



U.S. Department of Energy
Office of River Protection

P.O. Box 450
Richland, Washington 99352

02-OSR-0136

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

Dear Mr. Naventi:

CONTRACT NO. DE-AC27-01RV14136 – OFFICE OF SAFETY REGULATION PARTIAL APPROVAL OF BECHTEL NATIONAL, INC (BNI) AUTHORIZATION BASIS CHANGE NOTICE, 24590-01-00008, REVISION 1, “ISMP STANDARDS APPROVAL PACKAGE SUBMITTAL”

Reference: BNI letter from A. R. Veirup to M. K. Barrett, ORP, “Transmitted for Approval: Revision 1 to Contract Deliverable, Revised Standards Approval Package Associated with Authorization Basis Change Notice ABCN-24590-01-00008, Revision 1, ISMP Standards Approval Package Submittal,” CCN 027628, dated February 5, 2002.

On the basis of the attached Safety Evaluation Report (SER), the U.S. Department of Energy, Office of River Protection, Office of Safety Regulation (OSR) approves the early approval request items in the referenced Authorization Basis Change Notice, (ABCN), 24590-01-00008, Revision 1, to the Integrated Safety Management Plan (ISMP) for the River Protection Project-Waste Treatment Plant (RPP-WTP). The approval is in response to your ABCN submittal referenced above.

Early approval request items in ABCN-24590-00008, Revision 1, revised several sections of the ISMP. The revisions include: (1) removal of reference in Section 3.16.1.1 to the “Executive Committee” and instead provide for safety oversight and feedback to the Project Manager from general corporate oversight; (2) change of wording in Section 3.16.5 to specify that performance monitoring in this section of the ISMP refers to radiological programs and to specify when such performance monitoring is to start for the conduct of operations and housekeeping activities; (3) changing “unusual incidents” to “unusual occurrences” in Section 3.16.6, (4) changes to Section 3.16.7, “Lessons Learned,” (5) changes to Table 8-1 Safety Management Records (Sheet 3) to remove the item on Occupational Safety and Health and modify the item “Environmental Protection” to “Environmental Radiological Protection,” (6) changes to Chapter 9, Tables 9-1 through 9-5 to make them consistent with the current approach for limited construction authorization request, partial construction authorization request, and phased construction authorization requests; (7) change to Section 11.1 to include in Project Manager responsibilities an additional item, “Acting on recommendations from Corporate safety oversight.”

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As part of the amendment implementation process, please submit within 14 days of receipt of this letter the revised pages of the ISMP and the revision pages identifying all revisions to date. This amendment is effective immediately and shall be fully implemented within 30 days, i.e., the provisions of the amendment may be used immediately; within 30 days, controlled copies of the SRD and subordinate documents must be modified to reflect the changes associated with this amendment.

If you have any questions please contact Dr. Narinder Kaushal, OSR, (509) 373-9443. Nothing in this letter should be construed as changing the Contract, DE-AC27-01RV14136. 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:NNK

Attachment

**Safety Evaluation Report (SER)
of Early Approval Request Items
in the Proposed Authorization Basis Change Notice
ABCN-24590-01-00008, Revision 1,
to the Integrated Safety Management Plan
for the River Protection Project-Waste Treatment Plant
by the Office of Safety Regulation**

1.0 INTRODUCTION

The River Protection Project Waste Treatment Plant (RPP-WTP) authorization basis is the composite of information provided by a Contractor in response to radiological, nuclear, and process safety requirements that is the basis on which the Office of River Protection (ORP) Manager grants permission to perform regulated activities. The authorization basis includes that information requested by the Contractor for inclusion in the authorization basis and subsequently accepted by the Manager, ORP. The authorization basis for the RPP-WTP includes the Safety Requirements Document (SRD) and the Integrated Safety Management Plan (ISMP). The SRD contains the approved set of radiological, nuclear and process safety standards and requirements, which if implemented, provide adequate protection of workers, the public, and the environment against the hazards associated with the operation of the facility. The ISMP defines a set of integrated activities that is directed toward the management or control of radiological, nuclear, and process hazards such that adequate protection is provided to workers, the public, and the environment.

