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DRAFT

November 21, 1996 96-RM-TA-0222-SS

Roger F Bacon, President
Safe Sites Of Colorado
Building 750
Rocky Flats Environmental Technology Site

Subject BUILDING 779 AUTHORIZATION BASIS MODIFICATIONS REQUESTED IN PREPARATION FOR BUILDING TURNOVER TO RMRS - JLM-210-96

Requested Action Revise SSOC Authorization Basis work priorities to accelerate these needed changes to Building 779 Authorization Basis

RMRS has been reviewing the status of Building 779 Authorization Basis documents as part of our preparations to assume control of the Building 779 complex for decommissioning activities at the end of this year In this review process, working with your Nuclear Safety Department, we have found several Authorization Basis documents for which needed modifications are being prepared but, for which the assigned priorities are so low that the work will not be done by the turnover date We have also found several Authorization Basis documents that need correction for no planned work was identified

I am requesting that for these specific activities which are planned the work priorities be advanced so that the needed reductions in FSAR and OSR control levels are in place for the RMRS assumption of building operational control If that is not possible in the time before turnover I would at least request that the modifications are prepared and submitted to Kaiser-Hill and DOE RFFO for approvals prior to the facility turnover to RMRS

These planned activities include the completion of the corrections identified on the list titled Risk Reduction Area Building 779 Operational Safety Requirements Errors I understand that those type E items have been completed I request that the type D items would be completed if at all possible Also, of the remaining type P items I request that those that would seriously affect our ability to maintain the building while completing any deactivation activities be completed As a minimum this would include those identified errors in OSR sections

Section 7 3 3 - which address the electrical power distribution system and the inability to verify normal and alternate power supplies With the present state of the facility I would like this action to include the removal of the requirements for the emergency power diesel generator

Section 7 3 2 - which addresses zone II fan operations

Sections 7 3 1, 7 3 1 3, 7 3 1 4, and 7 4 1 3 - which address zone I ventilation type concerns which may no longer be required with reduction of building inventory during the recent SSOC deactivation activities

ADMIN RECORD

Y21

In addition in reviewing the List of SARs, OSRs, TSRs, SERs, BIOs, BFOs, JCOs, and USQs for Nuclear Facilities published by your Nuclear Safety Department I noticed that several of the USQs applicable to building 779 have compensatory measures which I would also like to have closed out for the building This includes those USQs identified as #2, 3, and 4

If you have any questions concerning these requests please contact me or Candice Jierree of my staff at extension 2461

James L McAnally
President
Rocky Mountain Remediation Services, L L C

ABR rlm

cc
Truax
Arlan Schade
D G Satterwhite, SSOC
Mark Dana, KH
Jack Zimmer, KH

RISK REDUCTION AREA
BUILDING 779
OPERATIONAL SAFETY REQUIREMENTS ERRORS

OSR	REQUIREMENT	DEFICIENCY	ACTION	TYPE
7 1	Text Building 779 is a facility for activities in physical chemistry, physical metallurgy, machining and gaging technology, joining technology and process development These operations and the areas in which they are located are described in the Chapters 5 and 6 of this SAR	Building 779 no longer operates as a R&D facility	Replace "779 is a facility" with "779 was a facility" Add to the end of the paragraph "The current mission is deactivation "	a) E b) E
7 3	LCO Generally, tolerances on LCOs or corrective action durations are not discussed Systems important to safety which have LCOs includes Primary confinement systems Secondary confinements systems Emergency power systems Safety, monitoring and detection systems (SAAM alarm, criticality alarm, fire detection, fire suppression)	No longer LCO	Remove "(SAAM alarm,)"	E
7 3 1	Text Primary confinement is comprised of Zone I enclosures (e g , gloveboxes), Zone IA hoods, inert or glovebox dry air systems, atmospheres and ventilation system The physical form of the hazardous material being handled may be such (nondispersible) that a lesser degree of confinement is suitable The primary confinement function must be maintained when radioactive materials (including surface contamination) is present.	Glovebox system is no longer dry air system	a) Remove "inert or glovebox dry air systems" b) Remove "primary confinement function must be maintained when radioactive material "	a) P b) P (site)
7 3 1 3	Applicable Applies to the oxygen concentration limit within inerted gloveboxes	Building 779 will no longer process Pu	**STUDY:** Remove 7 3 1 3 Inert Atmosphere, entire section No processing of Pu allowed in Building 779	P

