

**Department of Energy**

Washington, DC 20585

[APR 28 1994]

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

Dear Mr. Chairman:

Enclosed is the second quarterly status report for the Defense Nuclear Facilities Safety Board (DNFSB) Recommendation 93-4 Implementation Plan (IP). This report is being provided to you in accordance with the Department of Energy (DOE) Initiative 1 as identified in the accepted DNFSB Recommendation 93-4 IP. Three of the identified actions have been completed as scheduled and other actions have been rescheduled, following discussions with your staff.

As indicated in the enclosed report, the deliverables corresponding to the generic Technical Management Plan (TMP) and the Fernald TMP were transmitted to your staff as scheduled in December 1993. Additionally, the draft Hanford TMP was provided to your staff in January 1994. In meetings held with your staff on January 31, 1994, and February 17, 1994, your staff pointed out that the draft generic and Fernald TMPs (and the latter Richland TMP) lacked some of the features specified in the Recommendation and would not be useful as overall guidance for DOE operations office personnel in exercising their technical management responsibilities. To address these problems, a new approach was planned to revise the TMPs. This approach included establishing a Task Force consisting of the Fernald Field Office, the Richland Operations Office, and various Headquarters personnel to perform this activity. Additionally, a new schedule was developed in order to adequately address the problems and revise the TMPs. The generic TMP is scheduled to be submitted to you in final by May 30, 1994; the Fernald TMP is scheduled for submittal on or before July 31, 1994; and the Richland TMP is scheduled for submittal by June 30, 1994, prior to the startup of their environmental restoration contractor.

Other milestones connected to the revision and resubmittal of the TMPs have also been rescheduled. The activity to identify qualified key personnel at the DOE Fernald Field Office and Headquarters was originally completed in December 1993 with the TMP; however, due to this activity being an integral part of the revised TMPs, it has been rescheduled to be completed by May 30, 1994, for the Headquarters portion to correspond with the submittal of the generic TMP, and July 31, 1994, for completion of

## cc:

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O. Robertson, DOE/EM-433  
S. Robison, DOE/EM-44  
D. Smith, DOE/EM-62  
T. Sheridan, DOE/EM-20  
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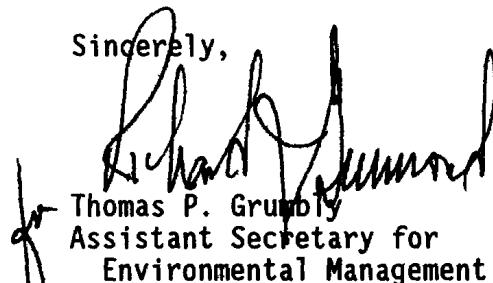
the Fernald portion to correspond to the submittal of the Fernald TMP. Additionally, the activity to assess initial compliance of Fernald with their TMP originally scheduled for March 30, 1994, has been rescheduled to take place September 1994, 2 months after the revised Fernald TMP has been in place. The milestone activity to present the completed TMPs to the Secretary's Contract Reform Committee and to the DOE Order 4700.1 Rewrite Committee was also rescheduled to correspond with the revision of the TMPs. Plans are still underway to present the TMPs upon their completion to the two committees.

On February 1 and 2, 1994, your staff was briefed on schedules related to the Uranyl Nitrate Hexahydrate Operational Readiness Review (ORR). The ORR Plan of Action, which is the deliverable associated with the restart procedure milestone, is currently in its second revision and is at DOE Headquarters for review. Once we have finalized the Plan for the ORR, we will provide to you a new milestone date for submittal of the restart procedure.

Also enclosed is a copy of the "Safe Configuration Assessment of the UNH Tank System Final Report," which was provided to your staff informally at the February 1, 1994, meeting at the Fernald Field Office, and a copy of the "Fernald Facility Representative Program and Training and Qualification Documents." These reports close out item number 934.E.2.b, Tank Integrity Study, and item number 934.F.2.b, Fernald Facility Representative Program and training qualification procedure, in the Recommendation 93-4 IP, respectively.

As specified in the 93-4 IP, the Department will continue to keep the Board apprised of our progress by providing future quarterly status reports and by providing the documentation associated with the deliverables for each action specified in the Plan.

