

**[DNFSB LETTERHEAD]**

May 4, 1990

Honorable James D. Watkins  
Secretary of Energy  
Washington, DC 20585

Dear Mr. Secretary:

On May 3, 1990, the Defense Nuclear Facilities Safety Board, in accordance with Section 312(5) of Public Law 100-456, approved a recommendation which is enclosed for your consideration.

Section 315(A) of Public Law 100-456 requires the Board, after receipt by you, to promptly make this recommendation available to the public in the Department of Energy's regional public reading rooms. Please arrange to have this recommendation placed on file in your regional public reading rooms as soon as possible.

The Board will publish this recommendation in the Federal Register.

You will note that the Board has recommended that a readiness review be carried out at Rocky Flats prior to resumption of operations. When the composition of the group to conduct this review has been established and a written plan and scope for carrying out the review has been developed, the Board wishes to be informed. We also request that the Board be provided with the results of the review before resumption of operations is authorized.

Sincerely,

***John T. Conway***  
***Chairman***

Enclosure

RECOMMENDATION TO THE SECRETARY OF ENERGY  
pursuant to Section 312(5) of the  
Atomic Energy Act of 1954, as amended.

Dated: May 3, 1990

In several visits to Rocky Flats, the Board and its experts have reviewed aspects of operations and activities. These reviews have been directed toward ensuring adequate protection of public health and safety and concern matters that have an important bearing on resumption of plutonium processing operations. The Board's reviews have included such operations-related activities as reconstruction of drawings of systems important to safety ("red-lining"), development and validation of plant operating procedures, and training and requalification of plant operators in plutonium processing operations.

Several of these contractor activities, which would ordinarily be conducted in sequential manner, are being carried forward concurrently. Because of the interdependence of these activities, the Board has not yet been able to predict their adequacy at the time of the proposed resumption of plutonium processing operations. For example, at the time of our most recent visit, no training lesson plans had been approved and less than one-third had been submitted for review. Training materials that were reviewed contained extensive on-the-job examination and performance requirements leading to requalification. This process will be time-consuming.

Usual practice in restarting a nuclear facility after an extended outage is the conduct of a comprehensive operational readiness review. Aware of the benefits of this practice in ensuring that public health and safety are adequately protected, and in view of the situation, the Board recommends that such a readiness review be carried out at Rocky Flats prior to resumption of operations.

We recommend that the group constituted to carry out the readiness review be composed of experienced individuals and that their backgrounds collectively include all important facets of the unique operations involved. We recommend the review include, but not be limited to, the following items:

- o 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.
- o 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.
- o Examination of records of tests and calibration of safety systems and other instruments monitoring Limiting Conditions of Operation or that satisfy Operating Safety Requirements.

- o 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 then training and requalification have been done using the revised procedures.
- o 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.

John T. Conway, Chairman