

CORRES. CONTROL
OUTGOING LTR NO.

EG&G ROCKY FLATS

DOE ORDER 5480.31
94 RF 11612

EG&G ROCKY FLATS, INC.
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ISING, T.L.		
ANDLIN, N.B.		
CHWARTZ, J.K.		
ETLOCK, G.H.		
TEWART, D.L.		
TIGER, S.G.	X	X
<i>Edford JA</i>	X	X
<i>Keir RS</i>	X	X
<i>Mc</i>	X	X
<i>Reatzen K</i>	X	X
<i>Wells B.W</i>	X	X
<i>Broussard M.C.</i>	X	X
<i>Hellen J.P.</i>	X	X
<i>Herman B.P.</i>	X	X
<i>Angles D.P.</i>	X	X
<i>Quines H.B.</i>	X	X
CORRES CONTROL	X	X
MIN RECORD/080	X	X
TRAFFIC		
ATS/T130G		

November 17, 1994

94-RF-11612

F. R. Lockhart
Director
Environmental Restoration Major Systems Acquisition
DOE, RFFO

GRADED APPROACH READINESS ASSESSMENTS, SOLAR POND PROJECTS -
SRK-222-94

- Refs: (a) F. R. Lockhart ltr (5004-RF-93) to S. Keith, Building 910 Readiness Assessment Findings, November 22, 1993
- (b) S. R Keith ltr (93-RF-14753) to F. R. Lockhart, Special Assessment of the Accelerated Sludge Removal Project (ASRP), December 6, 1993
- (c) F. R. Lockhart ltr (0517-RF-94) to M. C. Broussard, Accelerated Sludge Removal Project Special Assessment, February 3, 1994
- (d) F. R. Lockhart ltr (01413-RF-94) to S. R. Keith, Applicability of DOE Order 5480.31 to the Special Assessment of the Accelerated Sludge Removal Project, April 6, 1994

DOE Action: Authorize the implementation of ERPD 2-G21-ER-ADM-18.03 for Solar Pond Projects (SPP) related readiness assessments (RA)

The EG&G Environmental Restoration Programs Division (ERPD) and Department of Energy (DOE), Rocky Flats Field Office (RFFO) have agreed upon the use of ERPD's graded approach to readiness assessments (RA) of Solar Pond Projects (SPP) activities, based upon their relatively low risks and hazards. This approach has utilized ERPD's readiness assessment procedure (2-G21-ER-ADM-18.03) rather than the more rigorous Rocky Flats Environmental Technology (Site) procedure 1-H24-ADM-10.01, based upon DOE Order 5480.31, Startup and Restart of Nuclear Facilities.

Under the Building 910 Facility Safety Analysis Review (FSAR), the Accelerated Sludge Removal Program (ASRP) was designated as a (low) Hazard Category 3 nuclear "facility". However, DOE, RFFO specifically endorsed ERPD's graded approach for the ASRP Special Assessment (SA). The ASRP SA also included a compliance analysis relative to DOE Order 5480.31 indicating that, although 18.03 is not written for the assessment of nuclear facilities, there was no technical or safety justification for an assessment under 10.01 and that the intent of the Order's core requirements was adequately addressed by the ASRP SA Checklist as developed and administered under 18.03.

In pursuing its graded approach RA policy, ERPD continues to encounter Hazard Category 3 classifications similar to that of ASRP. Indeed, any activity in Operable Unit 4 (OU 4) may fall in this category as a result of FSAR or Safety Analysis Report (SAR) determinations. The demolition of the Building 788 silos and the Operable Unit 4 (OU 4) Phase II RCRA [Resource Conservation and Recovery Act] Facility Investigation/Remedial Investigation (RFI/RI) are present examples. Other instances related to SPP also arise, such as the Repack/Restack of Pad 904. (The as yet unapproved FSAR for the 750 and 904 Pads also carries a classification of Hazard Category 3.)

