



Department of Energy

Washington, DC 20585

July 1, 1996

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

Dear Mr. Chairman:

In your letter of January 23, 1996, to Mr. Thomas P. Grumbly discussing the Department's study concerning a facility utilization strategy for the Savannah River Site chemical separation facilities, you requested that the Department submit within 90-days a report that describes the plan to define the future status of H-Canyon. Such a plan would be required if the Department were to adopt a strategy to consolidate operations to the F-Canyon facilities, as recommended in the study. The Department has not yet adopted this recommendation. Until a decision is made, we are continuing to proceed on the facility strategy defined in the Recommendation 94-1 Implementation Plan.

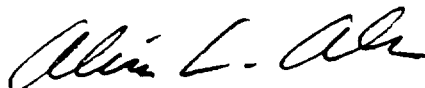
The schedule for developing a standby plan, if a consolidation decision were to be made, is October 1996 since the upgraded safety documentation for the H-Canyon, upon which much of the plan must be based, will not be complete until September 1996. The Department's original plan for responding to the Board's request was to provide a preliminary version of the actual standby plan itself, recognizing that portions of the plan would be incomplete at the time it was submitted. My staff, after meeting with your staff on May 10, 1996, to review the material developed to date in support of the plan, concluded that it would be premature to submit this preliminary information at this time. Rather, it was concluded that a description of the approach and rationale being used to develop the plan, as well as the schedule for the final plan, would be more appropriate to submit to meet your request. This information is provided in the enclosure.

As indicated above, we are continuing our preparations for restart of the H-Canyon on a schedule to support a September 1998 startup (including completion of upgraded safety documentation) while we further evaluate alternatives to the canyon operating strategy on which the Recommendation 94-1 Implementation Plan was based. Should a canyon consolidation strategy be adopted, we will work with your staff in developing the H-Canyon standby plan to assure that the standby condition of the H-Canyon would meet the Board's expectations. In that case, the final standby plan would be provided in October 1996 as indicated above.



If the current canyon strategy is revised, we will propose to the Board any changes to the Recommendation 94-1 Implementation Plan that may be required. If you have any questions or comments on this matter, please contact me or have your staff contact John Ford (301-903-3782) of my staff.

Sincerely,

A handwritten signature in cursive script, appearing to read "Alvin L. Alm".

Alvin L. Alm
Assistant Secretary for
Environmental Management

Enclosure

H-AREA STANDBY MANAGEMENT PLAN STATUS

H Canyon is currently adequately staffed and on schedule to achieve a September 1998 restart. The plan is to maintain staffing and move forward toward restart. If a decision is made to deviate from the plan to restart H Canyon and move toward Standby, the H-Area Standby Management Plan will be utilized for this contingency. The H-Area Standby Management Plan will define the scope of activities which will be performed during Standby to ensure the safe storage of nuclear material and the ability to restart all processes within two years. This plan will be issued by September 30, 1996.

During Standby, the primary mission of HB-Line will be to deinventory all process vessels in HB-Line to H Canyon vessels and to place the facility in a safe configuration for a potentially extended period of time. The HB-Line vault may or may not be immediately deinventoried. Staffing numbers and responsibilities will be provided to describe the minimum surveillance and maintenance activities that will be performed in HB-Line.

During Standby, H Canyon will remain inventoried and the primary mission will be the safe storage of nuclear material until the transfer of plutonium and neptunium solutions to F Canyon or the restart of the H Canyon HM Process. The Standby Management Plan will list all of the H Canyon vessels with nuclear material and describe the controls and surveillances which will be performed for each vessel to safely store material. The plan will also list the preventive maintenance, projects, and surveillances that will be performed during Standby.

The final Standby Management Plan will contain, as a minimum, the five areas addressed below. The status and path forward for each area is as follows:

1. A plan for maintaining the safety systems and programs identified in the facility's authorization basis in the transition to "de-inventoried standby", which is projected for 2001 and 2002.

Status:

The current approved H Canyon safety documentation is the H Canyon SAR through addendum 5.

Procedure 221-H-9118 is a seventy-six page procedure which describes the surveillance requirements for H Canyon and Outside Facilities safety class and safety significant systems based upon current safety documentation. This procedure has been recently approved to highlight the safety class and safety significant systems which are not required until restart of the HM process operations.

Preventive and corrective maintenance is currently performed on all safety systems. Concentration and chemistry controls are in place for all canyon vessels with SNM and bundle storage water analyses are being performed.

Path Forward:

The delivery of a Standby Management Plan is dependent on the incorporation of approved safety documentation (BIO and SAR addendum 6) and Linking Document Database (LDD). The schedule which drives the completion of the plan is attached. The BIO and LDD will provide the detailed information of the H Canyon and Outside Facilities safety class and safety significant systems which must be maintained and the surveillances to be performed during Standby.

All of the procedures and requirements for the prolonged storage of SNM such as plutonium, neptunium and uranium solutions will continue during Standby with the discipline of operations currently used until the storage vessels are de-inventoried.

2. Necessary maintenance of process equipment to ensure future operability.

Status:

Currently, all operating equipment as well as non-operating equipment is being maintained. This includes non-operating equipment needed for the HM-Process.

Path Forward:

The final Standby Management Plan will list the systems requiring corrective and preventive maintenance. Current plans are to discontinue preventive and corrective maintenance on a portion of the process equipment which will not be operating during Standby and which can quickly be repaired or replaced if required upon restart. Equipment that is costly or takes longer to replace such as the centrifuge will be routinely exercised and maintained during Standby.

3. Preventative maintenance plan for all equipment.

Status:

A well established preventative maintenance (PM) plan currently exists for almost all equipment. The PM program is well managed with minimal backlog. During May 1996, 223 PM work packages were issued and all but 15 have been completed as of 5/29/96. Most delays in PM occur due to difficulty in scheduling an outage during the assigned month.

