUE: February 15, 1995)

<u>STATUS</u>: OVERDUE: Site SE implementing procedures are available on the Hanford Local Area Network (HLAN) as guidance to specific projects and programs. RL anticipates that these procedures will be formally submitted to the DNFSB in May 1996 to fulfill this commitment.

2.2 TWRS PROGRAM COMMITMENTS

2.2.1 <u>COMMITMENT 2.4.d</u>: TWRS TECHNICAL REQUIREMENTS REVIEW REPORT.

(DUE: March 31, 1995)

<u>STATUS:</u> OVERDUE: The TWRS systems requirements form the basis for TWRS technical requirements. The TWRS systems requirements, as defined in the Mission Analysis Report and Functions and Requirements Document, were rejected following a review by DOE-HQ in April 1995. A TWRS System Requirements Review (SRR) Action Plan is being developed and the Contractor will submit a third revision of the plan to RL in April 1996. The schedule for closing the findings and recommendations and the schedule for conducting the TWRS Technical Requirements Review will be established once this Plan is accepted by DOE-RL, all comments on the Plan are resolved, and DOE-HQ approval is obtained.

2.2.2 <u>COMMITMENT 3.4.g</u>: FINAL STAFF ANALYSIS DOCUMENT.

(DUE: 90 days after 93-3 Qualification Standards Delivery)

<u>RL STATUS</u>: OVERDUE: This commitment was recorded as complete in the DOE-RL letter from John Wagner to Chairman John Conway dated September 9, 1995. Discussions with DOE-HQ and DNFSB staff members in mid-April indicated this commitment was still considered open. By mid-June 1996, RL will determine with DNFSB staff the actions required to complete this commitment.

<u>HQ STATUS</u>: EM-38 has essentially completed the final staffing analysis reflecting the reorganization of DOE-HQ personnel in the Fall of 1995. Remaining activities are contingent upon receipt of position descriptions for EM-38 from Human Resources. EM-38 will submit the final DOE-HQ staffing analysis within 90 days of receipt of these position descriptions.

2.2.3 <u>COMMITMENT 3.4.h</u>: REPORT DOCUMENTING COMPLETION OF REQUIRED TECHNICAL TRAINING IDENTIFIED IN IDPs AND TRMs.

(DUE: August 31, 1995)

<u>RL STATUS:</u> OVERDUE: A letter from John Wagoner to Chairman John Conway dated September 9, 1995 stated that commitment 3.4.h was contingent upon completion of the DNFSB Recommendation 93-3 Implementation Plan Technical Qualification Program. In a subsequent teleconference with DOE-HQ, DNFSB staff, and DOE-RL personnel, RL re-emphasized this position. Additionally, RL made a verbal commitment to develop a letter identifying how 92-4 commitment 3.4.h aligned with the 93-3 commitments.

This letter was drafted in February 1996. However, DOE-HQ believes insufficient alignment exists between the two Implementation Plan commitments and RL is evaluating a path forward. By mid-June 1996, RL will determine with DNFSB staff the actions required to complete this commitment.

HO STATUS: Report to be submitted to Chairman John Conway under separate cover.

2.2.4 <u>COMMITMENT 3.5.a</u>: WHC TWRS STAFFING ANALYSIS AND POSITION QUALIFICATION STANDARDS

(DUE: January 27, 1995)

STATUS: OVERDUE: This commitment was recorded as complete with issue of the initial contractor TWRS Staffing Analysis and Position Justification Standards. Refer to DOE-RL letter from Jackson Kinzer to Chairman John Conway dated April 25, 1995. This letter established a follow-on commitment to issue a revised WHC TWRS Staffing Analysis. By mid-June 1996, RL will determine with DNFSB staff the actions required to complete this commitment.

2.2.5 <u>COMMITMENT 3.6.c</u>: ISSUE SCHEDULE FOR DEVELOPING/ISSUING WHC TWRS MANAGEMENT PLAN AND ASSOCIATED DOCUMENTATION

(DUE: December 30, 1994)

STATUS: OVERDUE: This commitment was recorded as complete with issue of the deliverable on March 30, 1995. Refer to letter from Jackson Kinzer to Chairman John Conway. In Mid-April 1996, DOE-HQ/DNFSB staff notified DOE-RL that additional effort was required to meet the intent of the commitment. By mid-June 1996, RL will determine with DNFSB staff the actions required to complete this commitment.

2.2.6 <u>COMMITMENT 3.7.h</u>: TWRS SEMP IMPLEMENTING PROCEDURES.

(DUE: December 30, 1994)

STATUS: OVERDUE: Draft TWRS Systems Engineering Implementing Procedures (IPs) were issued in 1994. In August of 1995, revised interim drafts were issued. In March 1996 the Hanford Site Systems Engineering organization issued a draft site-wide Systems Engineering Management Plan (SEMP) for comment. This Site SEMP, the revised TWRS SEMP (see status of commitment 3.7.i, below), and user comments from the draft TWRS IPs will be reviewed for their impacts on the draft TWRS IPs during April 1996. The TWRS SEMP IPs will be issued by May 31, 1996 to support review and comment by DOE-HQ and DNFSB staff, and to support the transition activities associated with the Project Hanford Management Contract. A formal schedule for submitting the procedures to the DNFSB will be set once comments are analyzed.