Dec 3rd

Zone 1

Zone 1

160(a) 75%

RISK REDUCTION AREA
BUILDING 779
OPERATIONAL SAFETY REQUIREMENTS ERRORS

OSR	REQUIREMENT	DEFICIENCY	ACTION	TYPE
7 3 1 3	Applicability Inert (nitrogen or argon) atmosphere required to process metallic Pu	Building 779 will no longer process Pu	**STUDY:** Remove 7 3 1 3 Inert Atmosphere, entire section No processing of Pu allowed in Building 779	P
7 3 1 4	Bases High efficiency particulate air (HEPA) filter efficiencies are verified as acceptable (99 97%) before installation and (99 95%) after installation	The efficiency of the HEPA filter only matters after installation	Remove "(99 97%) before installation and"	P (site)
7 3 1 4	Zone I dry air system normally operates with one exhaust fan running and with a standby fan All exhaust fans shall be on emergency power Depending on the extent of an emergency condition, standby fans shall be activated	Glovebox system no longer dry air Not an LCO	a) Remove "dry air" b) Remove "Depending on the extent of an emergency condition, standby fans shall be activated "	a) P b) E
7 3 2	Bases HEPA filter efficiencies are verified as acceptable (99 97%) before installation and (99 95%) after installation Accident analyses take credit for one stage of HEPA filtration One air-cleaning stage should operate with an efficiency equal to or greater than 99 9% Untested stages are considered prefilters The first stage of all Zone II HEPA filters shall be installed to ensure the functionality of the manual deluge system design feature	The efficiency of the HEPA filter only matters after installation	Remove "(99 97%) before installation and"	P (site)
7 3 2	Bases To maintain the desired negative pressure between Zone II and Zone I and III, the Zone II system is operated at approximately -0 3 in w g relative to the outdoor atmosphere	Remove "approximately" statements	Remove "To maintain the desired negative pressure between Zone II and Zone I and III, the Zone II system is operated at approximately -0 3 in w g relative to the outdoor atmosphere "	E

OSR	REQUIREMENT	DEFICIENCY	ACTION	TYPE
7 3 2	LCO The Zone II system normally operated with two exhaust fans and one recirculation fan Under an emergency condition, one exhaust fans is required and at least one exhaust fans shall be on emergency power The recirculation fan shall be shut down or its flow modified, depending on the emergency, e g , a major fire An alarm shall be generated on loss of flow through either of the two exhaust fans An interlock shall shut down the supply fan when an exhaust fan shuts down	Building 779 has three ventilation systems, 779-1, 779-2 and 779-3 The recirculation fans are not always shut down depending on the emergency	a) Remove "The Zone II system normally operates with two exhaust fans and one recirculation fan " b) Add "for 779-1, 779-2 and 779-3 HVAC systems " after "emergency power" c) Remove "The recirculation fan shall be shut down or its flow modified, depending on the emergency, e g , a major fire	a) P b) P c) E
7 3 3	Bases In the event of normal and alternate electrical power (offsite sources) loss, all load are dropped offline and the emergency power diesel generator starts Automatic switchgear transfers connection from the disabled feeders to the emergency generator buses Sequencing devices connect vital loads to the generator buses in a planned sequence to avoid overload due to power surge	Cannot verify "normal and alternate"	Remove "normal and alternate" and replace with "offsite"	P
7 3 4 1	7 3 4 1 Selective Alpha Air Monitors		Change to "- SECTION DELETED"	E
7 3 4 3	Bases Automatic fire detection devices are provided in certain area (e g , gloveboxes, vaults and filter plenums) where early fire detection is essential in order to conform with fire code requirements of the National Fire Protection Association (NFPA) and the Department of Energy (DOE) The fire detector ratings shall be determined by the Fire Protection Engineer	Editorial statement	Clarify wording	E

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RISK REDUCTION AREA
BUILDING 779
OPERATIONAL SAFETY REQUIREMENTS ERRORS

