

SUMMARY

The TWRS Regulatory Unit (RU) consists of the Office of Safety Regulation of the Tank Waste Remediation System (TWRS)-Privatization Contractor, WBS 1.10.1.1 (Project Baseline Summary [PBS] RG01). PBS RG01 defines the cost and schedule baseline associated with Program Support (subcontractor and national laboratory personnel) and is the focus of this section.

The Regulatory Unit conducted an initial inspection of Safety Integration of the BNFL design. The inspection assessed integration aspects of the contractor's ISM program, safety oversight, and safety culture. The inspection resulted in one finding where the contractor was not following procedures. This finding was not considered significant. Inspection results are described below:

- BNFL was adequately managing the integration of safety throughout the organization
- Safety committees were addressing safety issues at most levels of the operations
- BNFL had developed an effective safety improvement program to address industrial safety concerns
- Safety integration was evident throughout the contractor's design process
- BNFL management and staff reflected a strong integrated safety culture that was evident in all areas reviewed.

The Regulatory Unit conducted a follow-up inspection of BNFL's performance in maintenance of the authorization basis. The follow-up inspection resolved inconsistencies identified while documenting inspection findings from the October 1999 Authorization Basis Management inspection. The inspectors identified two findings in the follow-up inspection. The findings included: 1) modifying a quality-related record without first obtaining review and approval by the originating organization; 2) two examples of failure to follow quality-related procedures.

These findings combined with the two findings identified during the initial inspection indicate that additional BNFL management attention is warranted in maintaining the authorization basis current. The inspections contribute to the RU mission by providing oversight in accordance with the contract with BNFL Inc.

The RU observed five single discipline design reviews and a Design Committee meeting. The reviews contribute to the RU mission by providing detailed information concerning structures, systems and components that may be part of the TWRS Privatization facility design. The design reviews observed by the RU staff were:

- Pretreatment Ion Exchange System Piping and Instrumentation Diagrams
- Uninterruptible Power Supply Specification and Data Sheet
- Pretreatment Laboratories, Sampling, and Maintenance
- HLW Melter Removal and HLW and LAW Facility Solid Waste Handling
- Process Design Philosophy

BNFL deferred three multi-discipline design reviews of the primary facility layouts from October to the December/January timeframe due to an effort to reduce the size of the primary facilities and reduce costs. Five design reviews are planned for December.

BNFL and the Regulatory Unit conducted a topical meeting to discuss the results of the BNFL integrated safety management (ISM) Cycle 1 evaluation of hazards, control strategies, design basis events and standards selection. In ISM Cycle 1 BNFL evaluated work hazards and established control strategies for the evolving design. In ISM Cycle 2 BNFL will refine further the hazard analysis and control strategy selection, select construction and operating standards and identify design basis events. BNFL indicated the results of Cycle 1 will be used as the starting basis for its ISM Cycle 2 process. The results of Cycle 2 will be discussed in a future topical meeting between BNFL and the Regulatory Unit. The Topical Meetings contribute to the RU mission by reaching closure on previously identified technical issues.

Dr. Clark Gibbs and Mr. Robert Griffith of the RU met with representatives of DOE Headquarters, the U.S. Nuclear Regulatory Commission (NRC), and the Defense Nuclear Facilities Safety Board in Washington D.C. to present the quarterly briefing of regulatory activities in support of the BNFL TWRS-P Waste Treatment Plant (WTP). Topics presented included:

- Oversight of BNFL design review and integrated safety management activities
- Inspections performed and associated findings
- Review guidance developed for TWRS-P WTP submittals
- The amendment to the tank farms FSAR (Office of River Protection) for waste retrieval and waste feed delivery
- The Senior Expert Review of the RU activities
- Implementation of industrial health and safety responsibilities
- TWRS-P WTP regulatory documents issued
- Developments in the revision of the memorandum of understanding between the DOE and NRC.

No actions resulted from the briefing.

