

**[DNFSB LETTERHEAD]**

September 15, 1992

The Honorable Richard Claytor  
Assistant Secretary  
for Defense Programs  
Department of Energy  
Washington, D.C. 20585

Dear Mr. Claytor:

By letter dated August 31, 1992, DOE forwarded a report on the status of functional and preoperational testing for Building 707 at the Rocky Flats Plant. The Board and its staff have reviewed the report and note that it does not provide a clear status of testing, nor does it provide DOE's evaluation of whether the status supports resumption of operations (see enclosure and attached staff memorandum). Thus the submittal does not meet the commitment by DOE in its implementation plan for DNFSB Recommendation 90-4, where it states: "The status of functional and preoperational testing will be evaluated and reported to the Board as part of the detailed criteria to be submitted at least 4 weeks prior to the start of the DOE ORR."

The Board also notes that DOE has also submitted a draft of the criteria review and approach document and the EG&G readiness to proceed memorandum on September 11, 1992. However, the DOE has not yet provided its evaluation of readiness to proceed with the ORR, nor do these documents bear directly on the issue discussed above.

Based on discussions between your staff and the Board's staff, the DOE ORR is now scheduled to start September 21, 1992. The DOE submittals, to date, do not meet the commitment made in the DOE 90-4 Implementation Plan, namely to provide DOE's evaluation of system readiness and to do so least four weeks prior to the start of the ORR. Additionally, the detailed criteria upon which the ORR will be conducted, the Criteria and Review Approach Document (CRAD), is also to be submitted at least four weeks prior to the start of the ORR. To date, a DOE approved CRAD has not been submitted to the Board.

Please provide a revised submittal on functional and preoperational testing that addresses the comments above and in the enclosure. This revised submittal along with a DOE approved CRAD and readiness assessment should be provided as soon as possible to allow adequate time for Board review.

John T. Conway  
Chairman

2 Enclosures

Copy to:  
M. Fiori DOE  
V. Stello, DOE  
S. Blush, DOE

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## Enclosure

### **Comments on DOE Submittal of Status of Functional and Preoperational Testing in Building 707 at Rocky Flats dated August 31, 1992**

1. The contractor report describes the status of testing for several vital safety systems (VSSs) using the statement of operability partially verified. The report does not provide specific status information on the scope or date of testing which has been performed or the scope of testing that remains for the VSSs which have not been fully tested. Test procedure/work package numbers are referenced but there is insufficient information to determine the scope of the testing which is done or remains to be done.
2. There is no evaluation by DOE of the status of testing as stated in the DOE Implementation Plan. DOE has not provided any assessment on whether testing results support commencing an ORR in the near future; thus assuring that a premature ORR is avoided. The contractor report claims that "Lack of information from the post maintenance testing will not prevent the ORR team from performing a valid assessment of the VSS." The lack of detail noted above, however, does not allow for an independent assessment of that claim.
3. The DOE 90-4 Implementation Plan also states that "It is intended...that nonplutonium start-up tests (functional and preoperational) will be completed for vital safety system equipment before the EG&G readiness to proceed memorandum is sent to DOE." Based on the contractor report, RFP will not comply with the stated intention of the DOE 90-4 Implementation Plan concerning completion of VSS testing prior to submittal of the readiness to proceed memorandum DOE has not provided any comment on the justification for not meeting the stated intention of the DOE 90-4 Implementation Plan.