



INTEROFFICE MEMORANDUM

DATE: November 25, 1996
TO: Mark Hickman, Bldg. 779 D&D Project Manager, T130F, X7145
FROM: A. B. Reed, PA, Bldg. T130B/9, X7160, Page 5814
SUBJECT: BUILDING 779 D&D AUTHORIZATION BASIS RECOMMENDATIONS
- ABR-079-96

- Ref.: 1. Authorization Basis Path Forward - VM-383-96, Vic Mani ltr to David Lowe, 96-RF-06241, November 8, 1996
2. RFCA, July 19, 1996
3. MOU,
4. DNFSB/TECH12,

I have reviewed the draft Decommissioning Operations Plan (DOP) for the 779 Complex and make the following recommendations for completing the authorization basis and related nuclear safety work associated with the RMRS Building 779 D&D work scope. This recommendation includes an attachment with an estimate of the time and resources needed to complete this recommended authorization basis work.

Immediate authorization basis improvement activities should be begun, these should be addressed at bringing the current Authorization Basis for Building 779 into agreement with its present mission and building inventory. These actions should include correction of known deficiencies in the OSRs and revising the OSRs to reflect the reduced hazards. A letter addressing this and requesting SSOC to begin the work has been prepared and was submitted for approval. This should allow for performance of remaining deactivation activities while the documentation for beginning the facility's D&D programs is approved.

Further efforts should be directed at incorporating the needed nuclear safety controls into the 779 Complex DOP. These steps should be simple and effective in improving the efficiency of the D&D operations of the facility and reducing the building mortgage and its D&D costs. These controls should be based on the EPA established limits for environmental dispersment of radionuclides to the maximum extent possible. An analysis should be performed to determine if the building radionuclide inventory is now low enough to meet the EPA limits, and if so the DOP limits should be entirely based on these EPA limits.

The Authorization Basis Path Forward, reference 1, notes that a Basis for Operation (BFO) is planned for Building 779 and that it is the pilot for the plutonium life cycle AB process. However, the Authorization Basis Path Forward, reference 1, also states that until the lessons learned form the Building 771 BFO process are evaluated and the Building 771 BFO is performance tested it would be wise not to start development of any additional BFOs.

The referenced letter also states that a fundamental change in the authorization basis decision making process is being implemented. Future authorization basis decisions will

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be made based on the facility mission, expected remaining work within the facility, ability to complete risk reduction work based on activity envelopes and on the difficulty or costs of working with the existing Authorization Basis. Until this long term BFO process can be tested and then implemented it is vital that that we immediately take alternate steps to simplify the 779 facility authorization basis and reduce the nuclear safety requirements in line with the current risk status of the facility.

With these criteria in mind RMRS should work to include the needed nuclear safety controls directly into the D&D documents. The goal of this effort is to continually reduce the nuclear safety controls for the building as the D&D preparation and actual work progresses. This effort should also directly address the Criticality Safety Engineering program reduction and termination.

If you have any questions please call me at X7160 or at DP 5814. Thank you for your time.

cc: file (2 copies)
C. C. Jierree
H. J. Zeile
L. A. Guinn
A. P. Power
P. R. Bengel
J. M. Bower

Decision Points

Building 779 D&D Authorization Basis						
Control Decision Points						
No.	Action	RFCA	DOE Nuclear Orders	10 CFR 820, 830.120, 835	EPA	Discontinue limit / date
Authorization Basis Controls						
1	Maintain SARs and OSRs	Required controls included in RFCA documents, esp DOP	Until Radiological control facility, PU239 450 gms.- 8.4 gms. if segmentation precludes criticality			
	HASP	Included in documentation	Required for all hazardous work			
	EPA Permits	Required controls included in RFCA documents				
Programatic Controls						
	Criticality safety program	Required controls included in RFCA documents, esp	Until Radiological control facility			

Decision Points

Building 779 D&D Authorization Basis			
Control Decision Points			
No.	Action	RFCA	Discontinue limit / date
	Maintain QA program	DOE Nuclear Orders	EPA 10 CFR 820, 830.120, 835
Immediate reduction in nuclear and non-nuclear safety modifications, maintenance work, and surveillance activities			
	Emergency diesel - replacement of underground storage tank (UST) and current maintenance activities. Evaluate current need for generator, use Bldg. 771 BIO analysis, and try to re-designate it as a Stack CAA monitoring - rad?	analysis based on source and dispersion scenario	
	Criticality Accident Alarm System		
Security Controls			
	Green badge		
	Yellow		
	Red		