



Regulatory Unit

Monthly Performance Report

March 2000

Office of Safety
Regulation of the
TWRS
Privatization
Contractor

May 2000
Environmental Management
Performance Report Submittal

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EXECUTIVE OVERVIEW

EXECUTIVE SUMMARY

Work continues to resolve significant issues prior to proceeding with Part B-2. During the reporting period, the Dose Assessment Methodology issue was closed following the RU's approval of the BNFL revised Dose Assessment Methodology. Other key issues being resolved are authorization basis (AB) maintenance, schedule for safety deliverable submission, and adherence to procedures.

The TWRS-P authorization basis maintenance process remains a significant issue. On February 24, BNFL submitted a revised response to the RU inspection findings. On March 1, the RU met with BNFL to discuss their revised response. Following the meeting, the RU determined the information presented lacked sufficient detail to conclude that BNFL's actions would completely address the issue. The RU has issued a Corrective Action Notice requesting a formal plan that provides commitments to specific corrective actions and completion dates. The RU will use the plan as a basis for monitoring progress on resolving the authorization basis maintenance issue. (The corrective action plan, which was received from BNFL on April 14, 2000, is being evaluated.)

BNFL has provided the RU with the impact on the schedule of safety deliverables due to the President's Budget providing fewer set aside funds than requested (\$450M versus \$606M) for next fiscal year. The major impact is a projected delay in the start of construction from July 2001 to December 2001. Based on this change in the start of construction, BNFL will submit the Construction Authorization Request for RU review and approval on February 1, 2001, two months later than previously planned.

Nearly all of the design phase RU inspections of BNFL have identified procedure compliance problems. To address this concern, BNFL established a team to determine the root causes of this problem. The results were presented to the RU management team during a workshop session. Related to the procedure compliance root cause investigation was an inspection Finding regarding failure to maintain the Authorization Basis (AB). In a second response to this Finding, dated February 24, 2000, BNFL presented a QA recovery plan to address the results of the root cause investigation for both the procedural compliance and AB maintenance issues. This second response provided BNFL's specific actions to resolve the AB maintenance Finding. In this response BNFL committed to align the AB with the Design on or before April 24, 2000. The RU has scheduled an inspection of BNFL's Corrective Action Program during the week of April 24-28, 2000, and among other things, will review the adequacy of BNFL's actions to address the AB maintenance Finding.

MONTHLY HIGHLIGHTS

Inspections

The RU performed an inspection of BNFL's Training and Qualification Programs, and identified one Finding. The inspectors found that they were unable to determine the effectiveness of the qualification process due to BNFL's lack of timely reporting. Based upon the review of recent contractor surveillances, self-assessment reports and procedure revisions, it was evident that the training and qualification processes were still

undergoing development. The completion of corrective actions from BNFL's self-assessment of the training program had begun with a Management Training Responsibilities and Requirements Orientation course first held on February 29, 2000, and attended by 120 contractor managers and leads.

Topical Meeting

During the March Topical Meeting the RU and BNFL discussed safety issues associated with the design of the TWRS-P melter and the associated offgas systems. Radioactive hazards were identified associated with the feed, melt, vitrified product, offgas, and NOx emissions from the low activity waste melter. These hazards were identified as significant hazards to plant workers. Strategies to prevent or mitigate the identified hazards were presented by BNFL. The next Topical Meeting is scheduled on April 25, 2000 to discuss chemical hazards.

Position Paper

The RU issued a Position paper on Conformance with Risk Goals. One component of the TWRS-P integrated safety management (ISM) process is to ensure that the risks from facility operations, including the risks from potential accidents, are limited. The paper describes an acceptable method of demonstrating conformance with the risk goals found in Section 3.0 of DOE/RL-96-0006, *Top-Level Radiological, Nuclear, and Process Safety Standards and Principles for TWRS Privatization Contractor*. There are three risk goals included in the radiological and nuclear safety objectives top-level standards document DOE/RL-96-0006, which are:

1. Operations risk goal
2. Accident risk goal
3. Worker accident risk goal

The RU has established positions that describe important aspects of an acceptable method to demonstrate conformance with these goals that consider the origin and intent of the risk goals and the unique characteristics of the TWRS-P facility, the Hanford Site, and the worker population.

