



Regulatory Unit

Monthly Performance Report

September 2000

Office of Safety
Regulation of the
RPP-WTP
Contractor

November 2000
Environmental Management
Performance Report Submittal

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EXECUTIVE OVERVIEW

EXECUTIVE SUMMARY

On May 8, 2000, U.S. Secretary of Energy Bill Richardson announced that he would terminate the BNFL Inc. privatization contract and seek bidders for a new contract to be awarded early in the next calendar year. On August 31, 2000, the request for proposal (RFP) under a different contracting approach to continue the design, construction, and commissioning of the waste treatment plant project was issued. The new contract is expected to be in place by January 15, 2001. These events have resulted in a decision to transition the Regulatory Unit's (RU's) organization and workscope to the Office of River Protection (ORP), and future monthly reporting will be to that office.

Highlights of fiscal year 2000 are captured below.

INTEGRATED SAFETY MANAGEMENT (ISM) APPROACH

The RU confirmed implementation of Safety Management six months ahead of the Department's goal of September 30, 2000. Standard 4 of the Contract's Statement of Work required BNFL to "develop and implement an integrated standards-based safety management program." The contract approach to safety required compliance with applicable laws, regulations, and requirements; conformance to DOE-stipulated top-level safety standards and principles; and adherence to the DOE process for establishing safety standards and requirements. The process for establishing safety standards was based on the principles of ISM. The RU emphasized that a clear, central concept of ISM was that contractors should tailor the basic framework for ensuring protection of the public, workers and the environment to the specifics of their work. This concept emphasized the need to fit the safety measures to the specific hazards of the work. The Contract provided for initial and subsequent approvals of changes to the Contractor's Integrated Safety Management Plan (ISMP) and ongoing assessment of the Contractor's ISMP implementation. These provisions, executed under the authority and means established by the Regulatory Official, demonstrated that ISM had been implemented for the Contract.

INDUSTRIAL HYGIENE AND SAFETY (IH&S)

The RU developed an IH&S Regulatory Plan. The original belief was that the Occupational Safety and Health Administration (OSHA) would regulate the IH&S of the RPP-WTP Contractor. OSHA declined, and in order to ensure that an adequate IH&S regulatory program was defined and in place before the start of construction, Dr. Carolyn Huntoon named the RU as the DOE element responsible for regulating occupational safety and health. The RU defined a comprehensive program for regulating IH&S, and issued the Regulatory Plan in May 2000.

In April 2000, the RU received the BNFL plan for protecting workers, subcontractors, and visitors from non-radiological hazards. The plan covered the period from the start of limited construction through cold startup. The RU completed an initial review and found the plan to be acceptable for a formal, detailed review. The RU completed its formal review of the BNFL Non-radiological Worker Safety and Health Plan and provided comments to BNFL. Although the document was available to the public and the document was provided to the Confederated Tribes and Bands of the Yakama Nation at their request, no external comments were

received. Due to contract termination, BNFL was unable to respond to the RU's comments; accordingly, the RU documented its review and issued an Assessment Report. The RU found that the BNFL Plan was acceptable subject to three conditions:

1. Addition of a clear statement of who has ultimate responsibility for safety.
2. Definition of the terms "stop work," "imminent danger," and "unsafe acts or conditions."
3. Commitment to completing and implementing the equipment and tool inspection program before start of construction.

As a result of the RU reporting changes, IH&S regulatory responsibility will be transferred to ORP Office of Environmental, Safety, Health, and Quality (ESH&Q).

REVIEW OF THE BNFL PART B-1 FACILITY AND PROCESS DESIGN DELIVERABLES

At the request of ORP, the RU completed its review of BNFL's Part B-1 facility and process design deliverables. The RU review team consisted of RU staff, RU contractors, and U.S. Nuclear Regulatory Commission (NRC) staff from the Special Projects Branch.

The RU reviewers determined that the BNFL facility and process design documents were not at a level of detail required to support the Hazard Analysis Report (HAR) or the Preliminary Safety Analysis Report (PSAR). In the absence of the required information regarding which standards BNFL had invoked, it was not possible to determine if the design achieved adequate safety. Additional design information required to support the Construction Authorization Request (CAR) included further development of the design integrated with identification of items that have been determined to be important to safety.