This Safety Evaluation Report (SER) documents Office of Safety Regulation's (OSR's) safety evaluation of the Contractor-proposed changes to the ISMP included in the "early approval request" items in ABCN-24590-00008, Revision 1.¹

2.0 BACKGROUND

By a letter dated September 17, 2001,² Bechtel National, Inc., (Contractor) transmitted for OSR approval, revised Standards Approval Package and associated Authorization Basis Change Notice ABCN-24590-01-00008, Revision 0, as part of the Construction Authorization Request (CAR) submittal package. OSR's overall review of the revised ISMP will be conducted as part of the CAR Review. This overall CAR review is scheduled to be completed in October 2002. However, in the letter transmitting the ABCN, the Contractor requested early approval of 9 items identified in Attachment 2 of the ABCN. The OSR transmitted to the Contractor a set of

¹ BNI letter from A. R. Veirup to M. K. Barrett, ORP, "Transmitted for Approval: Revision 1 to Contract Deliverable, Revised Standards Approval Package Associated with Authorization Basis Change Notice ABCN-24590-01-00008, Revision 1 "ISMP Standards Approval Package Submittal," CCN 027628, dated February 05, 2002.

² BNI letter from A. R. Veirup to M. K. Barrett, ORP, "Transmitted for Approval: Contract Deliverable, Revised Standards Approval Package, and Associated Authorization Basis Change Notice ABCN-24590-01-00008, Revision 0, ISMP Standards Approval Package Submittal," CCN 023021, dated September 17, 2001.

questions resulting from OSR's initial review of the revised ISMP submittal.³ The Contractor's response to those questions identified a need for significant revision of the ABCN by the Contractor.⁴ By a letter dated February 5, 2002, the Contractor transmitted Revision 1 to ABCN that among other changes retracted two items from the early approval items in attachment 2 of the ABCN-24590-00008, Revision 0.

Early Approval request items in ABCN-24590-00008, Revision 1 propose changes to several sections of the ISMP. The proposed revisions include: (1) removal of reference in Section 3.16.1.1 to the "Executive Committee" and instead provide for safety oversight and feedback to the Project Manager from general corporate oversight; (2) change of wording in Section 3.16.5 to specify that performance monitoring in this section of the ISMP refers to radiological programs and to specify when such performance monitoring is to start for the conduct of operations and housekeeping activities; (3) changing "unusual incidents" to "unusual occurrences" in Section 3.16.6, (4) changes to Section 3.16.7, "Lessons Learned," (5) changes to Table 8-1 Safety Management Records (Sheet 3) to remove the item on Occupational Safety and Health and modify the item "Environmental Protection" to "Environmental Radiological Protection," (6) changes to Chapter 9 and related Tables 9-1 through 9-5 to make them consistent with the current approach for limited construction authorization request, partial construction authorization request, and phased construction authorization requests; (7) change to Section 11.1 to include in Project Manager responsibilities an additional item "Acting on recommendations from Corporate safety oversight."

3.0 EVALUATION

Proposed changes to ISMP Sections 3.16.1 and 3.16.1.1: References to the "Executive Committee" have been replaced with the words "Corporate Safety Oversight," "corporate organization," and "Corporate management."

Evaluation (acceptable): The proposed removal of reference to an "Executive Committee" is acceptable because the commitment for continued conduct of internal safety oversight is retained. On-going Corporate safety reviews, management assessments, and readiness determinations, as well as Corporate management sponsored external assessments, will continue to provide Project-level and topical oversight of the Project per corporate procedures and guidelines.

Proposed changes to ISMP Sections 3.16.5, "Performance Monitoring," and 3.16.6, "Performance Indicators": Changes to clarify that the scope of performance monitoring described is related to radiological, nuclear, and process safety, that operations-related performance monitoring will not occur until operations, and that monitoring will be performed

³ OSR letter from R. C. Barr to R. F. Naventi, BNI, "Office of Safety Regulation (OSR) Questions on the Revised Integrated Safety Management Plan," 01-OSR-0408, dated October 19, 2001.

⁴ BNI letter from A. R. Veirup to M. K. Barrett, ORP, "Transmitted for Use: Response to Office of Safety Regulation (OSR) Questions on Proposed Revision to the Integrated Safety Management Plan; ABCN-24590-01-00008," CCN 025088, dated November 16, 2001.

by responsible managers, rather than a "multidisciplinary team." Additionally, the term "unusual incidents" has been changed to "unusual occurrences" in Section 3.16.6.

