



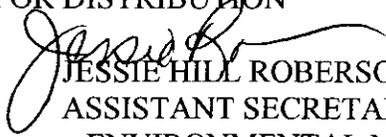
Department of Energy

Washington, DC 20585

December 10, 2002

MEMORANDUM FOR DISTRIBUTION

FROM:


JESSIE HILL ROBERSON
ASSISTANT SECRETARY FOR
ENVIRONMENTAL MANAGEMENT

SUBJECT:

Recent Issues Related to Nuclear Facility Safety Basis at
Environmental Management Nuclear Facilities

References:

1. Letter dated September 23, 2002, from John T. Conway to Secretary Abraham.
2. Letter dated November 4, 2002, from John T. Conway to Assistant Secretary Roberson on a Defense Nuclear Facilities Safety Board (DNFSB) review of documented safety analyses (DSAs) for high-level waste Concentration, Storage and Transfer (CST) facilities at the Savannah River Site.
3. Letter dated November 4, 2002 from John T. Conway to Assistant Secretary Roberson on two DNFSB reviews conducted at the Waste Treatment Plant (WTP) at the Hanford Site.

Several concerns were recently raised by the DNFSB regarding the preparation of DSAs and appropriate establishment of controls at the Department of Energy (DOE) nuclear facilities (see referenced letters). Improper implementation of DOE-STD-3009, *Preparation Guide for U.S. Department of Energy Nonreactor Nuclear Facility Documented Safety Analyses*, has been identified across the DOE complex. This includes issues such as non-conservative hazard analysis assumptions and improper use of DOE evaluation guidelines for determining classification of controls.

In light of the DNFSB's concerns, as well as feedback that I have received regarding EM field progress and issues related to the Safety Basis Rule (10 CFR 830, Subpart B) implementation, I am requesting that all sites provide the information as described below. This is deemed necessary so that I may gain a better understanding of the quality of safety basis documents being generated at EM sites, and the overall ability of Field sites to ensure a technically defensible and accurate DOE review of safety basis documents.



Within one month from the date of this memorandum, all EM Field Managers should provide the Office of Safety and Engineering (EM-5) the following information (to the maximum extent available, provide electronic submittals or reference the appropriate URLs):

1. DOE Field's direction/guidance to the contractor for generating DSAs/Technical Safety Requirements (TSRs);
2. Contractor's procedure for hazard categorization documents, DSAs, TSRs, Unreviewed Safety Questions (USQs), and other safety basis documents;
3. DOE Field's procedure for review and approval of DSAs, TSRs, USQs and other safety basis documents;
4. DOE Field resources involved in the review and approval process (include number of persons and their training/qualification and specify any support contractors involved in reviews);
5. The approval basis documentation (i.e., approval letters, SERs) for Category 2 nuclear facility DSAs/TSRs prepared to date for compliance with the Rule; and
6. A summary of actions planned and completed, as well as results related to assessment of the contractor's USQ process. This includes USQ screens, USQ evaluations, PISA process, USQ determination preparer/reviewer qualifications, timeliness, and annual summary reports.

If you have any questions, please call Ms. Sandra Johnson, Director, EM-5 at (202) 586-0651 or Mr. Dae Chung, Senior Technical Advisor, EM-5 at (301) 903-3968.

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