SELF-ASSESSMENT OF THE RU'S READINESS-TO-PROCEED INTO PART B-2 OF THE RPP-WTP CONTRACT

The RU performed a self-assessment to determine if management systems and processes were in place to accomplish assigned regulatory functions. The self-assessment examined ten areas of interest against specific review criteria. The team reviewed project documents and interviewed personnel from the RU and its support contractors, RL, ORP, DOE-Headquarters, the NRC, and BNFL.

In general, the team concluded that the RU management systems and processes are in place to accomplish the RU's responsibilities during Part B-2, and that the RU is effectively managing the regulatory program. In particular, the RU accomplished its regulatory responsibilities as outlined in RL/REG-97-10, *Regulatory Plan*, which defines implementation objectives of DOE/RL-96-25, *Policy for Safety Regulation of the RPP Waste Treatment Plant Contractor*, and DOE/RL-96-26, *Memorandum of Agreement for Safety Regulation of the RPP Waste Treatment Contractor*.

TOPICAL MEETINGS, INSPECTIONS & DESIGN REVIEWS

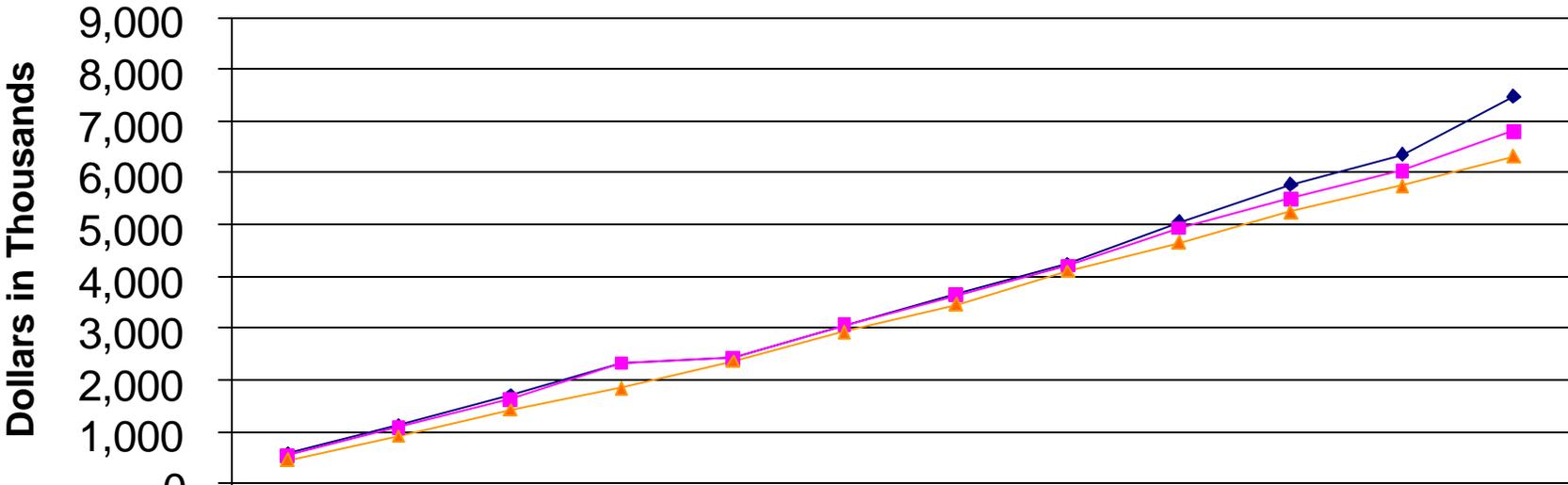
The RU conducted 8 Topical Meetings, observed 47 Design Reviews, and completed 7 Inspections of BNFL during FY 2000. The topical meetings provided a mechanism for addressing issues which the Initial Safety Analysis Report review identified as not adequately resolved. The Design Reviews contributed to the RU's

mission by providing detailed information concerning structures, systems and components that are important to safety and that are part of the facility design. The Inspections provided oversight in accordance with the contract with BNFL Inc.