Evaluation (acceptable): The revision is acceptable because any performance monitoring scope removed from the ISMP by this change is still required by the Contract. Notably, this includes the requirements of DOE M 231.1-1, "Environment, Safety and Health Reporting Manual," which are imposed by contract DE-AC27-01RV14136. Removal of reference to a multidisciplinary team is acceptable because the ISMP still includes performance monitoring by relevant functional groups. Formation of a single multidisciplinary team is not required to accomplish the performance monitoring function. Changing the term "unusual incidents" to "unusual occurrences" in Section 3.16.6 makes the terminology consistent with other authorization basis documents and does not reduce commitments.

Proposed changes to ISMP Section 3.16.7: Text has been added to describe the Project-wide Lessons Learned program, including the Engineering Lessons Learned System.

Evaluation (acceptable): The update to describe the Project-wide Lessons Learned program and the Engineering Lessons Learned System is acceptable. This update provides additional elaborative information on the function and application of a Lessons Learned program as currently applied on the WTP Project. These changes do not reduce previous commitments.

Proposed changes to ISMP Table 8-1, "Safety Management Records": Changes to remove occupational safety and to clarify that environmental reporting is related to radiation protection and radiological environmental activities.

Evaluation (acceptable): The revision is acceptable because the records requirements for occupational safety and health are contractually defined in Section J, Attachment E of contract DE-AC27-01RV14136. In addition to the reporting requirements of DOE M 231.1-1, "Environment, Safety and Health Reporting Manual," the Contractor is contractually required to meet the requirements of 29 CFR 1910, "Occupational Safety and Health Standards," and 29 CFR 1926, "Safety and Health Regulations for Construction," which cover areas, such as Material Safety Data Sheets, removed from ISMP Table 8-1. The remaining changes clarify meaning. There is no reduction in commitment.

Proposed changes to ISMP Section 9.0, "Scheduling of Activities Related to Safety," and related tables 9-1 through 9-5: This section was extensively rewritten. Essential changes include modification to reflect the current project approach of phased construction authorization, deleting out-of-date project schedules, and defining key activities related to safety against the current project organization.

Evaluation (acceptable): The reviewers examined the acceptability of the Contractor's proposed changes related to scheduling activities related to safety and scheduling regulatory submittals. The reviewers found that the Contractor committed to detailed project schedules to describe the sequence of events and logics between events related to safety. The reviewers determined that the revised sequence of regulatory deliverables was consistent with current project plans. On this basis, the reviewers determined that the text changes in Chapter 9 and related Tables 9-1

through 9-5, and the deletion of the outdated schedule from the ISMP (Figure 9-1) were acceptable. The reviewers concurred that deletion of reference to the Initial Safety Assessment (Section 9.2) did not change the Contractor's commitments and was therefore acceptable.

The reviewers analyzed the changes to Tables 9-1 through 9-5. The reviewers found that the revised text properly defined the essential activities related to safety at the design, construction, commissioning, operations, and deactivation phases of the project. The reviewers found that the functional assignment of responsibilities for each activity was consistent with the current contractor organization. The reviewers determined that the changes did not decrease the level of commitment. Based on these factors, the reviewers found the changes were acceptable.

The reviewers examined the text additions associated with partial construction authorization requests (PCARs - Section 9.4) and the scope of safety documentation related to construction (Section 9.5). The reviewers found that these additions committed to address existing CAR review guidance, to maintain consistency between PCARs and the Preliminary Safety Analysis Request, and to submit safety documentation in compliance with the contract. As these changes were consistent with the contract and represent further documentation of existing commitments, the reviewers determined that they were acceptable.

Proposed changes to ISMP Section 11.1: The responsibility of the Project Manager to serve as a member of the Executive Committee has been replaced with the responsibility to act on feedback from corporate safety oversight.

Evaluation (acceptable): The deletion of reference to the "Executive Committee" and addition of new text to state the Project Manager acts on feedback from corporate safety oversight is acceptable because it is necessary to conform and be consistent with the changes to ISMP Sections 3.16.1 and 3.16.1.1 regarding replacement of references to the "Executive Committee" with references to "corporate safety oversight."

4.0 CONCLUSION

On the basis of considerations described above, the OSR has concluded that there is reasonable assurance that the health and safety of the public and the workers will not be adversely affected by the proposed amendments, and that they comply with the applicable laws, regulations, and RPP-WTP contractual requirements. Accordingly, the OSR approves the amendments to the SRD as proposed in the early approval request items in ABCN-24590-00008, Revision 1.