



U.S. Department of Energy
Office of River Protection

P.O. Box 450
Richland, Washington 99352

01-RU-0019

Ms. M. P. DeLozier, President
and General Manager
CH2M Hill Hanford Group, Inc.
Richland, Washington 99352

Dear Ms. DeLozier:

CONTRACT NO. DE-AC27-99RL14047 - REGULATORY UNIT (RU) DISAPPROVAL OF AUTHORIZATION BASIS AMENDMENT REQUEST (ABAR), ABAR-W375-00-00007, REV. 0, "IDENTIFICATION OF AN IMPLEMENTING STANDARD FOR MAINTENANCE"

This letter communicates the results of the RU review of BNFL Inc.'s letter CCN 013705, submitting ABAR-W375-00-00007, Rev. 0, subject above, dated June 6, 2000. The ABAR requested a change to Safety Requirements Document (SRD) Safety Criteria 7.6-1 through 7.6-4 to revise the implementing standards for conduct of maintenance from various sections of the Integrated Safety Management Plan (ISMP) to a standard derived from tailored International Atomic Energy Agency (IAEA) standard IAEA 50-SG-07, "Maintenance of Nuclear Power Plants." This change was proposed to resolve a condition (Condition 13) of RL/REG-98-20, *DOE Regulatory Unit Evaluation of BNFL Inc. Safety Requirements Document, Revision 1A*. Condition 13 required the River Protection Project-Waste Treatment Plant (RPP-WTP) Contractor, before authorization for construction, to provide adequate subordinate standards for operational testing and maintenance.

The RU reviewers concluded that the proposed standard was not consistent with SRD Safety Criteria 7.6-1 through 7.6-4. The SRD safety criteria outlined a thorough maintenance program. However, the proposed implementing standard, IAEA 50-SG-07, does not address all the referenced safety criteria in the SRD.

A detailed review of the proposed standard and associated ABAR is provided in the enclosed safety evaluation. The safety evaluation identifies specific areas of the proposed standard that do not address the SRD safety criteria. It appears that a minimum amount of additional tailoring of the proposed implementing standard could address the concerns identified in the enclosed safety evaluation.

M. P. DeLozier
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No written response to the safety evaluation is necessary. If you have any questions, please contact me or George Kalman, RU, on (509) 372-0652.

Sincerely,

REG:JWM

Jewel J. Short, II
Contracting Officer

Enclosure