



Department of Energy

Washington, DC 20585

March 14, 2002

The Honorable John T. Conway
Chairman
Defense Nuclear Facilities Safety Board
625 Indiana Avenue, NW, Suite 700
Washington, DC 20004-2901

Dear Mr. Chairman:

The purpose of this letter is to provide an updated status on overdue Environmental Management commitments to the Defense Nuclear Facilities Safety Board (DNFSB). We currently have ten overdue commitments, consisting of one letter commitment and nine commitments from DOE Implementation Plans in reply to DNFSB Recommendations. Please find attached information regarding the status of EM delinquent actions.

Our objective is to routinely meet commitments as a normal course of doing business and we will continue to work closely with the Board and staff to achieve technically sound disposition. I will be happy to discuss any of these activities at our next meeting.

If you have any questions in the interim, please contact me at (202) 586-7709.

Sincerely,

A handwritten signature in cursive script that reads "Jessie Hill Roberson".

Jessie Hill Roberson
Assistant Secretary for
Environmental Management

Enclosure

cc:
R. G. Card, US
M. Whitaker, S-3.1



<i>COMMITMENT</i>	<i>OBLIGATION/ DELIVERABLE</i>	<i>RESPONSIBLE MANAGER/ ORGANIZATION</i>	<i>ACTION/STATUS</i>	<i>SCHEDULED DISPOSITION</i>
<p>Letter 00-503, Commitment 8, Action 2 (in reply to Board incoming letter of 8/29/00)</p>	<p>Adjust tank content chemistry to within established specifications, described in DST AN-107, for four Double Shell Tanks (DSTs) at ORP, by October 2001.</p>	<p>D. Bryson, ORP</p>	<p>As a result of equipment failures and other schedule delays, the original commitment was extended to February 2002 by a letter from the Assistant Secretary of Environmental Management to the Board. Tank chemistry corrections were accomplished in February 2002, on schedule. Additional confirmatory sampling is planned within the next 30-60 days.</p>	<p>Upon successful confirmation that tank chemistry continues to meet specifications, the Office of River Protection will request closure of this commitment. This proposal is anticipated to occur by April 2002.</p>
<p>Recommendation 2000-02, Commitment 11, Action 1</p>	<p>Assemble teams to assess the condition of Confinement Ventilation Systems, and provide a letter reporting completion, by September 01. The letter report is to enclose a sample assessment report from a facility at each site.</p>	<p>J. Roberson, EM-1 (as LPSO for the EM component)</p>	<p>Based upon discussions between DOE representatives and the Board as well as information gained through the Phase I activities, a revision to the IP is being drafted to change the scope of this commitment to include all safety systems, not just confinement ventilation systems. The Board provided input to this approach in a December 2001 letter and this input is being factored into final IP changes.</p>	<p>The IP change letter to the Board is expected to be signed in March 2002; these plans will also be addressed in a briefing to the Board on Recommendation 2000-2 activities, scheduled for April 10, 2002.</p>

