

[DOE LETTERHEAD]

August 2, 1991

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

Dear Hr. Conway:

Your letter dated May 29, 1991, accurately describes the features of the final Operational Readiness Review (EM ORR) currently underway for the Waste Isolation Pilot Plant (WIPP) per the Board's Recommendation 91-3 dated April 25, 1991. Much of the additional information you requested is provided in the Implementation Plan dated June 5, 1991, and the attachments to the Implementation Plan: Table 1, Selected Level-1 DOE Orders Applicable to WIPP; Attachment 1, Safety Objectives and Assignments; Attachment 2, Objectives and Sub-Objectives; and Attachment 3, Criteria and Review Approaches. These documents are included with this letter (Enclosure 1). Specific comments on the points in your letter are provided below.

DNFSB Review of Criteria and Review Approaches

As stated above, the Criteria and Review Approaches (CRAs) are included with this letter. The CRAs have been reviewed by the senior advisors and their comments have been incorporated. As the EM ORR progresses, changes in the CRAs may be needed as a result of review findings or direction from the senior advisors.

Scope of DOE-EM ORR and Relationship to the Integrated System Checkout (ISC)

The systems important to safe waste handling operations at WIPP include those having Limiting Conditions for Operation (LCOs) which were provided to the DNFSB on May 20, 1991, and are included with this letter (Enclosure 2). Phase I and II included waste handling operations to the extent that they could be reviewed prior to the ISC, but the majority of the waste handling operations will be reviewed during the ISC which is under way during Phase III of the EM ORR.

Qualifications of the ORR Team Members

The senior advisors reviewed the qualifications of the team members, met the team during the early part of June, and discussed the review approach with key team members. The senior advisors are satisfied that the team members have the right qualifications and experience to competently complete the EM ORR to the satisfaction of the senior advisors. One additional reviewer in Environmental Compliance has been added to the team.

Adequacy of Definition of Functional Responsibilities of Multiple Organizations Involved at WIPP

The documentation of functional responsibilities will be provided to the DNFSB under separate cover.

Relationship of ORR to Test Phase Plan

Subsequent ORRs and FSAR addenda will be prepared for future tests, such as the alcove tests, that are not covered by the current FSAR addendum and the current EM ORR.

Role of the Senior Advisory Committee

The senior advisors have reviewed and commented on the CRAs and have observed the Phase I and II reviews. The senior advisors have arranged to selectively oversee Phase III beginning the week of July 15 to observe drills and evolutions during the contractor's ISC and to be involved in the preparation of the final EM ORR report. Additionally, the senior advisors will be available for consultation throughout the EM ORR, including preparation of the final report.

An advance copy of the enclosures was provided to your staff during their visit at the site during the first week of June.

Sincerely,

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

Enclosures

Enclosure 1

IMPLEMENTATION PLAN
FOR AN
OPERATIONAL READINESS REVIEW
FOR THE
DRY BIN SCALE TEST PHASE OF OPERATIONS
91-3, Implementation Plan

WASTE ISOLATION PILOT PLANT (WIPP)
June 5, 1991

1.0 BASIC OBJECTIVE

The basic objective of this Implementation Plan is to provide the approach and guidelines for the DOE Office of Environmental Restoration and Waste Management (EM) to perform the final DOE Operational Readiness Review (EM ORR) of the WIPP Facility. The EM ORR will assure readiness with respect to safety, health, environmental compliance and management to operate during the Dry Bin Scale Test Phase using Transuranic (TRU) wastes.

2.0 BACKGROUND

The Implementation Plan for an Operational Readiness Review (ORR) for the Dry Bin Scale Test Phase of Operations has been prepared to document the plan to be used in the readiness review of the test phase, which will reflect DOE's responsibilities for safe and environmentally compliant operation of the WIPP facility and respond to the Defense Nuclear Facilities Safety Board (DNFSB) recommendation that DOE conduct a comprehensive, independent operational readiness review of the facility prior to authorization and initiation of the test phase. The Plan addresses all waste handling operational and support function aspects of the test phase as well as the WIPP unique transportation system and packaging requirements.

The ORR is to be directed by Environmental Restoration and Waste Management (EM), which is the responsible DOE Office. The EM ORR is staffed by a combination of DOE employees, DOE contractors, and outside experts. Although responsible EM management is represented in key positions on the EM ORR team, the majority of the team is independent of any connections to the WIPP Project.

Overall management and operations of the WIPP Facility are subcontracted to the Westinghouse Electric Corporation, Waste Isolation Division, who has established a functional organization at the WIPP site. Westinghouse is designated as the responsible contractor for all matters relating to health, safety and protection of the environment. A secondary contractor on-site is Sandia National Laboratories, who has responsibility for providing technical advice and for designing and operating the test program.

Enclosure 2

WIPP LIMITING CONDITIONS for OPERATIONS (LCOs)

BASE FACILITY

RADIATION INSTRUMENTATION

CONTINUOUS AIR MONITORS (CAMs)

EFFLUENT MONITORS

AREA RADIATION MONITORS (ARMs)

VENTILATION SYSTEMS

W.H. BLG. DIFFERENTIAL PRESSURES

U/6 RAD. MAT. AREA DIFFERENTIAL PRESSURES

U/6 EXHAUST AIR FILTRATION SYSTEM

H.H BLG EXHAUST FILTRATION SYSTEMS

BACKUP ELECTRICAL SYSTEM

DIESEL GENERATOR

FIRE DETECTION AND ALARM SYSTEMS

EXHAUST FILTER BLG.

W.H. BLG.

U.G. RAD. MAT. AREA

FIRE SUPPRESSION SYSTEMS

EXHAUST FILTER BLG.

W.H. BLG.

U/G RAD. MAT. AREA

BIN SCALE TEST PHASE (from DRAFT FSAR ADDENDUM)

TEST BIN OVERPRESSURIZATION PROTECTIVE SYSTEM

TEST BIN GAS MONITORING