

[SOE LETTERHEAD]

June 20, 1990

The Honorable John T. Conway
Chairman
Defense Nuclear Facilities Safety Board
Suite 675
600 E Street, N.W.
Washington, D.C. 20004

Dear Chairman Conway:

In response to your letter of May 4, 1990, I accept your recommendations to conduct an Operational Readiness Review at the Rocky Flats Plant prior to resumption of operations.

Purpose

The Purpose of the review is to verify the readiness of the Rocky Flats Plant to safely resume plutonium operations.

Scope

The scope of the review will include the following:

- (1) the Operational Readiness Review process implemented by the operating contractor (EG&G Rocky Flats, Inc.);
- (2) the resolution of recommendations and findings made by official review teams; and
- (3) the readiness of the plant, equipment, personnel, and administrative systems for the resumption of plutonium processing and component manufacturing operations.

Emphasis will be placed on evaluating the readiness of Buildings 539 and 707 to operate safely. The Operational Readiness Review will also include the adequacy of operations support services, including training, maintenance, waste management, environmental protection, industrial safety, radiological protection, emergency preparedness and engineering.

The names of those individuals conducting the review are listed in the enclosure. As the review develops, other names may be added. These individuals will be meeting at the Rocky Flats Plant during the week of June 18, 1990, to become acquainted with the facilities, personnel, and operating practices at the Rocky Flats Plant and to develop a detailed scope and plan for conducting the Operational Readiness Review. This scope and plan will include the five issues set forth in your letter of May 4, 1990, namely:

- Independent assessment of the adequacy and correctness of process and utility systems operating procedures. Consistent with the contractor' s operating philosophy, these procedures should be in sufficient detail to permit the use of the "procedural compliance" concept.
- Assessment of the level of knowledge achieved during operator requalification as evidenced by review of examination questions and examination results, and by selective oral examinations of operators by members of the review group.
- Examination of records of tests and calibration of safety systems and other instruments monitoring Limiting Conditions of Operation or that satisfy Operating Safety Requirements.
- Verification that all plant changes including modifications of vital safety systems and plutonium processing workstations have been reviewed for potential impact on procedures, training and requalification, and that training and requalification have been done using the revised procedures.
- Examination of each building's Final Safety Analysis Report to ensure that the description of the plant and procedures and the accident analysis are consistent with the plant as affected by safety related modifications made during the outages period.

Other issues that are appropriate in evaluating the readiness of the plant, personnel, and procedures will also be addressed by the readiness review team.

In accordance with 42 U.S.C. 2286(d), DOE's response to the Board' s recommendations will be put in the Federal Register, and an implementation plan will be provided within 90 days of the date of that notice.

Sincerely,

James D. Watkins
Admiral, U.S. Navy (Retired)

Enclosure