Recommendation 2000-02: Commitment 20, Action 4	Annually, LPSOs are to review the results of ES&H assessments performed during the previous year and provide the Secretary of Energy with a Summary Report, by February 2002 for the initial report.	J. Roberson, EM-1 (as LPSO for the EM component)	DOE Notice 420.1, issued in February 2002, established an April 2002 completion for this activity. The Notice also directed that field input be submitted to headquarters by 03/29/02. As of early March, the SRS had submitted their assessment report for 2001 and the balance of EM sites are expected to meet the established schedule.	While the summary report is not scheduled to be completed until April, EM progress and the status of this activity will be included in the briefing to the Board on Recommendation 2000-2 activities, scheduled for April 10, 2002.
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<p>Recommendation 2000-1: Commitment 110, Action 0</p>	<p>Complete brushing and repackaging of Pu metal inventory, by August 2001.</p>	<p>L. Romine, RL</p>	<p>On 10/25/01, the EM Office of Integration and Disposition (EM-20) sent a letter to the Board reporting that brushing and repackaging of Pu metals and associated corrosion products was completed on 9/27/01. It was determined, however, that some welds on the outer containers were unsatisfactory because they contained porosity that exceeded ASME criteria. Accordingly, SRS acceptance criteria were not met as a result of the welding problem. Hanford performed an analysis of weld strength. A draft technical report was prepared in February 2002 and concluded that weld strength was good although porosity exceeds ASME code. SRS is currently evaluating the report. In March 2002, a recommendation is anticipated which addresses disposition for the 375+ containers already welded. Also in February 2002, personnel at the Plutonium Finishing Plant (PFP) completed welding 25 test containers with no or acceptable porosity. The final completion date is indeterminate at this point but a schedule may be proposed in March, assuming 25 test containers pass the weld</p>	<p>A definitive schedule for repackaging will be determined after successful testing of recent welds and results of the SRS technical report review - scheduled for March 2002.</p>
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Recommendation 2000-1: Commitment 114, Action 0	Package aluminum alloys for disposal at WIPP; brush and package remaining alloys at PFP, by June 2001.	L. Romine, RL	Concerns with moisture measurement data obtained from the Super Critical Fluid Extraction (SFE) equipment have caused delays. On 7/20/01, the EM Office of Integration and Disposition (EM-20) sent a letter to the Board reporting the delay. The department has rescinded use of the SFE technique until further notice. The 31 alloy items for WIPP have already been packaged. LANL recently issued a report identifying problems with the SFE equipment at PFP and no further testing or use of SFE is planned at this time. DOE has also decided not to send additional residue-like materials to WIPP. EM continues to analyze potential moisture measurement options and DOE Standard 3013. We shall continue to work with Board staff in pursuit of a clear path forward.	A decision on the preferred measurement method is expected in March 2002; a revised activity schedule will be based from these decisions.
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Recommendation 2000-01; Commitment 213, Action 0	Complete Am/Cm Vitrification Project design, by November 2001.	Roy Schepens, SRS	DOE is evaluating an alternative to the transfer of Am/Cm solutions to a HLW Tank. The vitrification project has been suspended and a new path for disposition of Am/Cm solutions is being formulated. At present, evaluation is focused to the feasibility of vitrifying the material through the DWPF with sludge batch 3 in the 2004-2007 time frame. Information regarding the vitrification project was previously provided to the Board in a 7/20/01 letter, a 9/5/01 briefing and a "120 day" reply to the Board on 9/5/01.	IP revisions are in development and DOE Secretarial approval of the revised IP is anticipated in April 2002.
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Recommendation 96-01; Commitment 2, Action 2	Finalize and report the primary and defense-in-depth administrative controls, operating limits and engineered systems for ITP, with a final report due December 1997.	J. McCullough, J. Reynolds, C. Robinson, SRS	A summary chemistry report was issued 7/15/98, which identified open issues involving controls, limits and systems. Resolution of these issues was held in abeyance pending the completion of an alternatives analysis. The Department is no longer pursuing the ITP start-up and a Record of Decision (ROD) on Salt Processing Alternatives was issued on 10/9/01 and sent to the Board on 11/1/01. Pursuant to the ROD, an RFP for proposals for facility design was issued on 12/5/01. The new approach is reflected in DOE's IP for Recommendation 2001-01, which was accepted by the Board 10/1/01.	The Department plans to recommend closure of Recommendation 96-01.
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<p>Recommendation 96-1, Commitment 5, Action 6</p>	<p>Define and document the plant sampling program for SRS tanks to confirm laboratory findings. Provide a sampling plan for Tank 48 benzene measurements, by June 1997.</p>	<p>J. McCullough, J. Reynolds, C. Robinson, SRS</p>	<p>Issues associated with two of the three tanks of concern, (Tanks 49 & 50) have had satisfactory disposition. Only Tank 48 continued as a concern and the Board has been kept current on the status of activities. Definitive actions were directly related to the results of alternative analysis and subsequent ROD, as discussed for the previous two EM 96-01 delinquencies. The new approach is reflected in DOE's IP for Recommendation 2001-01, which was accepted by the Board 10/1/01.</p>	<p>The Department plans to recommend closure of Recommendation 96-01.</p>
<p>Recommendation 96-1, Commitment 6, Action 0</p>	<p>Provide periodic progress meetings to the Board on ITP.</p>	<p>J. McCullough, J. Reynolds, C. Robinson, SRS</p>	<p>A briefing for the Board was held on 11/30/00 regarding the status of the Alternative Salt Processing Technology selection. The new approach is reflected in DOE's IP for Recommendation 2001-01, which was accepted by the Board 10/1/01.</p>	<p>The Department plans to recommend closure of Recommendation 96-01 in 2002.</p>

Recommendation 96-01; Commitment 1, Action 0	Report describing the results of calculations for bounding benzene generation, retention and release values for In-Tack Precipitation (ITP), by December 1997.	C. Robinson, SRS	A summary report describing a chemistry testing program was issued on 7/15/98; the Board was formally provided a copy on 7/17/98. Several benzene issues, however, remained open and were pending as an alternative analysis was planned. The Department is no longer pursuing the ITP start-up and a Record of Decision (ROD) on Salt Processing Alternatives was issued by DOE on 10/9/01. This report was sent to the Board on 11/1/01. Pursuant to the ROD, a request for proposal (RFP) for facility design was issued on 12/5/01. The new approach is reflected in DOE's IP for Recommendation 2001-01, which was accepted by the Board 10/1/01.	The Department plans to recommend closure of Recommendation 96-01.
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