



Department of Energy

Washington, DC 20585

April 21, 2003

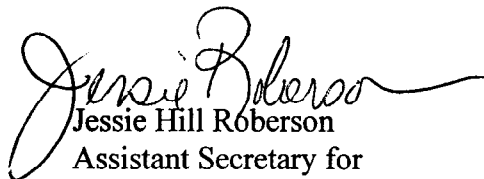
The Honorable John T. Conway
Chairman
Defense Nuclear Facilities Safety Board
625 Indiana Avenue, NW, Suite 700
Washington, D.C. 20004-2901

Dear Mr. Chairman:

I am writing in response to your letter dated March 7, 2003 concerning readiness preparations and the readiness review process at Hanford. We have reviewed the observations noted in your letter and its attached Staff Issue Report concerning our efforts to improve readiness review implementation. With regard to your specific observation on the need for formal training, we have completed the Department's readiness review training at Headquarters, Hanford, and Idaho over the past six months. A total of 89 people successfully completed the Team Member course and 37 people completed the Line Manager course. The Richland Operations Office actions that address your observations have been discussed with your staff and are summarized in the enclosed paper.

If you have any further questions, please call me at (202) 586-7709.

Sincerely,


Jessie Hill Roberson
Assistant Secretary for
Environmental Management

Enclosure

cc: Mark Whitaker, S-3.1
Paul M. Golan, EM-3
Keith A. Klein, RL



SWS Planning Lessons Learned

Issue	Resolution
1) DOE RL Line Management and the DOE ORR team did not receive formal training on preparing for and performing ORRs	The 9 members of the SWS DOE ORR team all received formal ORR training (ETT 401) provided on March 4 and 5, 2003. The SNF Project Manager/Line Management Team Lead received formal Line Management Training for ORRs (ETT 402) provided on March 6, 2003. Overall, 28 members of the Federal Staff (12 ORP and 16 RL) and 11 contractors who support the startup process completed the ORR training and 11 members of the Federal Staff (4 ORP and 7 RL) and 10 contractors completed the ORR training for facility managers.
2) Use of Senior advisor/mentor	Mr. Doug Shoop was assigned to the SWS DOE ORR team as a senior advisor to further enhance DOE ORR team performance
3) Use of common ORR implementation plans	In an effort to drive continuous improvement, the SWS ORR team has developed an SWS IP that is derived from the contractor IP, with specific enhancements that targeted potential SWS project weaknesses and risks. Furthermore, the SWS POA and IP considered the results of the FTS ORR and tailored the review accordingly.
4) Assignment of SWS ORR team members	Due to the close schedule proximity between FTS and SWS ORRs, the majority of the FTS DOE ORR team has been retained to perform the SWS ORR. This continuity is expected to enhance the overall DOE SWS ORR performance. Furthermore, team member qualification verification has been added to the member BIOs to better formalize the training/required reading completed by each team member
5) Implementation of DOE O 425.1B	The FTS POA/IP was written to 425.1A, as was current in the FH contract at that time. The SWS POA/IP has been developed in accordance with DOE O 425.1B
6) Continued refinements of DOE ORR pre-planning	In an attempt to further enhance performance of the DOE ORR team, planning for team observations, interview schedules, and other logistics are in progress. This activity is intended to minimize the potential for

Issue	Resolution
	distractions and crisis that detract from focus of the team on project readiness to safely operate.
7) Tech Editing Support Critical	Obtained tech-editing support early in the pre-ORR phase.
8) Improvements to RL Procedures	Several RIMS documents have been revised to incorporate comments from DNFSB staff and recent ORR training.
FTS Final Report Lessons Learned – RL internal process.	
1. The Team Leader and Program Element provided a facility tour for the startup Authorization Authority (AA) prior to the start of the ORR. This was beneficial in familiarizing the AA with the activity that he would be authorizing to start.	The AA took a tour with the FR and Mission Element the week of March 3.
2. Team Leader should not develop individual CRADs for team members	Individual team members are responsible for drafting CRADs for the IP. The team leader and senior technical advisor will approve the IP.
3. A process or chain-of-command needs to be established to inform the Team Leader of ORR delays. At this time, it is not clear who should be informing the Team Leader of when the ORR should start. Currently, the ORR Team Leader and Team are expected to be ready to start the ORR the moment the approval letter is signed. This ability to respond at a moment's notice would be impacted if team members were coming from offsite.	The Team Leader and Mission Element are working together to keep team members informed.
4. Several ORR Team members took a facility tour with the assigned Facility Representative prior to the ORR. They found this beneficial in learning about key issues associated with starting the facility.	The ORR team members attended system training on March 6 with the SNF FRs and SNF Line Management review team followed by a tour of the SWS system with facility personnel.
5. Technical editing support is <u>critical</u> to the overall success of the review activity.	Technical editing has been established
6. The team should refrain from providing the facility with comments prior to receiving a final product from the contractor. Failure to do this allows the contractor to	The team does not currently have a formal relationship with the facility.

