

DEFENSE NUCLEAR FACILITIES SAFETY BOARD

December 11, 1998

TO: G. W. Cunningham, Technical Director

FROM: D. G. Ogg, Hanford Site Representative

SUBJ: Activity Report for the Week Ending December 11, 1998

Staff member Steven Stokes was on site this week assisting with site representative duties.

A. Plutonium Finishing Plant (PFP): On December 11, the DOE Operational Readiness Review (ORR) team leader held a close-out meeting for the PFP Thermal Stabilization ORR. He presented 15 pre-start findings, 6 post-start findings and 2 observations. The team recommends that B&W Hanford Co. be directed to start thermal stabilization of Pu oxides pending closure of the pre-start findings. The team also recommends that stabilization of other material types not be permitted until four specific post-start findings are closed.

DOE-RL plans to rush to submit another revision to the 94-1 Implementation Plan (IP) by early next week to meet the request of EM-60. The Site Representative believes that this IP change will reflect only educated guesses about start and end dates for the stabilization of Pu bearing materials. The schedule will likely have a low confidence level, similar to Spent Nuclear Fuel Project schedule of late 1997 that had a 20% confidence level and was subsequently unsuccessful. The new IP change request may not meet the basic criteria specified by DNFSB Policy Statement, PS-1, *Criteria for Judging the Adequacy of DOE Responses and Implementation Plans for Board Recommendations*, specifically:

- section II.3. “. . . implementation plans will be based on engineering or technical assumptions.”
- section II.4. “DOE’s approach must be outlined in sufficient detail . . . ”
- section II.5. “. . . adequately justified a course of action proposed in the implementation plan.”

The Site Representative strongly urges the Board’s staff to carefully consider these criteria in assessing the acceptability of the IP change request.

B. Office of River Protection: In its FY 1999 authorization for DOE (P. L. No. 105-261 § 3139), Congress created a new organization at the Hanford Reservation named the Office of River Protection (Office). The Office is to report to the Assistant Secretary of Energy for Environmental Management (EM-1) and be responsible for managing all aspects of the Tank Waste Remediation System (TWRS) including those activities under the privatization contract. On December 8, Messrs. Ogg and Stokes met with a representative of DOE-RL TWRS to discuss the RL plans for implementing the new Office.

While RL expects the new Office to be operational this month, an Office Manager has not been identified. Initially, all 76 RL TWRS employees will be given lateral transfers into the new Office, and 29 new positions will be added. The authorization bill does not provide for funding of the Office, nor is their mention of the Office in the appropriations bill.

cc: Board members