



Department of Energy

Washington, DC 20585

October 22, 2004

The Honorable John T. Conway
Chairman
Defense Nuclear Facilities Safety Board
625 Indiana Avenue, NW, Suite 700
Washington, DC 20004-2901

Dear Mr. Chairman:

The purpose of this letter is to respond to your September 8, 2004, letter regarding Integrated Safety Management System (ISMS) for the Hanford Tank Farms. We share your concerns, and the U.S. Department of Energy (DOE), Office of River Protection (ORP) site manager, Roy Schepens has communicated these concerns to the Tank Farms Contractor CH2M HILL Hanford Group, Inc. (CH2M HILL) and reduced the CH2M HILL fee by \$300,000 because of these concerns. A copy of the August 25, 2004, letter and the two reports identified in it have been provided to your staff.

CH2M HILL recently completed the root cause analysis for the July 2004, 244-CR Vault Thermocouple Removal event, identified corrective actions and completed a common cause analysis associated with five similar events referenced in the Schepens' August 4, 2004, letter. The results of the analysis identify workforce and management issues that are being addressed with compensatory actions and longer term improvement initiatives.

Compensatory measures have been implemented by Management Directive TFC-MD-038 "Compensatory Controls for Radiological Control Performance" (MD-038). MD-038 establishes a rigorous process for ensuring the adequacy of work packages for all high and medium risk work prior to work authorization. A formal process controlled by procedure has been established to categorize work as high, medium, or low risk. DOE Facility Representatives closely followed development of the compensatory measures and are closely monitoring their implementation. CH2M HILL is also assigning a Senior Supervisory Watch to medium and high risk radiological work to ensure performance is consistent with DOE expectations. These expectations include a conservative approach to planning when detailed radiological data is not available or the data is potentially unreliable. Radiation Work Permit (RWP) limits, actions required when RWP limits are reached, and steps to place the facility in a safe condition will be more clearly specified in the work instructions and extensively reviewed during pre-job briefings. ORP is also reviewing low risk work to validate that it is properly categorized as low risk.



ORP has established a Tank Farm ISMS Improvement Validation Team. This team is comprised of independent experts that will evaluate Tank Farm ISMS in two reviews. The first review will be completed by early November 2004. An interim briefing will be provided to the Board on the results. We will provide this briefing within the 60-day period established by your letter. The initial review will verify the adequacy of the CH2M HILL evaluation of events and corrective action determinations. A second review scheduled to begin March 7, 2004, will focus primarily on Field Operations and evaluate the adequacy of implemented improvements. The start date of the second review may be adjusted to ensure that most corrective actions are declared implemented and an adequate level of Field work activity is scheduled for the team to observe and evaluate. A final comprehensive written report will be prepared following the second review. The nature of the corrective actions planned by CH2M HILL and the length of time to implement these actions preclude the completion of the second review during the 60-day period.

The planned approach to addressing our mutual concerns utilizing the Tank Farm ISMS Improvement Validation Team is consistent with DOE Guide 450.4-1B, *Integrated Safety Management System Guide* (Volume 1), and has been discussed with your senior staff.

If you have any further questions, please call me at (202) 586-7709 or Mr. Roy Schepens at (509) 376-8052.

Sincerely,

A handwritten signature in black ink, appearing to read 'Paul M. Golan', with a long horizontal line extending to the right.

Paul M. Golan
Acting Assistant Secretary for
Environmental Management