OSR	REQUIREMENT	DEFICIENCY	ACTION	TYPE
7 3 4 3	Bases The plant fire alarm system includes local building alarms and also alarms to the Plant Protection Dispatch Center in Building 121 and the Fire Department in Building 331 Fire alarm wiring has a supervised circuitry system which alarms in the event of a short, ground, or break, and identifies its zone location in the system	Heat detector probe may not be supervised all the way for the last 6 or 7 inches and plenum detectors may not be supervised	**STUDY:** No action at this time operations will evaluate	P (site)
7 3 4 3	LCO This response may be to perform fire suppression if necessary, to evacuate nonessential personnel from the building and/or area, or to satisfy other requirements as announced over the building PA system Remedial activities such as adjusting ventilation system shall be performed as necessary	a) Editorial b) Editorial c)Fire Department shall give instructions to SOEs on ventilation modifications per Fire Department procedures	a) Change "this" to "Alarm" and move to bases "Alarm response may be to perform fire suppression if necessary b) Delete to evacuate nonessential personnel from the building and/or area, or to satisfy other requirements as announced over the building PA system " c) Move to bases "Remedial activities such as adjusting ventilation system shall be performed as necessary " And, change "shall" to "may"	a) E b) E c) E
7 3 4 4	Bases Fire suppression systems are crucial to safe operations If high temperatures or a fire should occur in a filter plenum, the sprinkler deluge system would automatically activate and initiate an alarm via the plant fire alarm system If a fire should occur within a room, the automatic sprinkler system is important to control extensive facility damage and prevent radioactive material from being involved	Only applies to exhaust and recirculation filter plenums	Before "filter plenum," add "exhaust and recirculation"	E
7 4 1	Text The operating status of the primary confinement system must ensure the confinement function	No value added	Remove "The operating status of the primary confinement system must ensure the confinement function "	E

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RISK REDUCTION AREA
BUILDING 779
OPERATIONAL SAFETY REQUIREMENTS ERRORS

OSR	REQUIREMENT	DEFICIENCY	ACTION	TYPE
7 4 1 3	Surveillance Oxygen concentration in the glovebox atmosphere shall be monitored by analyzers continuously Oxygen analyzers shall be tested and calibrated monthly Inert (nitrogen or argon) atmosphere required to process metallic Plutonium	B779 no longer processes Pu	**STUDY:** Remove 7 4 1 3 Inert Atmosphere, entire section No processing of Pu allowed in Building 779	P
7 4 1 4	Surveillance HEPA filter efficiencies shall be verified as acceptable (99 97%) before installation and (99 95%) after installation DOP test new filters and filters adjacent to new filters that share common hold-down brackets to verify that the overall stage efficiency meets the LCO stage efficiency requirement of 99 9% Periodically (not to exceed 18 months), perform DOP tests of one stage of each installed Zone I HEPA filter to verify LCO efficiencies	The efficiency of the HEPA filter only matters after installation	Remove "(99 97%) before installation and"	P (site)
7 4 1 4	Surveillance Verify the integrity of HEPA filters stages when plenum entry is required, by in-place visual inspection in accordance with approved contractor's procedures	No value added	Remove "Verify the integrity of HEPA filters stages when plenum entry is required, by in-place visual inspection in accordance with approved contractor's procedures "	P (site)

Error!

RISK REDUCTION AREA
BUILDING 779
OPERATIONAL SAFETY REQUIREMENTS ERRORS

OSR	REQUIREMENT	DEFICIENCY	ACTION	TYPE
7 4 1 4	Surveillance Tests of the sealing of gaskets for the housing door downstream of the last stage of HEPA filters shall be performed during, and in conformance with, tests performed for specification compliance With the doors closed and the fans operating, DOP aerosol shall be sprayed externally along a full linear periphery of each door to check the gasket seal Any detection (current instrument detection limits) of DOP in the plenum exhaust shall be considered an unacceptable test result, the gaskets shall be repaired, and test repeated	Test is not correctly performed and not required	Remove "With the doors closed and the fans operating, DOP aerosol shall be sprayed externally along a full linear periphery of each door to check the gasket seal Any detection (current instrument detection limits) of DOP in the plenum exhaust shall be considered an unacceptable test result, the gaskets shall be repaired, and test repeated "	D (site)
7 4 1 4	Surveillance Recirculation and exhaust fans shall be rotated monthly, i e , the standby fan shall be operated and the running fan shall be shutdown These fans shall be inspected by Utilities during shift tours	No recirculation plenums for Zone I	Remove "Recirculation and"	E
7 4 2	Surveillance HEPA filter efficiencies shall be verified as acceptable (99 97%) before installation and (99 95%) after installation DOP test new filters and filters adjacent to new filters that share common hold-down brackets to verify that the overall stage efficiency meets the LCO stage efficiency requirement of 99 9% Periodically (not to exceed 18 months), perform DOP tests of one stage of each installed Zone I HEPA filter to verify LCO efficiencies	The efficiency of the HEPA filter only matters after installation	Remove "(99 97%) before installation and"	P (site)

