

[DNFSB LETTERHEAD]

April 26, 1991

The Honorable James D. Watkins
Secretary of Energy
Washington, D.C. 20585

Dear Mr. Secretary:

On April 25, 1991, the Defense Nuclear Facilities Safety Board, in accordance with Section 312(5) of Public Law 100-456, approved Recommendation 91-3 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.

Sincerely,

John Conway
Chairman

Enclosure

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

Dated: April 25, 1991

The Board and its staff have received several status briefings and have conducted several site visits to the Waste Isolation Pilot Plant (WIPP). These reviews were directed at ensuring adequate protection of public health and safety during conduct of the test phase at the WIPP facility.

During a recent briefing on the WIPP Project, Department of Energy (DOE) personnel described twelve separate reviews, appraisals, and assessments by various DOE offices, contractor, and State oversight organizations that have been conducted at WIPP since October 1988. Since DOE's review of the readiness at WIPP was spread over approximately a three year period, the Board is concerned that DOE does not intend to perform a final comprehensive readiness review, after completion of the contractor's readiness review, prior to the initiation of the test phase. Therefore, the Board recommends:

1. that an independent and comprehensive DOE readiness review be carried out at WIPP prior to initiation of the test phase. As indicated in item 2, members of the review team may include some personnel from the line organization;
2. that the team constituted to carry out the readiness review consist of experienced individuals whose backgrounds collectively include all important facets of the unique operations involved and that the majority of the team members be independent of WIPP programmatic or line management responsibilities to ensure an independent and unbiased assessment;
3. that the DOE readiness review team confer with the DOE teams that are currently performing readiness reviews at other DOE facilities to determine what procedures for conducting readiness reviews have or have not been effective, recognizing that a tailored approach is required for WIPP; and
4. that the review include, but not be limited to, the following items:
 - a. assessment of the adequacy and correctness of waste handling and utility systems normal and abnormal operating, and emergency procedures;
 - b. assessment of level of knowledge achieved during operator qualification as evidenced by review of examination questions and examination results, and by selective oral examinations of operators by members of the review team;
 - c. assessment of conduct of operations by observation of actual waste handling operations using simulated waste containers, and the response to simulated

abnormal and emergency situations;

- d. assessment of the interrelationships and the delineation of roles and responsibilities among the various DOE (Carlsbad and Albuquerque) and contractor (Westinghouse and Sandia National Laboratory) organizations involved in the test phase;
- e. examination of records of tests and calibration of safety systems and other instruments monitoring Limiting Conditions of Operations or that satisfy Operating Safety Requirements; and
- f. verification of safety system as-built drawings by walkdown of selective systems.

John T. Conway, Chairman