Contract Discussions

The RU finalized its proposed contract changes necessary for Part B-2 of the TWRS-P effort, and provided them to the ORP Contracting Officer. While these changes represent a firm RU position, there remain several areas of contention with BNFL:

1. In the area of non-radiological worker safety and health, BNFL would like to see an inspection program that is modeled after OSHA procedures and is much less intrusive than what is planned.
2. Topical meetings will continue on a quarterly basis following Construction Authorization and will utilize the existing protocol. BNFL would like to weaken the protocol, but the RU believes that it is key to the conduct of an effective Topical meeting in which issue closure is achieved.

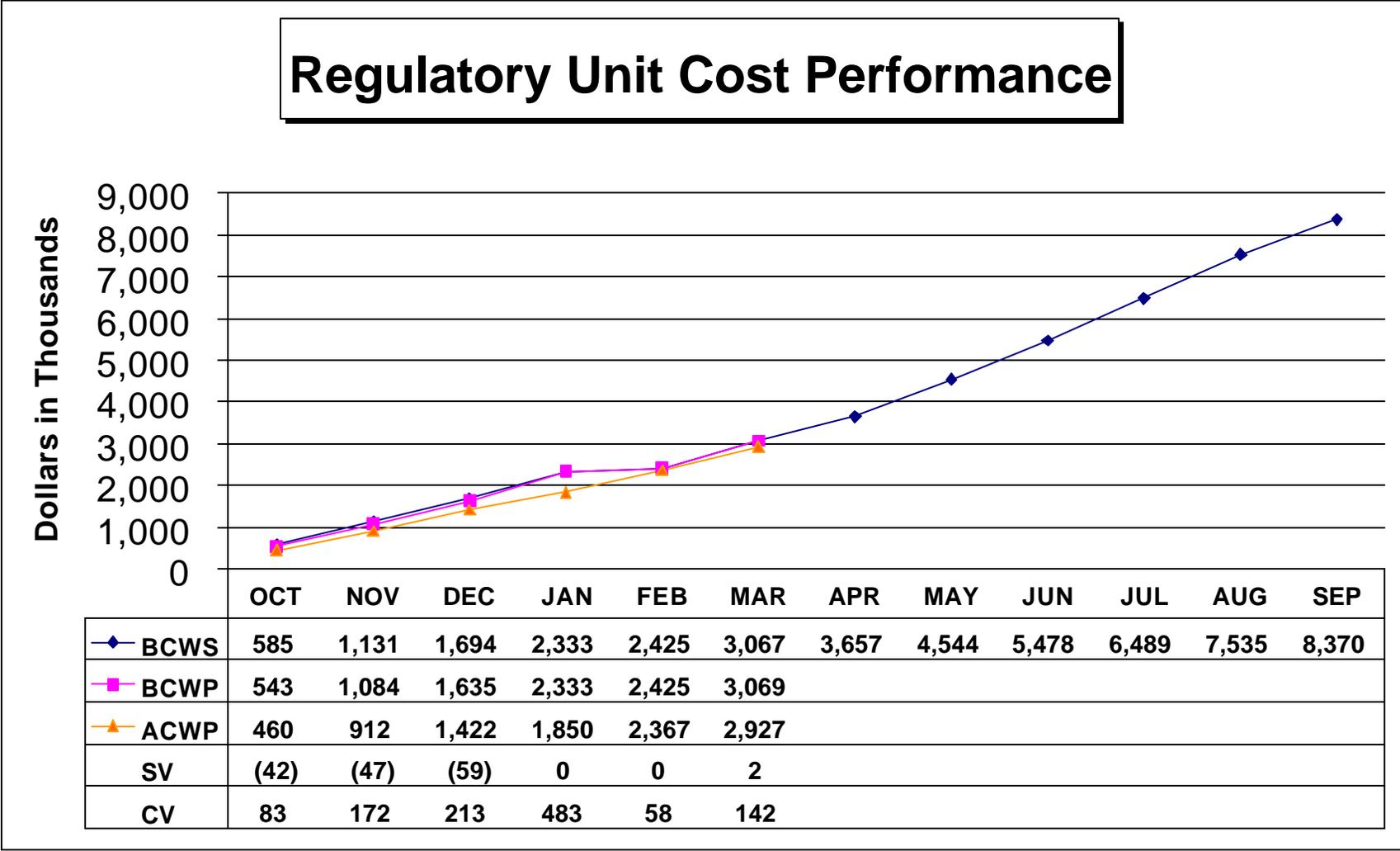
3. BNFL is permitted to incrementally submit an authorization request, if justified, but the prescribed timeframe for RU review doesn't begin until the last component has been received. BNFL would like the right to reach agreement on a compressed review time. Shortening of the review time must be reserved to the sole discretion of the Regulatory Official, based on the quality and content of the submitted components.
4. The RU position on Back-fits, conformance with which is a contractual requirement of the BNFL ISMP, has been changed to address a new regulatory interpretation of an existing requirement. BNFL has taken a wide-open stance regarding the potential sources of a new interpretation. The RU believes it illogical, a hamstringing of the Regulator, and a communication inhibitor.