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OSR	REQUIREMENT	DEFICIENCY	ACTION	TYPE
7 4 2	Surveillance Tests of the sealing of gaskets for the housing door downstream of the last stage of HEPA filters shall be performed during, and in conformance with, tests performed for specification compliance With the doors closed and the fans operating, DOP aerosol shall be sprayed externally along a full linear periphery of each door to check the gasket seal Any detection (current instrument detection limits) of DOP in the plenum exhaust shall be considered an unacceptable test result, the gaskets shall be repaired, and test repeated	Testing is not performed correctly and not required	**STUDY:** Sitewide USQD to remove surveillance requirement	D (site)
7 4 2	Surveillance Exhaust and Recirculation fans shall be inspected by Utilities during shift tours	Missing surveillance	Add "Exhaust and Recirulation fans shall be rotated monthly "	E
7 4 4 1	Title Selective Alpha Air Monitors		Change to "- SECTION DELETED"	E
7 5	Text Entire Section	There are numerous errors in the Design Features section of the OSR for example a door in room 160 cannot be confirmed as a UL listed fire door and seismic upgrades are not credited These inaccuracies will be covered under the rewrite of the authorization basis	**STUDY:** Rewrite authorization basis	D (?) #24
7 6 1	Text All employees receive a new-hire orientation and an initial building indoctrination, followed by annual/biannual building indoctrinations On-the-job training is provided by supervisors as appropriate Some job classifications have formal training and certification requirements Emergency response indoctrination and training is also provided annually Safety meetings are conducted monthly for operating personnel and quarterly for office personnel (HSEM 86)	Name change, delete reference	Remove "(HSEM 86)"	E

"get data from 771 issues"

100%

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OSR	REQUIREMENT	DEFICIENCY	ACTION	TYPE
7 6 2	Text An internal review and change program for Building 779 is accomplished by • Configuration Control program • Facility Engineering reviews • Maintenance and Construction reviews' • Inspection and audits	Match name changes	Add "Change" after "Configuration" Deleted "Facility" Replace "Maintenance and Construction reviews" with "IWCP"	E
7 6 2	Text Configuration control applies to certain specialized war reserve (WR) production equipment, safety systems, standardized equipment, and to related engineering design documents, to prevent unauthorized or hazardous alternations to equipment or record documents Facility Engineering design projects, Maintenance Work Orders, and Construction projects are reviewed by the facility manager and the Health, Safety and Environment (HS&E) organization, and other support groups (e g , Fire Department and Quality assurance) to assure that changes meet applicable requirements	No longer applicable Name change	Remove "certain specialized was reserve (WR) production equipment, " Replace "Facility Engineering design projects, Maintenance Work Orders, and Construction" with "IWCP"	E
7 6 2	Text Under the building superintendent's direction, monthly safety inspections of operational areas and activities within B779 are conducted. These inspections are performed by a first line supervisor and representatives of the hourly and salaried work forces The results of these inspections are reported to B779 management. Routine inspections and audits by HS&E, Fire Department and other support groups also ensure that the facility is maintained in a safe condition	Eliminates references to names organizations	a) Replace "superintendent's direction" with "management" b) Remove "These inspections are performed by a first line supervisor and representatives of the hourly and salaried work forces "	a) E b) E

