

MAR 3 1998

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:

SUBJECT: Defense Nuclear Facilities Safety Board (DNFSB) Recommendation 96-1
Implementation Plan - Suspension of Restart Activities at the In-Tank Precipitation
(ITP) Facility

REFERENCE: Ltr, Schepens to Conway, "Defense Nuclear Facilities Safety Board
Recommendation 96-1 Implementation Plan - Program Status", 12/23/97

In the referenced letter, the Department of Energy (DOE) - Savannah River Operations Office (SR) committed to re-evaluate the strategy described in the Implementation Plan and to provide a formal action plan in March 1998 for bringing Recommendation 96-1 to closure. Since that time, as discussed with you on January 28, 1998, recent test results related to the ITP process indicate that the process can not be cost effectively implemented to meet safety and production objectives as currently configured. Therefore, ITP startup preparations have been suspended pending a comprehensive review of salt disposition alternatives, and the following actions have been initiated:

- 1) Ongoing and planned facility modification work is being reviewed to determine which activities to complete and which to suspend;
- 2) Ongoing analytical testing is continuing to further understand ITP chemistry, with emphasis on understanding threshold concentrations of catalyst(s);
- 3) A team of site and independent personnel with expertise in systems engineering, chemistry, nuclear safety, operations and programmatic risk assessment are being assembled by WSRC to perform an evaluation of salt disposition alternatives (evaluation expected to take 6 to 9 months);
- 4) A strategy is being developed for the timely implementation of an interim Authorization Basis at ITP pending completion of the alternatives evaluation, consistent with current chemistry understanding and with limited ITP storage and transfer operations;
- 5) The Defense Waste Processing Facility (DWPF) will continue to produce sludge-only canisters; and
- 6) Tank Farm plans are being evaluated to accommodate potential delays in salt removal.

DOE-SR will continue to provide oversight of WSRC activities, including detailed oversight of the alternatives evaluation. In addition, DOE is sponsoring an independent project evaluation team to oversee and validate the alternatives evaluation process and activities. This team will also provide continued independent project evaluations through the design, construction and startup phases following selection of the best alternative(s).

The suspension of startup activities and evaluation of salt disposition alternatives significantly impacts the plans envisioned at the time the referenced letter was submitted to you. Since there

are no intentions to restart ITP as currently configured, the following actions are being taken to address closure of Recommendation 96-1:

- 1) Complete ongoing ITP chemistry testing activities and document the test results;
- 2) Complete and issue planned chemistry program deliverables as defined by the Implementation Plan;
- 3) Suspend further development of any reports related to safety systems required for ITP processing or a plant sampling program to confirm laboratory findings;
- 4) Develop and issue a final report providing a basis for closure of the Recommendation which summarizes the results of the chemistry program; addresses the overall safety of the tetraphenylborate (TPB) chemistry products remaining in Tanks 48 and 49; and identifies any open items with respect to the commitments made in the Implementation Plan, associated test plans, and submitted deliverables.

If any of the issues raised in Recommendation 96-1 are also applicable to the selected salt disposition alternative(s), those issues will be evaluated and resolved with you and your staff prior to implementation of the alternative(s). Chemistry Program testing is expected to be completed and results documented so that the associated deliverables, final report, and request for closure can be achieved by May 15, 1998.

DOE-SR will continue to communicate and work with your staff as the chemistry program activities come to a conclusion and as the evaluation of salt disposition alternatives proceeds. Please direct any questions to me or W. F. Spader at (803) 208-7409.

Sincerely,

Original signed by
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Roy J. Schepens
Acting Assistant Manager
for High Level Waste

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PC-98-025

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