Industrial Health and Safety Program

The RU is continuing to define a comprehensive program for regulating non-radiological worker safety and health (IH&S). While the start of construction is not scheduled until after the first of the calendar year, BNFL is currently defining and documenting their construction safety program. The RU is scheduled to receive the BNFL "Non-radiological Worker Safety and Health Plan" for review and approval on April 24, 2000. The status of the IH&S regulatory program is:

- Policy and Memorandum of Agreement (MOA) - these documents are essential to documenting the RU's authority to regulate IH&S. The final draft documents were issued this month for signature by EH-1, EM-1 and S-3 (Policy only) by memo from the Manager, RL.
- Regulatory Plan - this plan describes the process the RU will follow internally in regulating IH&S. The Regulatory Plan was sent to BNFL for review and comment on March 3, 2000. No comments have been received to date.
- Position Paper - the RU's position on regulating IH&S was revised (revision 2) and sent to BNFL for review and comment on March 2, 2000. No comments have been received to date.
- Review Guidance - BNFL comments on the draft review guidance for the Non-radiological Worker Safety and Health Plan were received. The guidance will be revised and issued in early April.
- Review Planning Handbook - A detailed description of how the RU will conduct the review of the April 24, 2000, BNFL submittal was completed and circulated for internal review. The Planning Handbook contains specific assignments by reviewer, detailed review schedules, and expanded guidance to reviewers. The final handbook will be issued in mid-April.
- Inspection Program - the Verification and Compliance Officer and his staff are defining a comprehensive IH&S inspection program. (The basic scope of the program was provided to BNFL as part of the Regulatory Plan.)

COST PERFORMANCE (Graph)



COST PERFORMANCE SUMMARY

The fiscal year-to-date cost through March reflects a favorable cost variance of \$142K. This variance is a result of lower than anticipated costs associated with the development of the CAR planning review handbook and the resolving of Topical Issues. All activities are currently performing on or are very close to the baseline schedule.

NEAR-TERM LOOK AHEAD

Planned Due Date

April

- Issue Training & Qualification Inspection Report 4-05-00
- Issue QAPIP Review Handbook 4-14-00
- Conduct Corrective Actions Inspection 4-24-00
- Conduct Topical Meeting on Chemical Hazards 4-25-00
- Commence Review of BNFL IH&S Program Description 4-25-00

May

- Issue IH&S Regulatory Plan 5-11-00
- Issue SAP Review Handbook 5-12-00
- Conduct Standards Implementation Inspection 5-15-00
- Issue LCA Review Handbook 5-17-00
- Present 14th Quarterly Briefing to Headquarters 5-18-00
- Conduct Topical Meeting on 2nd Iteration: Hazards Control Strategies 5-23-00
- Issue Corrective Action Inspection Report 5-30-00

June

- Issue CAR Review Handbook 6-09-00
- Conduct QA Inspection 6-12-00
- Issue Standards Implementation Inspection Report 6-19-00
- Commence Review of BNFL LCA Request 6-27-00