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COST PERFORMANCE (Graph)

Regulatory Unit Cost Performance



	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP
◆ BCWS	585	1,131	1,694	2,333	2,425	3,067	3,657	4,232	5,045	5,774	6,362	7,475
■ BCWP	543	1,084	1,635	2,333	2,425	3,069	3,640	4,215	4,930	5,498	6,037	6,808
▲ ACWP	460	912	1,422	1,850	2,367	2,927	3,455	4,098	4,652	5,247	5,750	6,319
SV	(42)	(47)	(59)	0	0	2	(17)	(17)	(115)	(276)	(325)	(667)
CV	83	172	213	483	58	142	185	117	278	251	287	489

COST PERFORMANCE SUMMARY

The FY 2000 fiscal year end performance reflected an unfavorable schedule variance of \$667K and a favorable cost variance of \$489K. The unfavorable schedule variance is due to various delays in receipt of deliverables for RU review (SAP, LCAR, CAR) as a result of the BNFL contract termination. The favorable cost variance is a result of lower than anticipated costs associated with developing Inspection procedures, observing Design Reviews and resolving Topical Issues.

NEAR-TERM LOOK AHEAD

The termination of the BNFL contract and the impending transition of the RU to ORP have impacted a majority of FY 2000 and FY 2001 RU work activities. Planned first quarter activities include:

October - December

- Review CHG Radiological Protection Program for Construction
- Evaluate CHG capability to safely change the authorization basis
- Participate in K-Basin Operational Readiness Reviews

PROGRAM PERFORMANCE OVERVIEW

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PERFORMANCE SUMMARY (Chart) – Program Direction and Program Support

		DOLLARS IN \$000's					FY 2000		
		BCWS	BCWP	ACWP	SV	CV	BAC	EAC	Delta
RU1	Program Management								
	<i>Program Direction</i>	\$1,461	1,461	1,586	0	(\$125)	\$1,462	1,586	(\$124)
	<i>Program Support</i>	1,655	1,655	1,651	0	4	1,656	1,651	5
	Total RU1 -----	3,116	3,116	3,237	0	(121)	3,118	3,237	(119)
RU2	Regulatory Policy & Practices								
	<i>Program Direction</i>	141	141	137	0	4	143	137	6
	<i>Program Support</i>	410	410	371	0	39	410	371	39
	Total RU2 -----	551	551	508	0	43	553	508	45
RU5	Recurring Safety Reviews								
	<i>Program Direction</i>	437	406	390	(31)	16	435	390	45
	<i>Program Support</i>	1,406	1,247	1,112	(159)	135	1,406	1,112	294
	Total RU5 -----	1,843	1,653	1,502	(190)	151	1,841	1,502	339
RU6	Construction Authorization								
	<i>Program Direction</i>	245	158	91	(87)	67	245	91	154
	<i>Program Support</i>	401	150	144	(251)	6	402	144	258
	Total RU6 -----	646	308	235	(338)	73	647	235	412
RU9	Oversight & Inspections								
	<i>Program Direction</i>	278	223	205	(55)	18	276	205	71
	<i>Program Support</i>	599	515	392	(84)	123	598	392	206
	Total RU9 -----	877	738	597	(139)	141	874	597	277
RU10	Special Projects								
	<i>Program Direction</i>	\$9	9	41	0	(\$32)	\$9	41	(\$32)
	<i>Program Support</i>	433	433	199	0	234	432	199	233
	Total RU10 -----	\$442	442	240	0	\$202	\$441	240	\$201
Total Regulatory Unit Program									
	<i>Program Direction</i>	\$2,571	2,398	2,450	(173)	(\$52)	\$2,570	2,450	\$120
	<i>Program Support</i>	4,904	4,410	3,869	(494)	541	4,904	3,869	1,035
	Total RU Program -----	\$7,475	6,808	6,319	(667)	\$489	\$7,474	6,319	\$1,155