Sincerely,



Thomas P. Grumbly  
Assistant Secretary for  
Environmental Management

3 Enclosures: Listed Below

1. Action Tracking DNFSB Recommendation 93-4 (enclosure to this letter) 94:2231
2. "Safe Configuration Assessment of the UNH Tank System Final Report," December 30, 1993 94:241
3. Facility Representative Documents:
  - \* FIP No. 5601, "Facility Representative Program," Revision A, February 15, 1994 94:955
  - \* FIP No. 5602, "Facility Representative Training and Qualification," Revision A, February 15, 1994 94:956

## ACTION TRACKING DNFSB RECOMMENDATION 93-4

Item Number	Description	Deliverable	Milestone	Assignee	Status
934.IP.1	Prepare Draft Implementation Plan	Draft Implementation Plan	September 30, 1993	Susan Peterman 301-903-7633 or 513-648-3135	Completed.
934.IP.2	EM Provide Draft Implementation Plan to DNFSB	Implementation Plan	September 30, 1993	Dave Kozlowski 301-903-8160	Completed.
934.IP.3	DNFSB Staff Comments on Implementation Plan		October 15, 1993	DNFSB	Completed.
934.IP.4	Begin concurrence process		October 22, 1993	Dave Kozlowski 301-903-8160	Completed.
934.IP.5	Submit IP to Executive Secretary for Secretary's signature		October 29, 1993	Dave Kozlowski 301-903-8160	Completed.
934.IP.6	Submit IP to Board		November 5, 1993	Dave Kozlowski 301-903-8160	Completed.

Item Number	Description	Deliverable	Milestone	Assignee	Status
934.A.2.(1)	A Technical Management Plan will be developed for Fernald	Technical Management Plan for Fernald	December 18, 1993	Susan Peterman 513-648-3135	Completed December 15, 1993. However, on January 31, 1994, a meeting was held with the DNFSB to discuss their comments on the generic and Fernald TMPs. At the meeting the DNFSB requested major revisions to the plans. Due to the extensive revisions required, EM, in agreement with the DNFSB, rescheduled this activity. The Fernald TMP will be resubmitted to the DNFSB on or before July 31, 1994.
934.A.2.(1).a	Reviewing the Environmental Restoration Program, EM-40 Management Plan (DOE/EM/RM/02) and Project Management Plan outline from DOE Order 4700.1 Project Management System to develop model for Technical Management Plan		November 15, 1993	Susan Peterman 513-648-3135	Completed.
934.A.2.(1).b	Establishing an outline of contents for the Technical Management Plan	Outline of Technical Management Plan	November 15, 1993	Susan Peterman 513-648-3135	Completed. However, as stated above in item 934.A.2.(1), regarding extensive revisions to the TMPs, the TMP outline was also requested by the DNFSB to be revised. The TMP outline was revised and resubmitted to the DNFSB on February 11, 1994. The new outline was accepted by the DNFSB with minor revisions on February 17, 1994.

Item Number	Description	Deliverable	Milestone	Assignee	Status
934.A.2.(1).c	Identifying qualified key personnel at DOE Fernald Field Office and Headquarters for technical direction, monitoring, and oversight of contractor performance for inclusion in the Technical Management Plan including necessary training to meet current performance expectations		December 18, 1993		Completed. However, as stated in item 934.A.2.(1) above, due to the revision of the TMPs, this activity is also undergoing revision. Identification of qualified technical key personnel for HQ and Fernald is a major part of the new TMPs that are being developed. New estimated completion date is May 30, 1994, for the Headquarters generic TMP, and a completion date of July 31, 1994, is scheduled for DOE Fernald Field Office TMP, which will include identification of key personnel.
934.A.2.(2)	A Technical Management Plan for Hanford will be developed	Technical Management Plan for Hanford	January 18, 1994	Roger Freeburg 509-376-6628	Initiated. Hanford informally delivered its TMP to the DNFSB on January 18, 1994. However, due to item 934.A.2.(1) above, the Hanford TMP is also undergoing major revision. The Hanford ERM was awarded in February 1994. However, the Hanford ERM will not begin work until June 30 1994, and before they can begin, their TMP must be in place. Therefore, Hanford is scheduled to deliver their TMP to the DNFSB on or prior to June 30, 1994.
934.A.2.(3)	Assess initial compliance of Fernald with the Technical Management Plan; and develop corrective action/implementation plan including schedule, as required	Submit documented results of assessment	March 30, 1994	Team	Due to the schedule change for the resubmittal of the TMPs (see 934.A.2(1)), this activity has also been rescheduled. The date to perform the initial compliance of Fernald with its TMP is now scheduled for September 30, 1994.

