

02-OSR-0529



U.S. Department of Energy
Office of River Protection
Mr. R. J. Schepens
Manager
P.O. Box 450, MSIN H6-60
Richland, Washington 99352

CCN: 043667

OCT 18 2002

Dear Mr. Schepens:

CONTRACT NO. DE-AC27-01RV14136 – AUTHORIZATION BASIS CONSISTENCY

Per the U.S. Department of Energy's (DOE) response on October 16, 2002 to our verbal proposal regarding the upcoming Authorization Basis (AB) Management Inspection, we are requesting a postponement of that inspection for six weeks. A recent Management Assessment (Attachment 1) performed by the Project has identified a number of weaknesses in compliance with our AB Management program and we have written a Corrective Action Report (CAR) to address these weaknesses. The ramifications of this were discussed at length at the Project Safety Committee meeting on October 16, 2002 prior to the DOE acceptance of our proposal. The importance of immediate and effective compensatory measures was recognized by the management in attendance. We would like to have an opportunity for the corrective actions to be implemented before you initiate your inspection.

A review of a sample of Revision 0 (or later) Low Activity Waste and High Level Waste drawings revealed that most drawings in the sample were inconsistent in some respect with descriptive information in either the approved Partial Construction Authorization Request (PCAR) and/or the proposed Preliminary Safety Analysis Report (PSAR). The inconsistencies reflected finalization of design details and included differing room numbers, tank volume changes, relocated equipment, and changed system descriptions. No cases have been found which resulted in the need to modify the design as issued for compliance with PCAR or PSAR safety bases.

Immediate compensatory action was taken by Engineering Management to prevent additional design documentation being issued without review against all information in the PSARs, including descriptive information as well as design requirements to support safety functions. An instruction was issued to all Discipline Managers, which required the AB coordinators to perform and document an AB consistency review on all primary drawings prior to their issue as numeric revisions using the Safety Screen for Design Changes Checklist. These coordinators have experience and additional training in AB maintenance and have been assisting the design engineers in Authorization Basis Change Notice preparation. In addition, 100% of primary design drawings that have been issued to date, as Revision 0 or higher will be reviewed by teams consisting of cognizant Environmental, Safety, and Health (ES&H) Safety Analysts and Design

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Engineers. These reviews, to be initiated by October 21, 2002, will also be documented using the Safety Screen for Design Changes Checklist. The Safety Screening for Design Changes Guide provides a comprehensive review methodology.

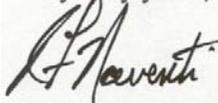
For the longer term, the ES&H Department is close to completion on an AB Maintenance training module which will be used to provide more advanced training in the AB Maintenance process for those who are most affected.

For all drawings found that were inconsistent with the AB, safety evaluations were and continue to be performed. Decisions to Deviate, which document and justify the AB inconsistency, are being prepared as appropriate. These will be followed up by AB Change Notices to update the AB documents. It is important to note that, to date, no cases have been found where the design had to be modified. Also, there were no cases where safety case requirements were not met or related safety analyses changed substantially.

The Project is firmly convinced that this issue does not impact the safety of the design issued for construction. Based on data to date, there is little risk of potential changes to the design issued for construction as a result of correcting the inconsistencies in the AB documents. Though a weakness has been discovered, it is being quickly assessed and fixed with appropriate short term and longer term corrective actions. In all instances design changes resulted in a design that was in conformance with applicable laws and regulations, top level standards and principles and Safety Requirements Document safety criteria. Also, as mentioned earlier, there have been no instances found where any design media had to be modified. Therefore, use of any of these drawings for procurement or construction result in a safe plant that is compliant with the design and safety basis.

If you have any questions, please contact Mr. Fred Marsh at (509) 371-3600.

Very truly yours,



R. F. Naventi
Project Manager

FB/slr

Attachment: Management Assessment