At the request of the Carlsbad Area Office (CAO) Manager, Mrs. Inez Triay, Messrs. Ronald Light and Robert Barr of the RU presented the TWRS-P Regulatory Program concept to the CAO. This presentation was requested due to the M&O and Technical Assistance contracts coming up for bid in FY 2000. The RU has offered to assist the CAO in their deliberations regarding the desirability and practicality of implementing a Regulatory Unit concept.

Fiscal-year-to date milestone performance (EA, DOE-HQ, Field Office, and RL) shows that one milestone (50 percent) was completed on or ahead of schedule and one (50 percent) is overdue. The Milestone Achievement details, found following cost and schedule variance analysis, provide further information on all milestone types, both fiscal year-to-date and remaining scheduled. Additional details on the overdue milestones can be found in the milestone exception report starting on page J: 9.

COST PERFORMANCE (\$M):

	BCWP	ACWP	VARIANCE
TWRS Regulatory Unit	\$0.7	\$0.1	\$0.7*

*Rounding

The unfavorable cost variance is due primarily to errors in DISCAS actual cost download. True variance is a favorable \$178K due to a FY 1999 year end accrual adjustment as well as less than anticipated costs associated with CAR Preparation activities, Internal Policy Development and Design Reviews.

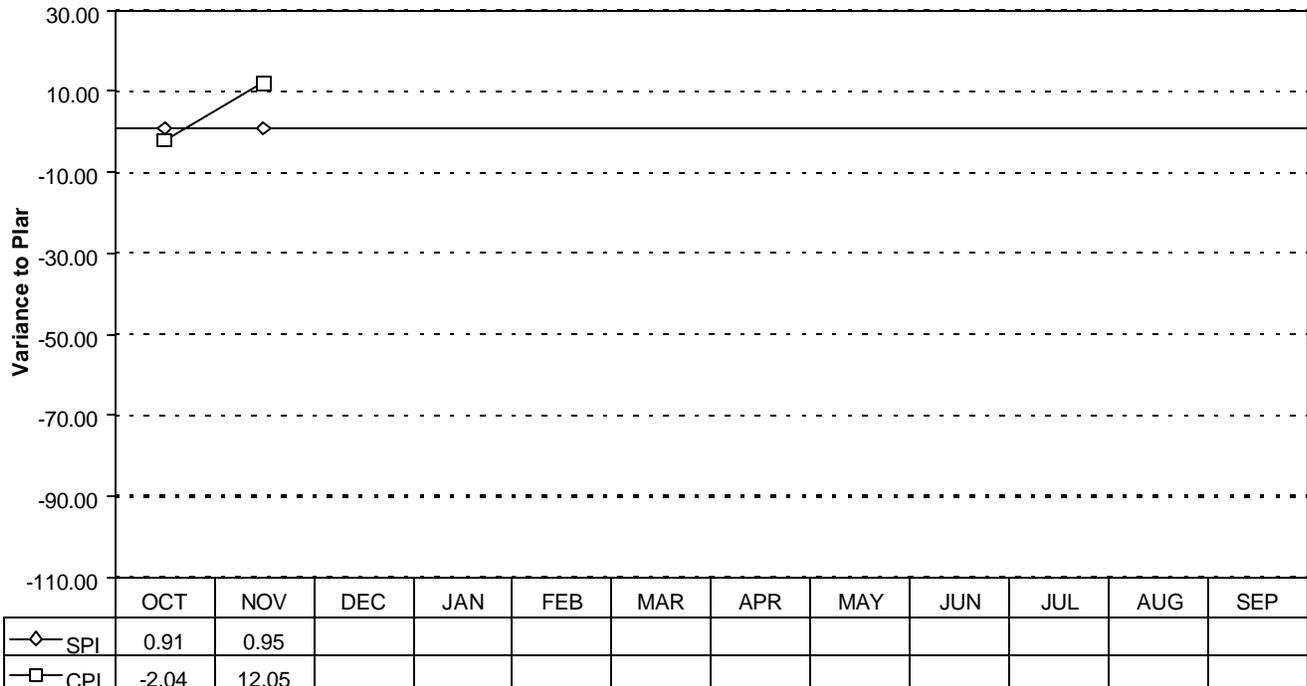
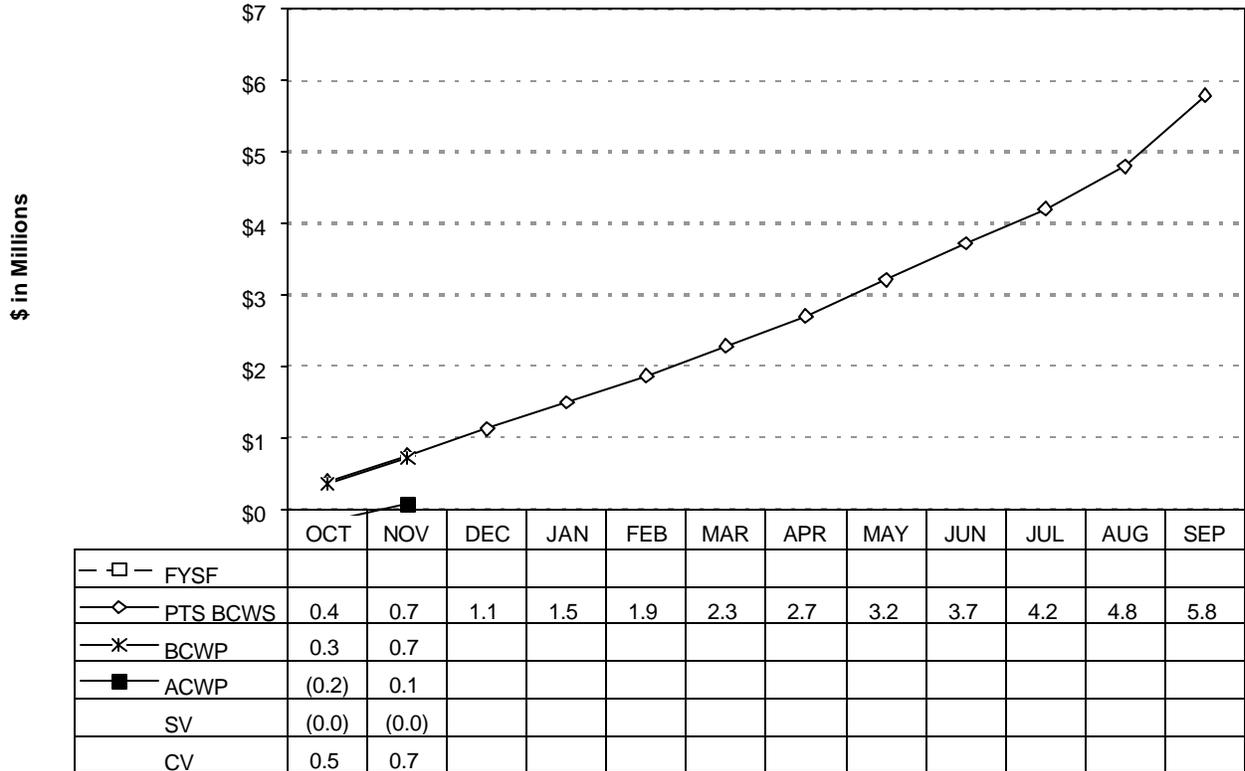
SCHEDULE PERFORMANCE (\$M):

	BCWP	BCWS	VARIANCE
TWRS Regulatory Unit	\$0.7	\$0.7	\$ 0.0

There is no schedule variance.

TWRS REGULATORY UNIT WBS 1.10

FY 1999 COST/SCHEDULE PERFORMANCE - ALL FUND TYPES Cumulative to Date Status



TWRS REGULATORY UNIT
WBS 1.10

		FYTD					AUTH	PTS
		BCWS	BCWP	ACWP	SV	CV	BSLN	BCWS
PBS								
RG01	Expense	0.7	0.7	0.1	(0.0)	0.7	4.3	5.8
	CENRTC	0.0	0.0	0.0	0.0	0.0	0.0	0.0
	GPP/LI	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Total		0.7	0.7	0.1	(0.0)	0.7	4.3	5.8

\$ IN MILLIONS

COST VARIANCE ANALYSIS: (+\$0.7M)

WBS/PBS

Title

1.10.1.1/RG01

TWRS Regulatory Unit

Description and Cause: The cost variance is due primarily to errors in DISCAS actual cost download. True variance is a favorable \$178K due to a FY 1999 year end accrual adjustment as well as less than anticipated costs associated with CAR Preparation activities, Internal Policy Development and Design Reviews.

