



**U.S. Department of Energy**  
**Office of River Protection**

P.O. Box 450  
Richland, Washington 99352

02-OSR-0630

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

Dear Mr. Naventi:

CONTRACT NO. DE-AC27-01RV14136 – RESPONSE TO BECHTEL HANFORD, INC (BNI) REQUEST TO SUBMIT PARTIAL CONSTRUCTION AUTHORIZATION REQUEST (PCAR) FOR THE HANFORD TANK WASTE TREATMENT AND IMMOBILIZATION PLANT (WTP) ANALYTICAL LABORATORY

Reference: BNI letter from R. F. Naventi to R. J. Schepens, ORP, "Intent to Submit Partial Construction Authorization Request (PCAR) for the Hanford Tank Waste Treatment and Immobilization Plant Analytical Laboratory," CCN 043671, dated October 30, 2002.

This letter responds to BNI's request to submit a PCAR for the Analytical Laboratory. In the reference, BNI notified the U. S. Department of Energy, Office of River Protection (ORP) of its proposal to submit a PCAR for the WTP Analytical Laboratory on February 24, 2003. This PCAR would request authorization to place concrete for two below grade pits for the Analytical Laboratory on June 23, 2003.

The ORP held a meeting with BNI to discuss the request on December 10, 2002. At the meeting, BNI provided information on the contents and schedule of the proposed Analytical Laboratory PCAR. BNI stated that the PCAR would consist of a facility description, a hazards analysis for the complete facility, Design Basis Accidents (DBA) for the pits, and important-to-safety (ITS) systems, structures, and components (SSC) for the pits. However, associated structural calculations would be submitted as Revision A calculations, with Revision 0 calculations provided prior to the end of the review. A complete set of DBAs, ITS SSCs, and draft Technical Safety Requirements would not be submitted until the submittal of the full facility Construction Authorization Request (CAR) in May 2003.

Due to the experience gained with the Low Activity Waste, High Level Waste, and Pretreatment sequential construction authorization submittals, the ORP is concerned that the review of preliminary, incomplete information regarding the Analytical Laboratory will result in an inefficient review without commensurate benefit to the project. Past ORP reviews of the BNI Preliminary Safety Analysis Report (PSAR) and CAR submittals have been delayed by the process of first reviewing draft drawings and calculations, then re-reviewing incremental changes to these documents during the review as they are finalized. This has been both costly and labor intensive to ORP. Therefore, at the meeting, ORP proposed an alternate to submittal of a PCAR

Mr. R. F. Naventi  
02-OSR-0630

-2-

for the Analytical Laboratory, namely, to submit a CAR for the full facility with a request for early approval of the two pits and tunnels and the basemat for the facility. Under this arrangement, the CAR would be submitted when all of the accident analyses are complete and when the related preliminary design drawings and calculation supporting the hazard and accident analysis are complete (Revision 0), currently scheduled on May 2, 2003. The ORP would review and approve the two pits and the basemat at the earliest possible date.

Currently, ORP has allocated 16 weeks for review of the full-facility CAR with a small review team. If the BNI submittal and associated calculations are complete, a Safety Evaluation Report for the full facility could be issued by September 1, 2003, thereby supporting the current date desired by BNI for approval of the basemat (September 2003), and four months ahead of the desired date for approval of the full facility (January 2004). Therefore, ORP does not approve the proposal to segment the Analytical Laboratory Construction Authorization Submittal.

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

Sincerely,

OSR:CKL

Roy J. Schepens  
Manager