PROGRAM PERFORMANCE OVERVIEW

PERFORMANCE SUMMARY (Chart) – Program Direction and Program Support

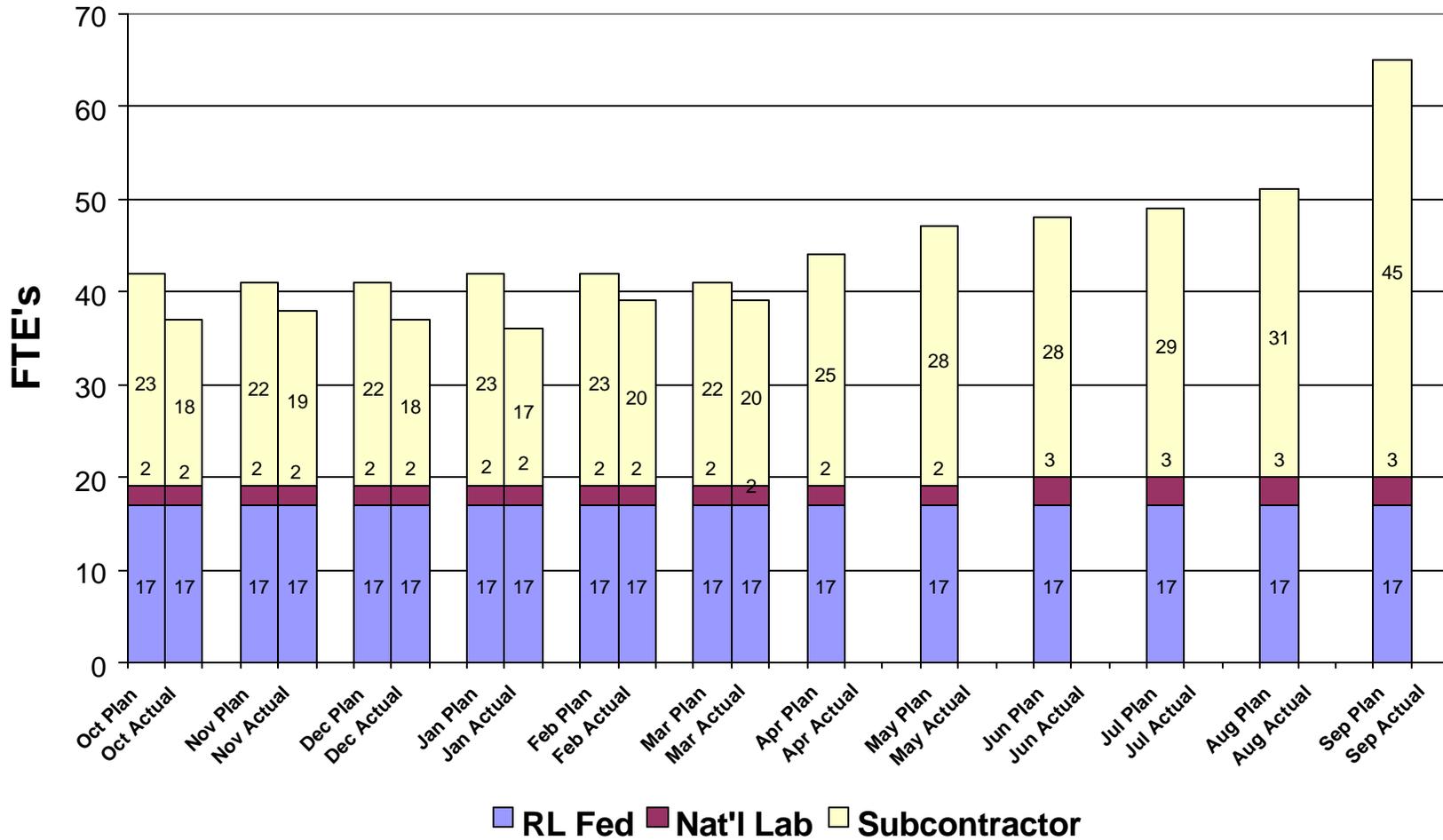
	STATUS thru March					FY 2000		
	BCWS	BCWP	ACWP	SV	CV	BAC	EAC	Delta
RU1 Program Management								
Program Direction	617	617	646	0	(29)	1,290	1,403	(113)
Program Support	831	831	788	0	43	1,882	1,770	112
Total RU1	1,448	1,448	1,434	0	14	3,172	3,173	(1)
RU2 Regulatory Policy & Practices								
Program Direction	69	66	68	(3)	(2)	105	120	(15)
Program Support	135	134	123	(1)	11	371	419	(48)
Total RU2	204	200	191	(4)	9	476	539	(63)
RU5 Recurring Safety Reviews								
Program Direction	210	210	202	0	8	424	395	29
Program Support	594	586	536	(8)	50	1,351	1,337	14
Total RU5	804	796	738	(8)	58	1,775	1,732	43
RU6 Construction Authorization								
Program Direction	66	73	49	7	24	440	206	234
Program Support	92	99	71	7	28	1,485	419	1,066
Total RU6	158	172	120	14	52	1,925	625	1,300
RU9 Oversight & Inspections								
Program Direction	143	143	133	0	10	305	183	122
Program Support	286	286	272	0	14	624	597	27
Total RU9	429	429	405	0	24	929	780	149
RU10 Special Projects								
Program Direction	7	7	10	0	(3)	7	10	(3)
Program Support	17	17	29	0	(12)	86	29	57
Total RU10	24	24	39	0	(15)	93	39	54
Total Regulatory Unit								
Program Direction	1,112	1,116	1,108	4	8	2,571	2,317	254
Program Support	1,955	1,953	1,819	(2)	134	5,799	4,571	1,228
Total RU	3,067	3,069	2,927	2	142	8,370	6,888	1,482

