



U.S. Department of Energy
Office of River Protection

P.O. Box 450
Richland, Washington 99352

02-OSR-0548

Mr. R. F. Naventi, Project Manager
Bechtel National, Inc.
2435 Stevens Center
Richland, Washington 99352

Dear Mr. Naventi:

CONTRACT NO. DE-AC27-01RV14136 – DISAPPROVAL OF BECHTEL NATIONAL, INC. (BNI) REQUEST TO COMMENCE ADDITIONAL LIMITED PROCUREMENT

Reference: BNI letter from R. F. Naventi to R. J. Schepens, ORP, "Additional Request for U.S. Department of Energy Approval to Commence Limited Procurement," CCN 040377, dated October 16, 2002.

This letter disapproves the BNI request for authorization of additional limited procurement. In the Reference, BNI requested approval to procure materials and components for use in construction of the Pretreatment (PT), High Level Waste (HLW) vitrification, Low Activity Waste vitrification, and Analytical Laboratory facilities. These items include jumpers, steam ejectors, jet pump pairs, autosampling systems, condenser components, and various vessels. BNI committed to review procurement documents for consistency with the evolving authorization basis before issuing them for award.

The U.S. Department of Energy, Office of River Protection (ORP) review of the requested limited procurements identified discrepancies between the limited procurement and the Preliminary Safety Analysis Report (PSAR). Specifically, the cesium ion-exchange feed coolers were specified to be procured as quality level (QL) 2. ORP questioned BNI staff whether these coolers provided a primary containment function for HLW in the PT facility and should be safety design class and procured to QL-1 requirements consistent with the PSAR. BNI staff stated that based on Integrated Safety Management (ISM) Cycle III hazard analysis, these coolers should be procured to QL-1 requirements. BNI also informed ORP that during review of this question two additional vessels were identified in the reference letter as QL-2 when they should have been specified as QL-1.

The Reference also requested authorization of limited procurement for 5,300 QL-1 jumper connectors. During review of the PSAR, ORP questioned (Question PT-PSAR-103) when the unverified assumption regarding jumper seismic qualification would be closed. In response, BNI stated unverified assumptions would be closed as the design is finalized and if necessary additional ISM work would be performed. In discussions with BNI staff regarding

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the status of this assumption, it was stated that closure of this assumption has not been completed. It is not apparent whether safety functions of jumpers will be maintained in the limited procurement.

BNI is requested to review the limited procurement and resubmit the request to ORP after BNI confirms that the procurements are consistent with the PSAR. Unverified assumptions associated with structures, systems, and components for which authorization of limited procurement is requested must be addressed or a strategy defined for managing the associated risk. Based on discussions with BNI staff, it is ORP's understanding that responses to these requests are currently being prepared.

If you have any questions, please contact me, or your staff may call Lewis F. Miller, Jr., Safety Regulation Division, (509) 376-6817.

Sincerely,

OSR:RAG

Roy J. Schepens
Manager