

**[DNFSB LETTERHEAD]**

March 27, 1991

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

Dear Mr. Secretary:

On March 27, 1991, 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.

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: March 27, 1991

The principal safety issues to be resolved in connection with restart of the K-Reactor at the Savannah River Site have been assembled in the Reactor Operations Management Plan (ROMP) issued by the Savannah River Site contractor and updated on a number of occasions. These issues had been identified in the course of reviews by a number of organizations, including in-house groups of the DOE, a committee of the National Research Council of the National Academies of Science and Engineering, and the Savannah River contractor. The issues so identified have been divided into those that require resolution before the reactor is restarted, and those that can be addressed over a longer period. DOE has apparently found this process of definition and prioritizing of issues to be acceptable, and the Board has generally regarded it as orderly and competently done.

However, the Board considers the extension of this process to its culmination in closure of the issues as equally important, and has been carefully following its progression. This has largely been done through review of the issue closure packages as they have been received, and further discussion of them with representatives of the DOE and its contractor. The Board considers that it must comment on two aspects of the process.

First, it is seen that the closure packages, which are meant to document completion of the necessary work regarding each issue, contain mainly a list of the reports supporting a conclusion that the issue has been resolved, and the signatures of officials in the contractor's management chain concurring with the conclusion that closure has been achieved. There is no discussion of the relation of the reports to the issue itself, and no enlightenment is provided on the reason for concluding that the work has produced the desired objective.

During briefings by representatives of the DOE and its Savannah River Site contractor some months ago, Board members pointed out that closure packages of this form would cause difficulty to reviewers, including the Board, because of the failure to provide the logic to support conclusions. It was suggested that each closure package be headed by a brief discussion, stating the issue, the steps taken to address it, the basis for the conclusion that closure had been successful, and the relation of the referenced documents. This text need not be long. At this stage in the Board's review, the need for such documentary discussion is even more evident. Not only would it aid the Board in its review; it would show others how these problems of the past have been corrected.

Second, the Board is concerned that changes made to the process of final review and approval of closure of issues indicates a weakening of DOE's determination to assure itself of resolution of these problems of the past. Originally, DOE's formal concurrence was to be required for closure of each issue in the ROMP. DOE's concurrence is no longer required. It has been restated that closure of issues is to be dealt with in the DOE's Safety Evaluation Report (SER) when it is

issued. The current indication is that this will be done through discussion and description of the closure process, rather than through stating the DOE's position on closure of all specific issues.

The Board remains convinced that the issues covered by the ROMP represent real deficiencies in past practices, and that their correction is important. In its reviews of activities to resolve issues in the ROMP, the Board has observed numerous areas in which improvement was needed over the measures that had been considered by the contractor as satisfactory. These have been transmitted through formal recommendations and through informal observations that on the whole have helped to improve the restart activity in important and often essential ways. This convinces the Board that the closure packages deserve DOE's close attention, to the extent of restoring the original intention of approving the closure issue by issue. In the present situation, where the Board reviews each package to determine adequacy and the DOE does not, DOE is relying on the Board to do DOE's job.

In accordance with the above, the Board recommends:

1. that each closure package of an issue in the ROMP be provided with a brief narrative discussion that clarifies the meaning of the issue, describes the steps that were taken to resolve it, states the reason for concluding that closure has been achieved, and shows how the referenced documents support the claim of closure,
2. that the DOE revert to its earlier plan to fully review and concur with the determinations of each issue closure.

John T. Conway, Chairman