CLASSIFICATION:

UNCLASSIFIED		
CONFIDENTIAL		
SECRET		

AUTHORIZED CLASSIFIER
SIGNATURE

DATE
REPLY TO RFP CC NO:

NOTATION: ITEM STATUS
PARTIAL OPEN
CLOSED
APPROVALS:

DATE & TYPIST INITIALS

Jan

F. R. Lockhart
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The cited FSARs' Hazard Category 3 (nuclear) classifications are based upon very conservative calculations for the volume (thresholds) of nuclear constituents. In accordance with Appendix 4 of 10.01, and based upon ERPD RA's interpretation of §2.1, Application, and §3.4, Readiness Assessments, ERPD believes that 10.01 is not reasonably applicable to SPP and SPP-related activities. Under the graded approach as applied by 10.01, the only assessment(s) that could be considered as applicable for SPP activities would be a Low Hazard Readiness Assessment (LHRA). However, since SPP activities are not the result of a "shutdown" as defined in 10.01; and, since ASRP, D&D, repacking, and other SPP-related activities are not generally either "new" or hazardous in the context of the Order, ERPD does not believe the LHRA under 10.01 is applicable.

ERPД believes, for the same reasons presented in the instance of ASRP, that RAs for SPP and SPP-related activities should continue to be administered under 18.03. This position is taken while acknowledging that RAs for nuclear facilities/ activities (even low Hazard Category 3) are not specifically within the present scope statement of 18.03. Therefore, all SPP activities might (technically) be considered to fall within the scope of Order 5480.31, and (conceivably) 10.01.

Until such time as 18.03 can be formally revised to include such low risk Hazard Category 3 activities/facilities within its scope, ERPD requests that you issue direction, similar to that provided for ASRP, authorizing the implementation of 2-G21-ER-ADM-18.03 for SPP-related RAs. A suggested draft response is attached.

If you have further questions regarding the above, please contact Dave Brown, X8745.



S. R. Keith
Program Manager
Solar Pond Projects
EG&G Rocky Flats, Inc.

DSB:clh

Attachment:
As Stated

Orig. and 1 cc - F. R. Lockhart

cc:
S. Howard
M. A. Witherill

DRAFT

Graded Approach Readiness Assessments for Solar Pond Projects

Attachment 1
94-RF-11612
Page 1 of 1

S. R. Keith
Program Manager, Solar Pond Projects
Environmental Restoration Programs Division
EG&G Rocky Flats, Inc.

The Environmental Restoration Major System Acquisition (ERMSA) has reviewed your request for direction regarding readiness assessments for Solar Pond Projects (SPP) and related activities, as expressed in memorandum 94-RF-11612 dated November 17, 1994.

Department of Energy (DOE), Rocky Flats Field Office (RFFO)/ ERMSA agrees that SPP and related activities do not warrant formal RAs in accordance with RFETS procedure 1-H24-ADM-10.01, Startup and Restart of Nuclear Facilities. So long as continued oversight by DOE, RFFO/ERMSA is facilitated in this regard, DOE, RFFO/ERMSA agrees that RAs for SPP and SPP-related projects should be conducted in accordance with 2-G21-ER-ADM-18.03, Environmental Restoration Programs Division (ERPD) Readiness Assessments.

SPP and related activities may be defined as "one time" activities whose risks and hazards are not significant in the context of DOE Order 5480.31, Startup and Restart of Nuclear Facilities, as opposed to "on-going" operations in nuclear designated areas which may pose greater risks and concerns. ERPD's RA program addresses, on a graded approach, criteria related to project management, regulatory compliance, equipment design, equipment testing and checkout, operations, safety, and training.

Rocky Flats Instruction 5700.6 outlines the policy of the Department to ensure that quality assurance requirements are clearly specified for the broad spectrum of work performed by DOE and its contractors. It is DOE policy to implement the graded approach to quality assurance. Quality assurance requirements are established to ensure that risks and environmental impacts are minimized and that safety, reliability, and performance are maximized through the application of effective management systems commensurate with the risks posed by the facility and its work. In addition, DOE Order 4700.1, Part D-Quality Assurance (QA), states that the project manager is responsible for defining and assuring effective implementation of required QA activities to be established and implemented by the contractor.

The Special Assessment for the Accelerated Sludge Removal Program (ASRP) demonstrated that the ERPD RA procedure is a cost effective method for fulfilling QA requirements. By its graded nature the ERPD RA process also ensures that risks to the public, the worker, and the environment are commensurately assessed and appropriate precautions are in place before the commencement of operations.

If you have any questions or require any additional information, please contact me on extension 8746.

Frazer R. Lockhart
Director Environmental Restoration
Major System Acquisition