Path Forward:

The final Standby Management Plan will list the systems requiring corrective and preventative maintenance during Standby, and include a plan for the PM of safety class and safety significant systems. Process equipment PM will be determined based upon the cost and duration of potential replacement.

4. Continued training and qualification programs for operators to be used at H Canyon.

Status:

The H Canyon operations training program is accredited. Training is currently provided for all operating and non-operating (HM-Process) watchstations. Qualifications and proficiency requirements are maintained for all operating watchstations. Training is performed on a fifth shift rotation.

Path Forward:

During Standby, training will be provided for operating watchstations. All HM-Process training currently being conducted for restart will cease. This includes Dissolving, Head End, HAW, 1st Cycle, 2nd Uranium Cycle and 2nd Product Cycle. Qualifications and proficiency requirements per our current accredited program will be maintained for all operating watchstations. Operating watchstations during Standby includes Cranes, LAW, Support Operator, Sample Aisle, 2nd/3rd Level, Gang Valves, Chem Storage, Patrol, A-Line, ARU, GP and Rerun. The final Standby Plan will provide a description of each operating watchstation. Training will most likely be performed during a four shift rotation. A training plan will be defined in detail in the final Standby Plan.

5. Definition of the time required to restart H Canyon processing from Standby.

Status:

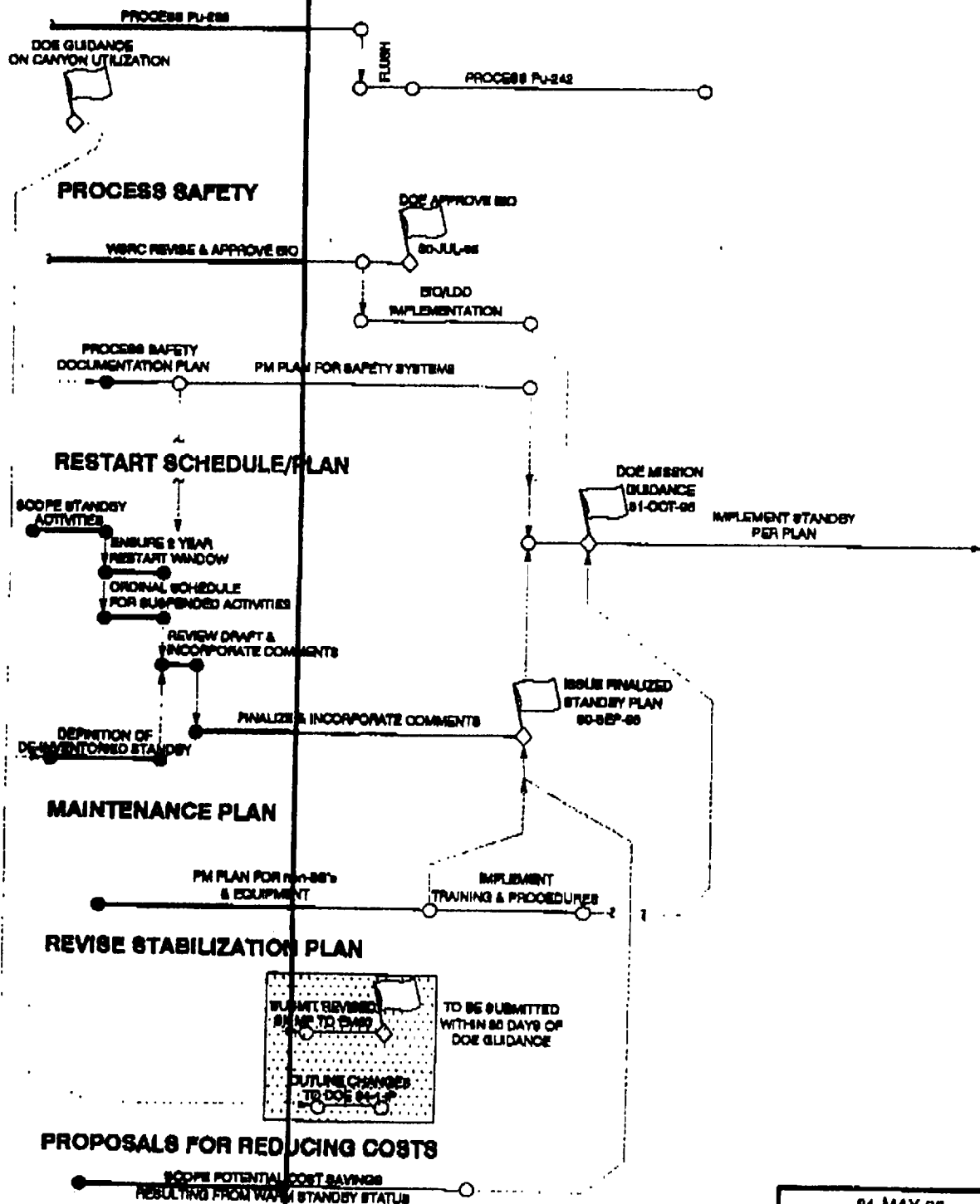
H Canyon is aggressively making progress to restart the HM-Process. If placed in Standby prior to completing all restart activities, some restart activities will continue to be performed during Standby.

Path Forward:

A schedule of restart activities, which would be required upon exiting Standby, has been created. This schedule indicates that it would take two years or less to restart H-Area facilities from Standby. The final Standby Management Plan will provide this restart schedule and the details for ensuring that a two year restart remains achievable.

H-AREA STANDBY PLAN

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31-MAY-96
CONTACT: G. ZACHMANN