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OSR	REQUIREMENT	DEFICIENCY	ACTION	TYPE
7 6 3	The facility management reviews and approves all NMSLs, OSAs, and operational procedures before any operation which requires them is placed into service The HS&E manual (HSEM 86) also specifies safety procedures that apply to Building 779 operations	Eliminates references to names organizations	Change "(HSEM 86)" to "appropriate health & safety manual or equivalent"	E
7 6 3	Text Each operation that deals with fissile material shall have specific NMSLs established by Criticality Engineering The same applies to storage and transport of fissile materials in cans or drums Written limits of all operations involving fissile material shall be obtained from Criticality Engineering prior to startup Current limits shall be obtained and posted in the work area by line supervision Each area or operation in which fissile material is handled, stored, or transported shall be audited by a criticality safety engineer on a frequency determined in the Nuclear and Facilities Safety Procedures for Criticality Engineers manual (NFSPM 83) These audits are performed to ensure posting of limits in all necessary areas, to ensure compliance with requirements of limits, and to review the suitability of the limits for the operation performed Additional audits shall be performed by the operating groups to their own operation monthly An independent nuclear criticality safety assessment shall be performed annually Nuclear materials safety procedural infractions are violations of established NMSLs or Nuclear Criticality Safety policies and shall be reported and investigated per the HS&E Manual (HSEM 86) and DOE orders Selected infractions shall be reviewed at Nuclear Criticality Safety Committee meetings	a) Name change b) Will not always be completed monthly c) Name change	a) Change "on a frequency determined in the Nuclear and Facilities Safety Procedures for Criticality Engineers manual (NFSPM 83)" to "on a frequency determined by the criticality safety manual or equivalent" b) Replace "monthly" with "as required by contractor procedure" c) Replace "per the HS&E Manual (HSEM 86) and DOE Orders " with "appropriate health & safety manual or equivalent"	a) E b) P c) E

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OSR	REQUIREMENT	DEFICIENCY	ACTION	TYPE
7 6 3	Text An OSA applies to certain operations that could lead to undesirable consequences from operation of the equipment It establishes safe work practices that must be followed It also ensures that operations are reviewed and appropriate controls are established and implemented To prevent an accident, an OSA identifies the basic operational steps, potential hazards of each procedure, and appropriate hazard controls An approved OSA is required for those operations defined in HS&E Manual, Section 2 03, "Operational Safety Analysis" (HSEM 86), prior to startup or implementation of significant changes It shall be developed by the responsible supervisor in conjunction with the HS&E area safety team and other cognizant reviewers OSAs shall be reviewed annually by the responsible supervisor and the HS&E area representative/manager The HS&E area safety team shall audit OSAs for compliance on a random or need basis These reviews audits shall be documented	HSP no longer requires OSAs	Remove entire paragraph	P (site)

OSR	REQUIREMENT	DEFICIENCY	ACTION	TYPE
7 6 3	Text The Health, Safety & Environment Manual (HSEM 86) is a compilation of general safety procedures for the Rocky Flats Plant The purpose is to provide information that will help create a healthful and safe working place for all employees and to protect our environment and the surrounding communities This manual is intended to give direction in securing safety support. Supporting documents supplemental to the HS&E Manual are the Tritium Procedures Manual, Radiation Monitoring Procedures Manual, Radioactive Source Safety Training Manual, Respiratory Protection Manual, Industrial Hygiene Procedure Manual, Radiation Monitoring Training Program Manual, Calibration and Test Procedures, Criticality Safety Design Guide for Pu Processing Equipment, this Safety Analysis Report, and Nuclear Material Safety Manuals	Unnecessary wording	Remove entire paragraph	E
7 6 4	Text The Building 779 complex is managed by a building superintendent The superintendent is responsible for the safety of building personnel and for the administration of general building activities The superintendent's responsibilities relevant to safety include maintenance, housekeeping, building emergency support team and emergency response training, enforcement of operating procedures and general safety rules, and notification of any modification, actual or proposed, in facilities or operations that will impact the safety of any operations or which fall outside the scope of the approved Final SAR	Building is run and operated by Operations Manager/Shift Manager, but those titles change often	Remove "is managed by a building superintendent The superintendent " and replace with "operations management organization" Replace "The superintendent's" with "operations management's"	E

