



U.S. Department of Energy
Office of River Protection

P.O. Box 450
Richland, Washington 99352

02-OSR-0034

Mr. Ron F. Naventi, Project Manager
Bechtel National, Inc.
3000 George Washington Way
Richland, Washington 99352

Dear Mr. Naventi:

CONTRACT NO. DE-AC27-01RV14136 - APPROVAL OF BECHTEL NATIONAL, INC. (BNI) AUTHORIZATION BASIS CHANGE NOTICE, ABCN-24590-01-00004, REV. 2., "IDENTIFICATION OF SAFETY ANALYSIS REPORT (SAR) FORMAT AND CONTENT"

- References:
1. BNI letter from A. R. Veirup to M. K. Barrett, ORP, "Transmittal for Approval – Authorization Basis Change Notice ABCN-24590-01-00004, Revision 2, Identification of Safety Analysis Report Format and Content," CCN: 026383, dated January 3, 2002.
 2. ORP letter from R. C. Barr to R. F. Naventi, BNI, "Contract No. DE-AC-01RV14136 – Partial Approval of Bechtel National, Inc. (BNI), 01-OSR-0483, dated December 5, 2001.
 3. BNI letter from A. R. Veirup to M. K. Barrett, ORP, "Transmittal for Approval – Authorization Basis Change Notice ABCN-24590-01-00004, Revision 1, Identification of Safety Analysis Report Format and Content," CCN: 023770, dated November 2, 2001.

The U.S. Department of Energy, Office of River Protection, Office of Safety Regulation (OSR) approves the referenced Authorization Basis Change Notice (ABCN), ABCN-24590-01-00004, Rev. 2, to the Safety Requirements Document (SRD) and Integrated Safety Management Plan (ISMP) for the River Protection Project-Waste Treatment Plant (RPP-WTP) provided the typographical and minor editorial changes shown on the enclosure to this letter are made. Approval is based on the Bechtel National, Inc. (BNI) submittal of January 3, 2002 (Reference 1) which incorporated most of the comments provided by the OSR to BNI in Reference 2, with the exception of the changes identified in the enclosure. The changes in the enclosure have been discussed with BNI staff.

As part of the ABCN implementing process, please submit within 14 days of receipt of this letter the revised pages of the SRD and ISMP and the revision page for each document identifying all revisions to date. Revision of the ABCN and ABCN supporting information to address the discrepancies noted in the attachment to this letter should be included. The approved changes are effective immediately and shall be fully implemented within 30 days, i.e., the provisions of the change may be used immediately; within 30 days, controlled copies of the SRD and ISMP and subordinate documents must be modified to reflect the associated change.

Mr. Ron F. Naventi
02-OSR-0034

If you have any questions concerning this approval, please contact Lewis F. Miller, OSR on (509) 376-6817. Nothing in this letter should be construed as changing the Contract, DE-AC27-RV14136. If, in my capacity as the Safety Regulation Official, I provide any direction that your company believes exceeds my authority or constitutes a change to the Contract, you will immediately notify the Contracting Officer and request clarification prior to complying with the direction.

Sincerely,

Robert C. Barr
Safety Regulation Official
Office of Safety Regulation

OSR:LFM

Enclosure

**COMMENTS ON ABCN-24590-01-00004, REVISION 2
IDENTIFICATION OF SAFETY ANALYSIS REPORT FORMAT AND CONTENT**

Final approval of ABCN-24590-01-00004 is based on the following changes being made to Revision 2 of the BNI submittal. These changes must be included in the revised pages of the SRD and ISMP.

1. ABCN-24590-01-00004, page 2 of 9, Item 6
 - BNI's proposed change is: "For ISMP Section 4.2.3.1: Replace reference to NRC Reg. Guide 3.52, *Standard Format and Content for the Health and Safety Section of License Applications for Fuel Cycle Facilities* with reference to SRD Volume II, Section 9.1 for the content of the SARs. This is incorrect. The OSR had approved using SRD Volume II, Section 9.1 for the format of the SARs, not for the content. NRC Reg. Guide 3.52 is still used for the content of the SAR. This must be corrected in the ABCN. (Page 3 of 9, Item 1 noted correctly that DOE-STD-3009-94, tailored, is acceptable as the new implementing standard for the RPP-WTP project for format only.)
2. ABCN-24590-01-00004, page 5 of 9, Item 1
 - The first statement, "The following detailed evaluation of the proposed ad hoc implementing standard to applicable laws and regulations, conformance to top-level safety standards, and the provision for adequate safety" is not a complete sentence. The sentence should be changed to read, "The following is a detailed evaluation of the proposed ad hoc implementing standard to applicable laws and regulations, conformance to top-level safety standards, and the provision for adequate safety"
3. ABCN-24590-01-00004, page 6 of 9, last statement
 - The last statement, "Evaluation: With one clarification, the proposed ad hoc implementing standard includes the topics listed above are addressed" is not a complete sentence. The sentence should be changed to read, "With one clarification, the proposed ad hoc implementing standard includes the topics listed above."

4. ABCN-24590-01-00004, Attachment 1, Table *-3

- There are many differences between the WTP New Location titles in the Table (Attachment 1, pages 20-26) and the Table of Contents (Attachment 1, pages 27-31). BNI must correct all of the differences between the two. Examples of where differences exist include the following:

<u>Page</u>	<u>WTP New Location</u>	<u>Table of Contents Title</u>
*-16	13.3 – Human Factors Process	Scope of Human Factors Process
*-16	13.4 – Ident. Of Human machine Interfaces	Human Factors Program
*-18	8.3 – Haz. Matl. Protection Organization	Haz. Matl. Protection and Organization
*-19	9.3 – Rad. And Haz. Waste Processes	Rad. And Haz. Waste Mgmt. Program and Organization
*-19	9.4 – Rad. And Haz. Waste Streams and sources	Rad. And Haz. Waste Processes
*-20	9.5 – (ERPP)	This is now section 9.7
*-20	9.5 – Environmental Radiological Protection Program	Two different names used: ERPP should be Environmental Radiological Protection Program