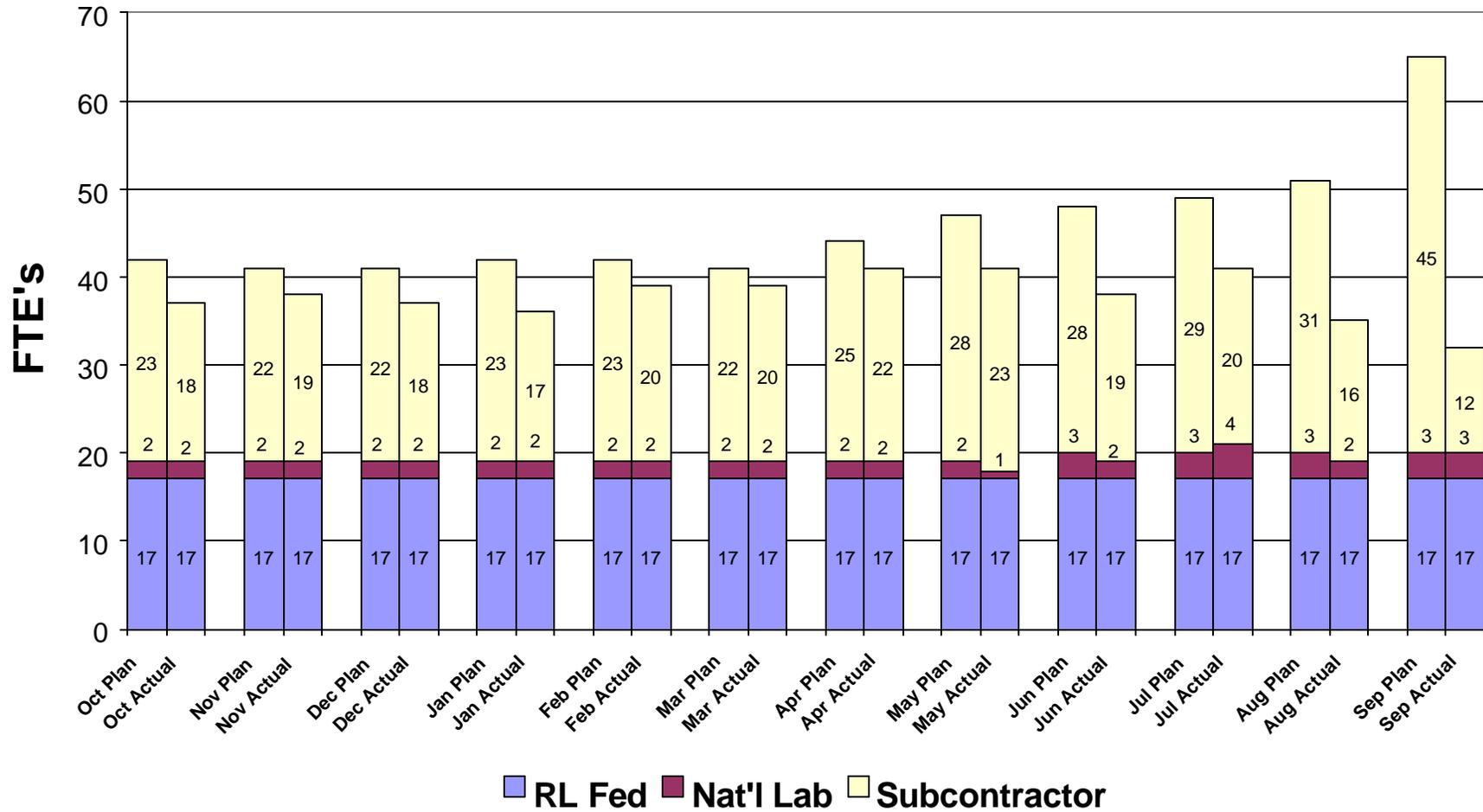
MILESTONE CONTROL LOG

MILESTONE CONTROL LOG							
MILESTONE		WBS	MILESTONE DESCRIPTION	BASELINE COMPLETION DATE	SCHEDULE STATUS	FORECAST COMPLETION DATE	ACTUAL COMPLETION DATE
TYPE	NUMBER						
<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	5/10/00	Complete	5/10/00	5/10/00
FO	00-015	RU205	Revised Interface Plan issued	1/31/00	Complete	1/28/00	1/28/00
RL	00-016	RU902	Design Process Inspection rpt issued	2/14/00	Complete	2/08/00	2/08/00
RL	00-017	RU902	Employee Concerns Program Inspection rpt issued	3/13/00	Complete	3/10/00	3/10/00
RL	00-018	RU902	Training & Qualifications Inspection rpt issued	4/07/00	Complete	4/05/00	4/05/00
RL	00-019	RU608	SAP Rvw Handbook issued	7/31/00	Complete	7/31/00	7/21/00
RL	00-027	RU608	Initiate Review of SAP	6/29/01	On Schedule	6/29/01	
RL	00-020	RU605	LCAR Planning Handbook issued	6/16/00	Complete	6/16/00	6/16/00
FO	00-004	RU502	ER & Approval of QAPIP for construction issued	6/26/01	On Schedule	6/26/01	
RL	00-014	RU902	Standards Implementation Inspection rpt issued	9/29/00	TBD	TBD	
RL	00-026	RU605	Initiate Review of LCA Request	6/27/00	Complete	6/27/00	6/27/00
FO	00-002	RU204	Openness Plan Rev. 3 issued	6/30/00	Complete	6/30/00	6/30/00
RL	00-021	RU902	QA Inspection rpt issued	7/28/00	TBD	TBD	
RL	00-022	RU602	CAR Planning Handbook issued	8/23/01	On Schedule	8/23/01	
FO	00-023	RU502	Approval of RPP for LCA issued	6/19/01	On Schedule	6/19/01	
RL	00-024	RU902	Corrective Actions Inspection rpt issued	5/30/00	Complete	5/31/00	5/31/00
RL	00-025	RU902	ALARA Inspection rpt issued	9/11/00	TBD	TBD	

MILESTONE CONTROL LOG							