Issue	Resolution
incorporate ORR team comments into their draft products to satisfy ORR Team expectations.	
7. Team members should have the opportunity to meet with contractor counterparts prior to the ORR to get a better understanding of the facility, systems, and organization that they will be reviewing. This would allow the team members to better tailor their review and interview activities. These meetings would need to be controlled to preclude the impression that the ORR had started prior to the entrance meeting.	The team members are the same as those used for FTS, so understanding of facility systems and organization is complete. A formal meeting between team members and the POCs shall be scheduled for the first day of the ORR.
Lessons Learned - DOE/Contractor Process	
1. Advance meetings between the contractor and the team leaders for contractor ORRs and DOE ORRs were beneficial in resolving ORR scope questions.	The DOE ORR team lead has met with the contractor to discuss POA scope and IP development.
2. Team preparations (facility orientation training, system overview training, facility tours, etc.) in advance of the ORR entrance meeting were beneficial in getting the ORR off to a quick start.	Formal ORR training, facility systems training, and a facility tour have been completed to support SWS DOE ORR.
3. Advance schedule coordination (facility activities/interviews/meeting schedules) between the ORR Team and facility is important to minimize team and facility confusion.	Advance schedule coordination is in progress.
4. The detailed presentation on contractor ORR finding dispositions following the in-brief meeting was very helpful to the ORR Team.	This is a key element of the planned in-brief.
5. Maintaining an Issue Tracking List was beneficial to the ORR Team and the contractor. This simplified the daily contractor debrief meetings, issue communications, and ORR team discussions.	This activity is still planned for SWS ORR.
6. Facility operations (staffing, shift rotation, etc.) during the ORR need to reflect or demonstrate the mode of operations that will be conducted following startup.	Planning incorporates this methodology.

CONTRACTOR IMPROVEMENTS

Issue	Resolution
Premature Declaration	<p>FHI developed HNF-GD-11615, <i>Startup Readiness Guidance</i>, with a Manager's check list sequenced in ISMS core functions, affidavits defining the scope of work relative to startup, and Readiness Self-Assessments necessary to prepare an activity for startup. HNF-PRO-055, <i>Startup Readiness</i>, was revised to drive the start of the readiness preparations earlier in the project. There are currently 82 RSAs covering all core requirements of DOE O 425.1B. Completion of RSAs by the responsible managers represents the completion of the Management Self-Assessment. Some improvement in the effectiveness of the RSA process has been demonstrated through the identification of readiness issues resulting in the management team delaying the declaration of readiness until those issues are corrected. Through use of the enhanced process, future Readiness activities are expected to improve, and effectiveness will be reevaluated.</p>
Effectiveness of Readiness Mentor	<p>The Mentors report to senior management (i.e., Project Vice President or Project Deputy). The Mentors coach the management team and provide senior management with a continuous independent assessment of the readiness state in the field. For at least six months a Startup Mentor has been assigned to SWS at K Basin, T Plant and TRU Retrieval.</p>
Adequately manage the turnover of operating systems	<p>Corrective actions include a RSA specifically addressing project turnover completion and work packages are evaluated to ensure remaining actions, individually or in aggregate do not preclude safe operations.</p>
Field verification and validation of surveillance and maintenance procedures	<p>Procedures, including preventive maintenance and Technical Safety Requirement (TSR) surveillance procedures, are now being field validated and performed under mock conditions prior to declaration of readiness for our projects. Mentors are in the field monitoring performance.</p>

CONTRACTOR IMPROVEMENTS

Issue	Resolution
Management performance of RSA	Mentors are assigned to the projects to coach management on the expectations of RSA. As a result of FH recognition for improvement, managers are personally involved in the performance of the RSA and the manager's assessments are reviewed and approved by the Facility Manager.
Management's understanding of the criteria for readiness	Training was provided at the Hanford Site by DOE Headquarters, "HQ ORR Training for Line Management" and was attended by FH Operations, Readiness Management and Mentor representatives. The assigned Mentors coach management on readiness.