

John T. Conway, Chairman

A.J. Eggenberger, Vice Chairman

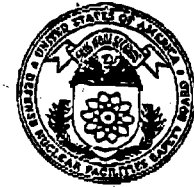
John W. Crawford, Jr.

Joseph J. DiNunno

Herbert John Cecil Kouts

DEFENSE NUCLEAR FACILITIES SAFETY BOARD

625 Indiana Avenue, NW, Suite 700, Washington, D.C. 20004
(202) 208-6400



October 22, 1997

The Honorable Alvin L. Alm
Assistant Secretary for Environmental Management
Department of Energy
1000 Independence Avenue, SW
Washington, D.C. 20585-0113

Dear Mr. Alm:

The Defense Nuclear Facilities Safety Board (Board) has reviewed your report submitted in response to the Board's letter of September 17, 1997, regarding preparations to resume fissile material handling at the Hanford Plutonium Finishing Plant (PFP). The Board finds that the report addresses only superficially the key attributes of readiness verification set forth in our letter. Given the amount of time and resources PFP has had to prepare for fissile material handling, the Board is concerned that more detail was not provided in the report. In particular:

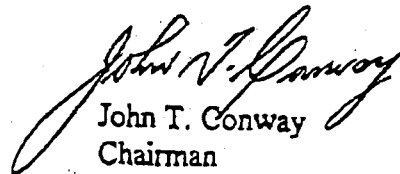
- The report simply provides a list of the risks considered during restart preparations. A technical discussion of these risks, particularly considering how they may worsen over time, is not included. Additionally, some of the risks described are programmatic in nature and have no direct safety significance.
- The Department of Energy Richland Operations Office (DOE-RL) has made personnel changes in an effort to ensure that it can effect lasting corrective actions at PFP. The report makes no mention of the unique qualifications, necessary supplemental training, and adjusted responsibilities of the newly appointed program manager required to ensure that the needed improvements are achieved. Similarly, the new role and responsibilities of the transferred Facility Representative in the Transition Programs Division are not detailed.
- DOE-RL acknowledges that because of an error in its letter of September 5, 1997, action to clarify the scope of the DOE-RL Readiness Assessment is required. Yet over a month later, DOE-RL has still failed to take this action. The Board considers this failure to be indicative of DOE-RL's lack of appreciation for the importance of *formal* communication with its contractors.
- The B&W Hanford Company (BWHC) plan for resuming fissile material handling has not yet been approved by DOE-RL. Additionally, your report describes only briefly the Fluor Daniel Hanford (FDH) plans for assessing readiness. The lack of detailed approved plans by BWHC and FDH makes it impossible for the Board to evaluate the adequacy of recovery actions.

The Honorable Alvin L. Alm

Page 2

The Board understands that DOE will be pursuing facility readiness preparations during the next few weeks. In light of the impending restart, an amended report would be neither timely nor particularly useful; however, the Board expects that DOE-RL will formally resolve these issues to its own satisfaction. The Board has, therefore, tasked its staff to closely monitor the resolution of these issues as DOE-RL and its contractors continue preparations for the resumption of fissile material handling at PFP.

Sincerely,



John T. Conway
Chairman

c: Mr. Mark B. Whitaker, Jr.
Mr. John Wagoner