

[DOE LETTERHEAD]

June 5, 1991

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

Dear Mr. Conway:

This responds to your April 26, 1991, letter in which you issued Recommendation 91-3 regarding the need for the Department of Energy (DOE) to conduct a comprehensive and independent readiness review of the Waste Isolation Pilot Plant (WIPP) prior to initiation of the test phase.

As you know from the briefing by Mr. Leo P. Duffy to the Board on May 1, 1991, the Department, through its Office of Environmental Restoration and Waste Management (EM), is aggressively pursuing a comprehensive and independent Operational Readiness Review (EM-ORR) at WIPP. The review team began work on-site on May 6, 1991.

The Department accepts the Board's comments and recommendations and is taking action to comply with the Board's direction as part of ongoing readiness review activities. The EM-ORR will be performed after completion of the contractor's readiness review, except for integrated readiness testing of bin handling. This testing by the contractor has not been completed because certain bin system auxiliary equipment is still arriving on-site. Once installed, this equipment will be tested and the contractor's readiness review can be completed. Since this activity is a limiting item for the beginning of the test phase, the EM-ORR will overlap portions of the contractor's review; however, the EM-ORR will not be completed until after the contractor's readiness review is finished.

As stated in the Final Safety Analysis Report (FSAR), the WIPP facility does not have any systems that meet the definition of Safety Systems as required by DOE Order 6430.1A. There are, however, certain systems that are important to safe waste handling operations, some of which have Operational Safety Requirements (OSRs) and Limiting Conditions for Operations (LCOs) associated with them. The EM-ORR team proposes to perform examination of records and verification of as-built drawings for these systems that are important to safe waste handling operations.

I appreciate the time you have devoted to this effort, which included a May 20, 1991, presentation on the status of the EM-ORR effort, and your comments on a preliminary draft of our Implementation Plan. Our next opportunity to brief the Board on the status of the EM-ORR should occur shortly after I issue Revision 8 to my draft Decision Plan for the WIPP, which I expect to do on or about June 10, 1991.

Sincerely,

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