MILESTONE		WBS	MILESTONE DESCRIPTION	BASELINE COMPLETION DATE	SCHEDULE STATUS	FORECAST COMPLETION DATE	ACTUAL COMPLETION DATE
<i>TYPE</i>	<i>NUMBER</i>						
FO	00-003	RU102	FY 2001 PMP issued	9/29/00	Complete	9/29/00	9/26/00

FULL-TIME EQUIVALENCY PROFILE (Graph)

Regulatory Unit FTE Profile



CHANGE CONTROL STATUS LOG

Regulatory Unit FY 2000 Change Control Log							
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	1/00	Redistributed funds associated with a task package titled Other Direct Cost (0424ODC).	1/18/00	Approved
00-004	II	K.D. Grindstaff	1.10	1/00	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.	1/20/00	Approved
00-005	I	K.D. Grindstaff	1.10	2/00	Implemented the most recent resource/activity planning effort, utilizing the Project's FYTD cost savings. Mid-year rebaselining effort.	2/25/00	Approved
00-006	II	K.D. Grindstaff	1.10	5/00	Initiated the detailed review of the BNFL process and facility design, which will provide the RU a current understanding of the BNFL process and facility design.	5/02/00	Approved
00-007	I	K.D. Grindstaff	1.10	5/00	Aligned the RU to the latest BNFL schedule delay prior to the decision to terminate the BNFL Hanford Contract.	5/30/00	Approved
00-008	II	K.D. Grindstaff	1.10	6/00	Implemented workscope to support decisions related to the relative risk of TWRS compared to the TWRS-P facility.	6/22/00	Approved
00-009	II	K.D. Grindstaff	1.10	7/00	This change request documented \$750K of Programmatic efficiencies that are being made available for other Hanford Site priority workscope. This is a funds only change request.	8/02/00	Approved
00-010	I	K.D. Grindstaff	1.10	9/00	This BCR bridges the RU's detailed CAP planning from FY 2000 to FY 2001.	9/26/00	Approved