



U.S. Department of Energy
Office of River Protection

P.O. Box 450
Richland, Washington 99352

02-OSR-0434

Mr. R. 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-WTP-ABCN-ESH-02-002, REVISION 0, "PROPOSED REVISION TO ISMP CHAPTER 11.0, 'ORGANIZATION ROLES, RESPONSIBILITIES, AND AUTHORITIES'"

Reference: BNI letter from A. R. Veirup to M. K. Barrett, ORP, "Transmittal for Approval: Authorization Basis Change Notice 24590-WTP-ABCN-ESH-02-002, Revision 0, Proposed Revision to ISMP Chapter 11.0, 'Organization Roles, Responsibilities, and Authorities'," CCN: 036702, dated August 6, 2002.

The U.S. Department of Energy, Office of River Protection reviewed the subject ABCN submitted in Reference 1. The proposed changes remove redundancies between Chapter 11 of the Integrated Safety Management Plan (ISMP) and sections of the Quality Assurance Manual that describe quality- and safety-related roles, responsibilities, and authorities.

Based on the attached Safety Evaluation Report, the changes are acceptable. There is reasonable assurance that the health and safety of the public and the workers, and the environment will not be adversely affected by the changes, and they comply with applicable laws, regulations, and River Protection Project Waste Treatment Plant contractual requirements.

As part of the amendment implementation process, please submit within 14 days of receipt of this letter the revised pages of the ISMP, 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, and controlled copies of the ISMP must be modified to reflect the changes associated with this amendment.

If you have any questions, please contact me, or your staff may call W. J. Pasciak, Office of Safety Regulation, (509) 373-9189.

Sincerely

Roy J. Schepens
Manager

OSR:ARH

Attachment

**Safety Evaluation Report (SER)
of Proposed Authorization Basis Change Notice (ABCN)
24590-WTP-ABCN-ESH-02-002, Revision 0
for the River Protection Project-Waste Treatment Plant (RPP-WTP)**

1.0 INTRODUCTION

The RPP-WTP authorization basis is the composite of information, provided by Bechtel National, Inc. (the 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 information requested by the Contractor for inclusion in the authorization basis and subsequently accepted by ORP. The authorization basis for the RPP-WTP includes the Quality Assurance Manual (QAM) and the Integrated Safety Management Plan (ISMP). The QAM contains the Contractor's program for meeting the requirements of 10 CFR 830, Subpart A, "Quality Assurance Requirements." The ISMP contains the safety management practices developed specifically for the project in the areas of design, construction, commissioning, and operation. By letter dated August 6, 2002,¹ the Contractor submitted proposed amendments to the Safety Requirements Document (SRD). This SER documents the evaluation of the changes proposed by the Contractor.

2.0 BACKGROUND

The Contractor proposed changes to the ISMP in its August 6, 2002, letter. The proposed changes remove redundancies between Chapter 11 of the ISMP and sections of the QAM that also describe quality- and safety-related roles, responsibilities, and authorities.

The following section documents the evaluation of the proposed changes:

3.0 EVALUATION

Description of Changes:

The following describe the proposed changes to the introduction and to each area of responsibility in Chapter 11 of the ISMP:

1. *Introduction.* The Contractor proposed to add text linking Chapter 11 of the ISMP and the QAM and to describe the intent of eliminating redundancy. The Contractor proposed to eliminate from the ISMP a figure that also appears in the QAM.

¹ BNI letter from A. R. Veirup to M. K. Barrett, ORP, "Transmittal for Approval: Authorization Basis Change Notice 24590-WTP-ABCN-ESH-02-002, Revision 0, "Proposed Revision to ISMP Chapter 11.0, 'Organization Roles, Responsibilities, and Authorities,'" CCN: 036702, dated August 6, 2002.

2. *Project Manager.* The Contractor proposed eliminating the responsibility to sign permit applications on the basis this is not a radiological, nuclear, or process safety responsibility. The Contractor proposed eliminating responsibilities redundant with those contained in the QAM. (The Reviewers noted Attachment 1 showed the deletion of the responsibility to serve as a member of the Executive Committee as a change under this ABCN. In fact, this change was previously approved. In addition, the proposed addition of the wording “AB safety-related” to the requirement of the Project Manager to set performance expectations did not appear in Appendix A. The reviewers confirmed this was an editorial error.)
3. *Deputy Project Manager.* The Contractor proposed to eliminate the description of the Deputy Project Manager’s responsibilities because they are also described in the QAM.
4. *Area Project Managers.* The Contractor proposed to eliminate the responsibilities of the Area Project Managers for managing the design and construction effort and for implementing the requirements of 10 CFR 820 because they are also described in the QAM.
5. *Engineering Manager.* The Contractor proposed to eliminate the responsibility of the Engineering Manager to incorporate regulatory and quality commitments into design procurement, fabrication, inspection, and testing because it is also described in the QAM.
6. *Construction Manager.* The Contractor proposed to eliminate the responsibility of the Construction Manager to incorporate regulatory and quality commitments of Systems, Structures, and Components into the construction because they are also described in the QAM.
7. *Quality Assurance Manager.* The Contractor proposed to eliminate the description of the Quality Assurance Manager’s responsibilities because they are also described in the QAM.
8. *Operations Manager.* The Contractor proposed to eliminate the responsibility of the Operations Manager to develop a program for operations procedures and to maintain qualified staff and ensure effective employee performance because they are also described in the QAM. The Contractor also proposed to remove reference to post deactivation activities as they are outside the scope of the Contractor’s contract.
9. *Process Technology Manager.* The Contractor proposed deleting all the current responsibilities of this management position because they were covered under the responsibilities of the higher level Engineering Manager. The Contractor proposed adding two new, position specific, safety roles.
10. *Procurement and Property Manager.* The Contractor proposed deleting the roles of this position on the basis they are bounded by the roles, responsibilities, and authorities of the Business Acquisition Manager.