RISK REDUCTION AREA
BUILDING 779
OPERATIONAL SAFETY REQUIREMENTS ERRORS

OSR	REQUIREMENT	DEFICIENCY	ACTION	TYPE
7 6 4	Text Building 779 is also directly managed by other supporting groups, such as Utilities, Maintenance , HS&E, Quality Engineering & Control, Security, etc These supporting groups report through their organizations, but also have a matrix management responsibility to the building superintendent	Reflects more accurately the current situation	Replace "directly managed" with "supported" Remove "supporting" Replace "superintendent" with "management"	E
7 6 4	Text Similar to the building superintendent concept SAR summarized the HS&E functional and responsibilities	Not applicable	Remove entire paragraph	E

E editorial (non-technical)
D potential discovery
P process improvement (deletion of requirements)
[site] sitewide issue

LIST OF SARs, OSRs, TSRs, SERs, BIOs, BFOs, JCOs, and USQs FOR NUCLEAR FACILITIES

Sept 19, 1996
Rev 5

[FOOTNOTES (SHOWN IN PARENTHESES) FOLLOW THIS TABLE]

FACILITY ID	SAR			OSRs		TSRs		SERs	BIO		BFO		JCOs	USQs	COMMENTS
	Approved	Date	5480 23	Approved	Date	5480 22	Date		Approved	Date	Approved	Date			
CATEGORY 2 FACILITIES:															
371	X	1981		X	4/88									X *(2, 3, 4, 5, 6, 11, 12, 13, 14, 15, 16 28)*	Has approved PROVE Safety Assessment (1988)
374	X	1980		X	4/88									X *(4)*	
440															Authorization basis scheduled for completion during 3rd quarter CY 1996
559	X	1987				X	12/94							X *(2, 6)*	Has SAR Rebaseline for resumption, and approved TSRs (reformatted OSRs)
569														X *(31)*	Authorization basis scheduled for completion during 3rd quarter CY 1996
664	X	8/95	X			X	8/95	X						X *(29 32)*	
707	X	1987		X	3/95				X	9/94			X *(c)*	X *(1, 2 4, 6, 8 24 28)*	Has SAR Rebaseline for resumption, and approved BIO for thermal stabilization (This is Rev 2 of the resumption OSR)
771	X	1987		X	6/87								X *(a)*	X *(2 3 4, 6 9 11 19 22 28 34 35 36 37 39 40)*	JCO-95 0040-771-BAV involves a USQ Authorization basis scheduled for completion during 3rd quarter CY 1996
774	X	1987		X	6/87								X *(b)*	X *(4 26 30 38)*	JCO-95 0080-774-MAD involves a USQ
776/777	X	1987		X	6/87									X *(2, 3, 4 6 17 18 20 21 27 28 33)*	Incorporates approved ASRF FSAR (1985)
779	X	1987		X	6/87									X *(2, 3 4 6, 23, 28)*	
886	X	1964		X				X	X	10/95				X *(3, 7 10)*	BIO supersedes original SAR and Technical Specifications Rev 1 to BIO completed 10/95
991		1981		X	4/88									X *(4 6, 25)*	

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LIST OF SARs, OSRs, TSRs, SERs, BIOs, BFOs, JCOs, and USQs FOR NUCLEAR FACILITIES *(cont'd*

[FOOTNOTES (SHOWN IN PARENTHESES) FOLLOW THIS TABLE]

Sept 19, 1996
Rev 5

FACILITY ID	SAR			OSRs		TSRs		SERs	BIO		BFO		JCOs	USQs	COMMENTS
	Approved	Date	5480 23	Approved	Date	5480 22	Date		Approved	Date	Approved	Date			
CATEGORY 3 FACILITIES:															
444/447/448		1982													Authorization basis scheduled for completion during 3rd quarter CY 1996 via Site SAR
750/904 Pads	X	9/95	X			X	9/95	X							
881		1982													Authorization basis scheduled for completion during 3rd quarter CY 1996 via Site SAR
883		1982													Authorization basis scheduled for completion during 3rd quarter CY 1996 via Site SAR
884															Authorization basis scheduled for completion during 3rd quarter CY 1996 via Site SAR
903 Pad															Authorization basis scheduled for completion during 3rd quarter CY 1996 via Site SAR
906	X	8/94	X			X	8/94	X							SAR annual update completed 8/96
964															Authorization basis scheduled for completion during 3rd quarter CY 1996 via Site SAR
RCRA Unit 15A															Authorization basis scheduled for completion during 3rd quarter CY 1996 via Site SAR
OTHER FACILITIES:															
865		1982													Building 865 is a non-nuclear facility Authorization basis scheduled for completion 3rd quarter CY 1996 via Site SAR
910	X	3/93	X			X	3/93								Building 910 is a non-nuclear facility
Live-Fire Range				X	11/95			X							Risk Analysis Report (RAR) completed 1/95 and approved by DOE 11/29/95 RAR meets DOE Orders 5480 16A and 5481 1B
Site		1981													Work on Site SAR started FY94 - to be completed FY96 Draft delivered to DOE/RFFO 8/2/96 Final to be submitted to RFFO by 9/30/96 for approval