MILESTONE CONTROL LOG

<i>MILESTONE CONTROL LOG</i>							
<i>MILESTONE</i>		<i>WBS</i>	<i>MILESTONE DESCRIPTION</i>	<i>BASELINE COMPLETION DATE</i>	<i>SCHEDULE STATUS</i>	<i>FORECAST COMPLETION DATE</i>	<i>ACTUAL COMPLETION DATE</i>
<i>TYPE</i>	<i>NUMBER</i>						
<u>FISCAL YEAR 2000</u>							
RL	00-010	RU902	Standards Selection Inspection rpt issued	10/12/99	Complete	10/06/99	10/06/99
RL	00-011	RU902	Authorization Basis Inspection rpt issued	11/08/99	Complete	12/13/99	12/13/99
RL	00-012	RU902	Safety Integration Inspection rpt issued	12/07/99	Complete	12/03/99	12/03/99
FO	00-013	RU203	IH&S Plan issued	4/07/00	Behind	5/11/00	
FO	00-015	RU205	Revised Interface Plan issued	1/31/00	Complete	1/31/00	1/28/00
RL	00-016	RU902	Design Process Inspection rpt issued	2/14/00	Complete	2/14/00	2/08/00
RL	00-017	RU902	Employee Concerns Program Inspection rpt issued	3/13/00	Complete	3/13/00	3/10/00
RL	00-018	RU902	Training & Qualifications Inspection rpt issued	4/07/00	Complete	4/15/00	4/05/00
RL	00-019	RU608	SAP Rvw Handbook issued	5/12/00	On Schedule	5/12/00	
RL	00-027	RU608	Initiate Review of SAP	5/15/00	On Schedule	5/16/00	
RL	00-020	RU605	LCA Rvw Handbook issued	5/17/00	On Schedule	5/17/00	
FO	00-004	RU502	ER & Approval of QAPIP Rev. 6 issued	7/19/00	On Schedule	6/09/00	
RL	00-014	RU902	Standards Implementation Inspection rpt issued	6/19/00	On Schedule	6/19/00	
RL	00-026	RU605	Initiate Review of LCA Request	6/26/00	On Schedule	6/26/00	
FO	00-002	RU204	Openness Plan Rev. 3 issued	6/30/00	On Schedule	6/30/00	
RL	00-021	RU902	QA Inspection rpt issued	7/17/00	On Schedule	7/17/00	
RL	00-022	RU602	CAR Rvw Handbook issued	6/09/00	On Schedule	7/21/00	
FO	00-023	RU502	Approval of RPP Rev. #3 issued	8/18/00	On Schedule	7/28/00	
RL	00-024	RU902	Corrective Actions Inspection rpt issued	5/30/00	On Schedule	8/11/00	
RL	00-025	RU902	ALARA Inspection rpt issued	9/11/00	On Schedule	9/11/00	
FO	00-003	RU102	FY 2001 PMP issued	9/29/00	On Schedule	9/29/00	

FULL-TIME EQUIVALENCY PROFILE (Graph)

Regulatory Unit FTE Profile



CHANGE CONTROL STATUS LOG

<i>Regulatory Unit FY 2000 Change Control Log</i>							
CIN#	Change Classified.	Author	WBS#	Date Change Originated	Change Request Explanation	CEB Review Date	CEB Disposition
00-001	I	K.D. Grindstaff	1.10	11/99	Processing of the FY 1999 Carryover into FY 2000 Baseline and Realignment of FY 2000 Cost Savings to Emergent Priority Workscope.	11/24/99	Approved
00-002	II	K.D. Grindstaff	1.10	12/99	Added new emergent workscope associated with impact risk balancing between TWRS and the TWRS-P facility.	12/03/99	Approved
00-003	III	K.D. Grindstaff	1.10	1/99	Redistributed funds associated with a task package titled Other Direct Cost (0424ODC).	01/18/00	Approved
00-004	II	K.D. Grindstaff	1.10	1/99	Renamed Cost Account RU1002 from K Basin SAR to Misc. RU Reg. Activities and separated the CAP into three tasks; K Basin SAR, RL Quality Assurance Program Plan, and WIPP Reg. Program Development.	01/20/00	Approved
00-005	I	K.D. Grindstaff	1.10	2/99	Implemented the most recent resource/activity planning effort, utilizing the Project's FYTD cost savings. Mid-year rebaselining effort.	02/25/00	Approved