11. *Acquisitions Services Manager.* The Contractor proposed adding a pointer to the responsibilities of the Acquisitions Services Manager defined in the QAM.

Evaluation: (Acceptable)

The proposed changes are acceptable because they do not reduce the level of commitment. The analysis supporting this conclusion is provided, for each change noted above, in the following discussion:

1. *Introduction.* The reviewers confirmed the added/modified text did not reduce the level of commitment. The reviewers confirmed the figure eliminated from the ISMP was identical to Figure 1, Policy Q-01.1, “Project Organization,” of the QAM. Therefore, the changes were acceptable.
2. *Project Manager.* The reviewers agreed signing permit applications is not a radiological, nuclear, or process safety requirement. The reviewers confirmed the eliminated ISMP responsibility for the Project Manager to “ensure implementation of the QA Program” was adequately addressed by the Project Manager responsibilities defined in Q-01.1, Section 3.1, “Project Manager.” Section 3.1 delegated implementation responsibility to the QA Manager, with the Project Manager retaining responsibility to both review the program and to ensure the QA Manager’s independence. The reviewers concurred the addition of the words “AB safety-related” to the requirement of the Project Manager to set performance expectations does not decrease commitment. Overall, the reviewers found the changes to the Project Manager’s responsibilities were acceptable.
3. *Deputy Project Manager.* The reviewers confirmed each of the Deputy Project Manager responsibilities described in the ISMP appeared, verbatim, in the QAM. Therefore, the deletion from the ISMP was acceptable.
4. *Area Project Managers.* The reviewers did not find the responsibility to manage the design and construction effort in the QAM. However, the reviewers determined this was not a radiological, nuclear, or process safety responsibility; therefore, the deletion was acceptable. The reviewers concurred that the QAM adequately addresses the requirements of 10 CFR 820, “Procedural Rules for DOE Nuclear Activities,” primarily in Policy Q-16.1, “Corrective Action,” and not in Policy Q-03.1 as noted by the Contractor.
5. *Engineering Manager.* The reviewers confirmed the QAM, Policy Q-01.1, Section 3.5, “Engineering Manager,” contains equivalent responsibilities to those deleted from the ISMP. The deletion was therefore acceptable.
6. *Construction Manager.* The reviewers confirmed the QAM, Policy Q-01.1, Section 3.6, “Construction Manager,” contains equivalent responsibilities to those deleted from the ISMP. The deletion was therefore acceptable.

7. *Quality Assurance Project Manager.* The reviewers confirmed each of the Quality Assurance Manager responsibilities described in the ISMP appeared in the QAM, together with additional responsibilities. Therefore, the deletion from the ISMP was acceptable.
8. *Operations Manager.* The reviewers concurred with removing the reference to post deactivation activities on the basis it is outside the Contractor's scope. The reviewers found the sections of the QAM referenced by the Contractor did not cover responsibility for the other deletions. However, the reviewers determined the general requirements were covered in Policy Q-02.2, "Personnel Training and Qualification" and Policy Q-05.1, "Instructions, Procedures, and Drawings." These sections of the QAM also clearly assign responsibilities. Therefore, the deletion from the ISMP was acceptable.
9. *Process Technology Manager.* The reviewers found the proposed new safety roles for the Process Technology Manager were appropriate. The reviewers evaluated the Contractor's position that the deleted responsibilities of the Process Technology Manager were contained in the Engineering Manager responsibilities. The reviewers found equivalency between the deleted roles and the roles of the Engineering and Operations managers, and other project documentation, as follows:
 - a. "Ensuring that technologies are developed and demonstrated" – the reviewers did not find an equivalent responsibility assigned to any manager, but concur that this is not a safety-related function and can therefore be deleted.
 - b. "Evaluating the completed process design and proposed changes to the design" – the reviewers determined this was adequately covered by item 3 of the Engineering Manager's responsibilities.
 - c. "Identifying commissioning tests to be performed and their acceptance criteria" – the reviewers determined this was adequately covered under the responsibilities of the Construction Manager.
 - d. "Incorporating regulatory and quality commitments into procurement, fabrication, inspection, and testing of process components" – the reviewers determined this was adequately covered under items 7 and 12 of the Engineering Manager's responsibilities.
 - e. "Performing systematic design reviews to determine readiness to authorize fabrication and construction of structures, systems, and components (SSC)" – the reviewers determined this was adequately covered under item 1 of the Engineering Manager's responsibilities and by Section 3.7, "Design Reviews," of QAM Policy Q-03.1, "Design Control."
 - f. "Implementing design considerations for deactivation and decommissioning" – the reviewers determined this was specifically covered by item 9 of the Engineering Manager's responsibilities.

Based on this analysis, the proposed deletions of Process Technology Manager responsibilities from the ISMP were acceptable.

10. *Procurement and Property Manager.* The reviewers found the deleted responsibilities are adequately covered under the responsibilities of the Business Services Manager and by the requirements of QAM policy Q-07.1, “control of Purchased Items and Services,” Section 3.2, “Procurement Planning,” and were therefore acceptable.
11. *Acquisitions Services Manager.* The reviewers confirmed the responsibilities of the Acquisitions Services Manager are defined in Section 3.8 of QAM Policy Q-01.1. Therefore, this addition was acceptable.

4.0 CONCLUSION

Based on evaluation of the proposed changes described above, the proposed changes are acceptable, and there is reasonable assurance that the health and safety of the public and the workers, and the environment will not be adversely affected by the proposed changes. Furthermore, the proposed changes comply with applicable laws, regulations, and RPP-WTP contractual requirements.