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FOOTNOTES / STATUS SUMMARY

NOTE #	ID # / TITLE DATE DECLARED (DOE NOTIFIED)	DESCRIPTION OF EVENTS RESULTING IN USQ	CURRENT STATUS OF COMPENSATORY MEASURES	CURRENT STATUS OF USQ
(2)	USQD-RFP-93 1170-TLF Pu storage issues including HSP/FLP 31 11 4/93	Existing condition· noncompliance with HSP/FLP 31 11 and the increase in the quantity of dispersible Pu oxides at RFETS Increase in probability and consequence of an accident previously evaluated (fire and criticality), exceeded criticality safety acceptance criteria (double-contingency principle), and a reduction in the margin of safety	OPEN Standing Order #21, issued on 5/4/93, established restrictions on handling potentially pyrophoric plutonium All affected Pu must be brought into compliance with procedure 1-82500-HSP-31.11, "Transfer and Storage of Plutonium for Fire Safety", before this compensatory action can be closed	DOE accepted the risk in letter ABG:JCS 07369 dated 4/12/96. Per Mani to Brockman letter 96-RF-01560 dated 3/14/96, this is no longer a USQ for Bldgs 771 and 779 These two buildings are back in compliance with HSP 31 11

FOOTNOTES / STATUS SUMMARY *(cont'd)*

NOTE #	ID # / TITLE DATE DECLARED (DOE NOTIFIED)	DESCRIPTION OF EVENTS RESULTING IN USQ	CURRENT STATUS OF COMPENSATORY MEASURES	CURRENT STATUS OF USQ
(3)	USQD-RFP-93 1503-GLS Raschig ring non-compliance with NMSLs/CSOLs 3/95	Numerous Raschig-ring-filled tanks for storing fissile solution were discovered to be out of compliance with their respective criticality limits Increase in probability of an accident (criticality) previously evaluated, not double-contingent NOTE NSTR-008 has been revised The USQD is being revised as a result of two recent events in 1995 with Raschig-ring-filled tanks that brought into question the safety basis and comp measures specified in the USQD These events involved two safety-related tanks, D292A in Bldg 371 and D501 in Bldg 886, in which liquid leaked into the tanks, thus apparently violating the comp measures The revision of the USQD and NSTR reexamines the basic assumptions of each, splits out the safety-related tanks from the USQD, and develops new comp measures	OPEN Extensive compensatory measures are in place to establish controls which ensure that no physical movement of fluid through gravity feed and/or mechanical transfer occurs in Raschig-ring-filled tanks. All Raschig-ring-filled tanks not in compliance with ring inspection and/or gamma scan requirements must be evaluated by Criticality Safety on a case-by-case basis to determine if new NMSLs/CSOLs are required Written approvals by Criticality Safety are required for continued use. For vessels that do not perform a safety function, the lack of performing gamma scans, volume calibration, and Raschig ring inspections can be compensated for by extensive controls (not listed) that remove dependence on Raschig rings and gamma scans for criticality control For vessels that are not in compliance with gamma scan, volume calibration, and/or Raschig ring inspection and cannot be isolated because they do perform a safety function, mandatory compensatory measures (not listed)	DOE accepted in letter NSEPD JCS 12600 dated 8/3/95 [1] RFFO concurs that numerous Raschig-ring-filled tanks are out of compliance with their respective limits [2] RFFO determined that no USQ exists provided the compensatory measures identified in the USQD are implemented [3] RFFO concurred that the listed compensatory measures are adequate to insure that the probability of an accident previously evaluated has not increased for tank noncompliances, and approved their implementation NOTE The USQD was originally completed with a "No" USQ conclusion, however, in March 1995, DOE was notified via letter that this is now an "As Found" USQ due to numerous Raschig-ring-filled tanks being out of