2.2.7 <u>COMMITMENT 3.7.i</u>: REVISED TWRS SEMP.

(DUE: December 30, 1994)

STATUS: OVERDUE: The contractor issued a TWRS SEMP in 1994. On February 5, 1996, the contractor issued a revised TWRS SEMP incorporating the DOE-RL Systems Engineering Policy from the DOE-RL TWRS Program Management System Description (PMSD) document. Following informal submittal to DOE-HQ and resolution of comments, a schedule for final delivery of the TWRS SEMP will be established to complete this commitment. Informal comments received to date on the revised SEMP from DNFSB staff have been positive.

2.3 TWRS PROJECT COMMITMENTS

2.3.1 COMMITMENT 2.4.e: MWTF BASELINE COMPARISON REPORT.

(DUE: September 30, 1995)

STATUS: OVERDUE: The Multi-Function Waste Tank Facility (MWTF) and Aging Waste Transfer Line projects were officially canceled on December 11, 1995 and July 21, 1995 respectively. As a result, formal notification deleting three commitments (2.4.e, 2.4.f, 2.4.g) in the Recommendation 92-4 Implementation Plan was transmitted by the Secretary of Energy to DNFSB Board Chairman John Conway on February 8, 1996.

2.3.2 <u>COMMITMENT 2.4.f</u>: MWTF INDEPENDENT CRITICAL DESIGN REVIEW REPORT.

(DUE: November 30, 1995)

STATUS: See commitment 2.4.e.

2.3.3 <u>COMMITMENT 2.4.g</u>: AGING WASTE TRANSFER LINE BASELINE COMPARISON REPORT.

(DUE: November 30, 1995)

STATUS: See commitment 2.4.e.

2.3.4 <u>COMMITMENT 2.4.h</u>: CROSS-SITE TRANSFER LINE BASELINE COMPARISON REPORT.

(DUE: November 30, 1995)

<u>STATUS</u>: OVERDUE: The TWRS Systems Requirements specify development of a TWRS Functions and Requirements (F&R) document to provide top level requirements for TWRS projects. The F&R was developed in preliminary form but required rework as a result of the TWRS Systems Requirements Review (SRR). Since the SRR Action Plan, which lays out the path for approval of the F&R, has yet to be finalized, selected TWRS projects are proceeding on the basis of updated F&R documents in order to support critical TWRS Program objectives. The latest versions of the F&R are, therefore, being used as the starting point for development of project Design Requirements Documents.

For the Cross-Site Transfer Line project, a baseline comparison between the Functional Design Criteria and a preliminary Design Requirements Document based on the August 1995 version of the F&R has been completed and has reaffirmed the need for this project. This Baseline Comparison Report (BCR) was transmitted to DOE-HQ on December 1, 1995 and comments were received April 1, 1996. DOE-RL is currently evaluating comments concerning the use of this transfer line and its development path forward. An updated BCR is scheduled to be transmitted to DOE-HQ during the week of April 29, 1996. Construction of the Cross-Site Transfer Line is proceeding.

2.3.5 <u>COMMITMENT 2.4.i</u>: INITIAL RETRIEVAL DEMONSTRATION BASELINE COMPARISON REPORT.

(DUE: November 30, 1995)

STATUS: OVERDUE: Refer to Commitment 2.4.h for a discussion of the status of the TWRS Systems Requirements and TWRS Functions and Requirements documents. On the Initial

Retrieval Demonstration Project, design work is proceeding on the basis of the January 1996 version of the F&R. Once the SRR Action Plan is accepted and the TWRS F&R is approved, a schedule for completing this commitment will be established.

2.3.6 COMMITMENT 2.4.j: INITIAL PRETREATMENT BASELINE COMPARISON REPORT

(DUE: November 30,1995)

STATUS: OVERDUE: All work on this project was suspended July 1,1995 per DOE-RL directive. Funding is not allocated to the project in FY 1996 and work will not be resumed in the near-term. An Alternative Acquisition Strategy using privatization is planned to provide the pretreatment of tank waste. On December 15, 1995 negotiation between Department of Energy and Washington State Department of Ecology on changes to the Tri-Party Agreement Milestones M-50-00 and M-60-00, consistent with the Alternative Acquisition Strategy, were completed. Tri-Party Agreement Change Request M-50-95-01 was jointly prepared with the Washington State Department of Ecology, and a ninety day public comment period was completed. Comments are currently being reviewed and addressed. Upon approval of the finalized change request, a request will be submitted to defer commitment 2.4.j.

2.3.7 <u>COMMITMENT 2.4.k</u>: SCHEDULED DATES FOR EACH PROJECT INDEPENDENT DESIGN REVIEW

(DUE: January 31, 1995)

STATUS: OVERDUE: This commitment was recorded as complete with issue of the FY 1995 schedule for project independent design reviews. Refer to DOE-RL letter from Jackson Kinzer to Chairman John Conway dated February 13, 1995. This letter established a follow-on commitment to issue a revised schedule covering FY 1996 and beyond. By mid-June 1996, RL will determine with DNFSB staff the actions required to complete this commitment with the DNFSB staff.