Item Number	Description	Deliverable	Milestone	Assignee	Status
934.A.2.(4)	A generic Technical Management Plan will be developed for future contracts	Generic Technical Management Plan	December 18, 1993	EM-424/Dave Kozlowski 301-903-8160	The draft Generic Technical Management Plan was completed December 17, 1993. However, due to 934.A.2(1), the new schedule for submittal of the generic TMP to the DNFSB is May 30, 1994.
934.A.2.(5)	Interface with and provide input for rewriting of DOE Order 4700.1 Project Management System to incorporate the requirements for implementation of a technical management plan		As required.	Mary McCune 301-903-8152	The final Technical Management Plan will be provided when available.
934.C.2.a	Interface with the committees during preparation of the technical management plans.		As required.		
934.C.2.b	Present completed technical management plans to the committees.		January 15, 1994	Mary McCune 301-903-8152	The final Technical Management Plan will be provided to the Committees upon completion.
934.C.2.c	Work with the committees to incorporate lessons learned from this process into their activities.		As required.	Mary McCune 301-903-8152	
934.C.2.d	Copies of committee reports will be provided to the DNFSB.	Contract Reform Team final report  Revised DOE Order 4700.1	December 31, 1993  May 31, 1994	Mary McCune 301-903-8152	Public Draft of the Contract Reform Team Report was issued February 1994, and was transmitted to the DNFSB in a letter dated April 4, 1994 to the Chairman of the DNFSB from the Assistant Secretary for Environmental Management. Final Contract Reform Team Report still pending.

Item Number	Description	Deliverable	Milestone	Assignee	Status
934.D.2.a	EH will complete their review of the Type B Investigation	Comments on Type B Investigation	October 15, 1993	Prakash Conjere 301-903-2443	Completed.
934.D.2.b	the EM-42 Deputy Office Director will lead the independent assessment	Initiate assessment	November 8, 1993	EM-42 Deputy Office Director 301-903-7216	Completed. Initial assessment was conducted the week of December 6, 1993. A follow-up to perform a root cause was completed the week of January 17, 1994.
934.D.2.c	the Fernald site will be assessed on how they are addressing the corrective actions recommended in the Type B Investigation				
934.D.2.d	the assessment and recommendations for Fernald will be documented	Submit assessment	December 18, 1993	EM-42 Deputy Office Director 301-907-7216	Completed. An Interim Assessment Report was transmitted on December 20, 1993. The final assessment report was transmitted to the DNFSB on February 4, 1994.
934.D.2.e	the corrective action plan will be developed and monitored		As required.	Mary McCune 301-903-8152	The final assessment conducted the week of January 17, 1994, did not identify any additional corrective actions; therefore, no corrective action plan is required. A letter closing out this activity has been drafted for signature by the Assistant Secretary for Environmental Management to the Chairman of the DNFSB, and is in concurrence.



Item Number	Description	Deliverable	Milestone	Assignee	Status
934.E.2.a	DOE will develop a restart procedure based on revised DOE Order 5480.31 and Operational Readiness Review Standard.	Restart procedure	December 31, 1993	Bud Kehew 513-648-3126	The DNFSB was briefed on schedules relating to the UNH Operational Readiness Review (ORR) in their visit to Fernald on February 1, 1994. The Restart Procedure identified in this activity is actually the ORR Plan of Action. Currently, revision 2 of the ORR Plan of Action is at DOE Headquarters for review as of March 17, 1994. This document must go through EM-1 for approval prior to transmittal to the DNFSB.
934.E.2.b	Complete a study on tank integrity of UNH tanks and, as appropriate, factor those results into the start-up procedure and schedule.	Tank Integrity Study	March 31, 1994	Bud Kehew 513-648-3126	Completed. The Tank Integrity Study was finalized December 31, 1993. This study was provided informally to the DNFSB staff at their visit to Fernald in February 1994. The Study is also provided along with the April, 1994, quarterly status report as a formal submittal to the Board.
934.E.2.c	Obtain approval by Assistant Secretary for Environmental Restoration and Waste Management for restart of the UNH process	Approval to restart	Upon completion of restart procedure	Bud Kehew 513-648-3126	

Item Number	Description	Deliverable	Milestone	Assignee	Status
934.F.2.a	Continue training and implementation of the proposed requirements for the Facility Representative Program as they are developed	Fully qualified Facility Representatives for Fernald	October 31, 1994	Ray Hansen 513-648-3119	The completion date for this activity has been changed to August 15, 1995. This schedule change was presented to the DNFSB staff on February 2, 1994. The schedule change was transmitted formally to the Chairman of the DNFSB in a letter dated April 4, 1994. Interim qualifications were identified in the Fernald Facility Representative Program and Facility Representative Training and Qualifications document which is included as an enclosure to the April 1994 quarterly status report.
934.F.2.b	Develop procedure for Fernald Facility Representative program and training and qualification	Fernald Facility Representative Program and training and qualification procedure	February 15, 1994	Doug Maynor 513-648-3173	Completed. The Facility Representative Program and training and qualification procedure was finalized and is being transmitted formally to the Chairman of the DNFSB as an enclosure to the April 1994 quarterly status report.
934.G	Submit quarterly status reports	Quarterly Status Reports	Issue 15 days after close of quarter; initial report January 15, 1994	Dave Kozlowski 301-903-8160	In process.