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FOOTNOTES / STATUS SUMMARY *(cont'd)*

NOTE #	ID # / TITLE DATE DECLARED (DOE NOTIFIED)	DESCRIPTION OF EVENTS RESULTING IN USQ	CURRENT STATUS OF COMPENSATORY MEASURES	CURRENT STATUS OF USQ
(4)	USQD-RFP-94 0615-ARS Nonresumption plutonium building HEPA filter plenum testing at RFP, Zones 1, 1A, and II 3/16/94	Nonresumption buildings test only 2 out of 4 HEPA filter stages, yet credit is taken for testing 4 stages Recent surveillance failure test data shows that final stage testing may not be adequate	Compensatory measures have been incorporated into applicable OSRs/TSRs Age testing remains to be completed	DOE/RFFO approved increased risk in letter NSEPD.JMC 09530 dated 9/27/94 Long-term actions to perform filter life testing remain
(6)	USQD-RFP-94 1186-BWW DOE plutonium ES&H vulnerability assessment, revision 1 3/22/95 Rev. 1 2/15/96	Issues raised in the Pu Vulnerability Assessment report led to discovery of an assumption in the FSARs which could no longer be maintained Some systems were found to have longer repair times than that assumed in applicable FSARs This leads to "yes" answers to increase in probability and consequence of a malfunction of equipment important to safety, and a malfunction of equipment important to safety of a different type	None required	DOE accepted risk in letters ABG JCS 07369 dated 4/12/96 and ABG JCS 07107 dated 6/27/96

FOOTNOTES / STATUS SUMMARY *(cont'd)*

NOTE #	ID # / TITLE DATE DECLARED (DOE NOTIFIED)	DESCRIPTION OF EVENTS RESULTING IN USQ	CURRENT STATUS OF COMPENSATORY MEASURES	CURRENT STATUS OF USQ
(7)	USQD-886-94.1378-GLS Bldg 886 potential criticality due to seismic event 9/94	Considers a discovered condition of existing storage of fissile solution in Raschig-ring-filled tanks that do not meet seismic standards in Bldg 886, Room 103 Previous analysis did not identify a natural phenomenon induced criticality Increase in probability and consequences of an accident (criticality) previously evaluated due to natural phenomenon	No USQD compensatory measures are required, however, the following corrective measures are in place to maintain the facility in a safe condition: [1] seismic restraints, and [2] elimination of water sources.	DOE approved in letter NSEPD JMC 11980 dated 12/14/94.
(23)	USQD-779-96 0274-ARS Discovered Pu holdup on gas purification unit filter for GB-1363, Room 154 2/29/96	This "as-found" condition evaluates the conditions and hazards associated with the discovery of a significant amount of Pu holdup in a gas purification unit filter in Bldg 779	No compensatory measures are required	DOE approved in letter ABG JCS 07400 dated 4/13/96

FOOTNOTES / STATUS SUMMARY *(cont'd)*

NOTE #	ID # / TITLE DATE DECLARED (DOE NOTIFIED)	DESCRIPTION OF EVENTS RESULTING IN USQ	CURRENT STATUS OF COMPENSATORY MEASURES	CURRENT STATUS OF USQ
(28)	USQD-RFP-96 0741-GLW Transport and handle SNM containing higher than normal americium 6/26/96	This proposed activity involves the packaging, handling, and onsite transport of SNM that may contain up to ≅ 1 weight-percent (wt-%) of americium, Am^{241}, in a salt matrix, and from ≅ 4 wt-% to ≅ 9 wt-% in a metal matrix The proposed activity involves several packages of SNM that contain larger amounts of Am^{241} than the weapons-grade plutonium mix (0 02 wt-%) assumed in the FSAR for each of the affected facilities This activity imposes an increase in consequences of a spill in Bldgs 371 and 707, spill and fire in Bldgs 771 and 779, and fire in Bldg 776/777	No compensatory measures are required	DOE approved in letter ABD JCS 07143 dated 7/15/96