Impact: None.

Corrective Action: Favorable cost variance will be reprogrammed to initiate new emergent priority workscope within the RU.

SCHEDULE VARIANCE ANALYSIS: (\$0.0M)

WBS/PBS

Title

1.10.1.1/RG01

TWRS Regulatory Unit

Description and Cause: There is no schedule variance.

Impact: None.

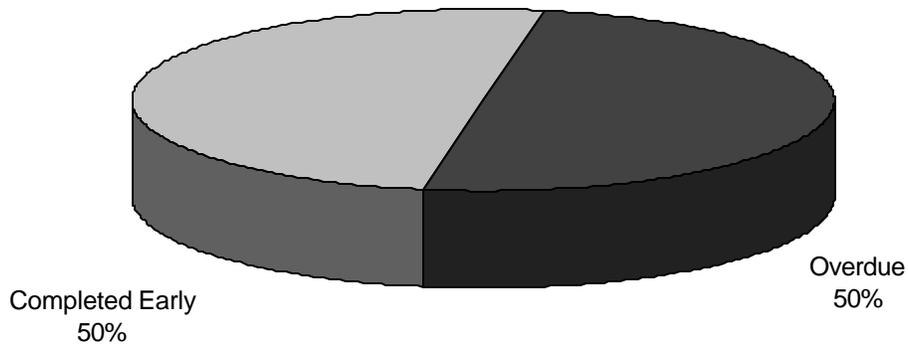
Corrective Action: None.

TWRS REGULATORY UNIT – WBS 1.10

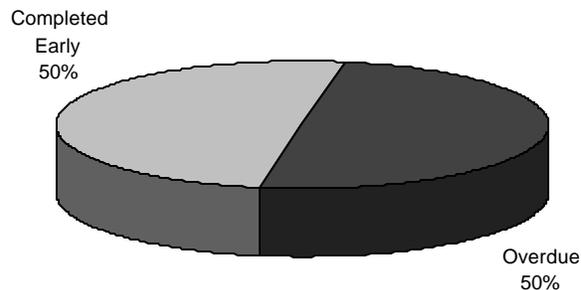
MILESTONE ACHIEVEMENT

MILESTONE TYPE	FISCAL YEAR-TO-DATE				REMAINING SCHEDULED			TOTAL FY 2000
	Completed Early	Completed On Schedule	Completed Late	Overdue	Forecast Early	Forecast On Schedule	Forecast Late	
Enforceable Agreement	0	0	0	0	0	0	0	0
DOE-HQ	0	0	0	0	0	0	0	0
FO	0	0	0	0	0	6	0	6
RI	1	0	0	1	0	11	0	13
Total Project	1	0	0	1	0	17	0	19

Total Project



RL



MILESTONE EXCEPTION REPORT

<u>Number/WBS</u>	<u>Level</u>	<u>Milestone Title</u>	<u>Baseline Date</u>	<u>Forecast Date</u>
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OVERDUE - 1

LLP-00-011	RL	Authorization Basis Inspection Report Issued	11/08/99	12/09/99
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Cause: The issuance of the Authorization Basis Inspection Report was delayed due to inconsistencies in records associated with BNFL's Radiation Protection Program.

Impact: Authorization Basis Inspection Report will be issued approximately one month late with no impact to the RU's critical path.

Corrective Action: The RU conducted a follow-up inspection in late November and the results from this follow-up inspection will be incorporated into the final report to be issued 12/9/99.

FY 1999 OVERDUE - 1

LLP-99-009	FO	Issue Revised MOA	02/26/99	Proposed Deletion
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Cause: DOE-HQ did not take action on the MOA revision.

Impact: None.

Corrective Action: This version of the MOA has been superseded prior to HQ approval. Consequently, the milestone will be deleted.