Department of Energy
Richland Operations Office
P.O. Box 550
Richland, Washington 99352

99-STO-045

MAY 6 1999

Dr. W. J. Madia, Director
Pacific Northwest National Laboratory
Richland, Washington 99352

Dear Dr. Madia:

CONTRACT NO. DE-AC06-76RL01830 - MEMORANDUM OF UNDERSTANDING (MOU) AND READINESS ASSESSMENT (RA) PLAN FOR THE NEUTRON MULTIPLIER FACILITY (NMF) DEACTIVATION PROJECT.

In response to the PNNL letter to me, from M. A. Williams, dated February 22, 1999, we have reviewed the MOU and the RA Plan for the NMF. The MOU and the RA Plan are hereby approved for use.

If any direction is provided by a Contracting Officer's Representative (COR), which your company believes exceeds the COR's authority, you are to immediately notify the Contracting Officer and request clarification prior to complying with the direction.

If you have any questions, please contact John Trevino of my staff, on (509) 372-2208.

Sincerely,

RF Christensen

Roger F. Christensen, Director
Science and Technology Operations
Division

STO:JET

Enclosure

cc: M. A. Williams, PNNL, w/encl.
N. E. Maguire-Moffit, PNNL, w/encl.
D. E. Robertson, PNNL, w/encl.

Readiness Assessment Plan
Neutron Multiplier Facility Deactivation, Project 28029

Battelle Northwest, Pacific Northwest National Laboratory

Prepared by: NE Maguire-Moffitt Date: 2/16/99
NE Maguire-Moffitt, RA Team Chairman
Environmental Sciences & Systems Analysis Division, Battelle Northwest

Concur: WJ Bjorklund for JD Burngardner Date: 2-19-99
JD Burngardner, Project Manager
Facilities and Operations Directorate, Battelle Northwest

JE Trevino Date: 4/28/99
JE Trevino, Facility Representative
Science and Technology Operations Division,
DOE Richland Operations Office

Approve: RF Christensen Date: 5/6/99
Roger F. Christensen, Manager
Science and Technology Operations Division,
DOE Richland Operations Office

Readiness Assessment, Neutron Multiplication Facility Deactivation, Project 28029

1.0 Introduction

This Readiness Assessment (RA) Plan describes the RA that will be conducted prior to authorizing the start of activities to deactivate the Neutron Multiplier Facility (NMF), Project 28029. The purpose of Project 28029 is to safely deactivate the NMF by removing the existing uranium inventory, disassembling the fuel array and re-packaging it for subsequent final disposal. The project also involves other activities to decontaminate the facility down to releasable limits, however these are not considered part of the RA.

Pacific Northwest National Laboratory (PNNL) is responsible to the Department of Energy (DOE) for management and operations of two facilities involved in this project, that is, the 329 Building Annex and the Radiochemical Processing Laboratory (RPL). PNNL has the lead in deactivation of the NMF. Facility Transition Manager, John Bumgardner, of the Facilities and Operations Directorate, is responsible for certifying readiness to begin the RA process. The PNNL RA Team leader is Nancy Maguire-Moffitt. The Science and Technology Operation Division (STO) of RL has final approval authority.

1.1 Project Description

The NMF, located in the 329 Building Annex, is a sub-critical assembly that was designed for neutron irradiation of biological and geological materials. During the life of the NMF, the capability of the facility has decreased with the natural decay of the sources coupled with other options being available to perform the desired programmatic work. Consequently, PNNL has elected to deactivate the facility. This deactivation activity necessitates draining the water-filled pool, removal and disassembly of the uranium core, and subsequent shipping of the fuel pins. The uranium core will be removed from the 329 Building Annex, transferred to and disassembled in the Radiochemical Processing Laboratory (RPL), and shipped to Savannah River.

Neutron Multiplier Facility

The NMF core consists of 257 rods in an annular hexagonal array. The assembly is 11 inches wide by 21 inches high and weighs approximately 115 pounds. It is located approximately 15 feet deep, near the bottom of a water-filled cylindrical pool. The fuel assembly contains an inventory of radioisotopes, which generate neutron and beta-gamma radiation. The quantity of enriched fuel requires strict control of the NMF for safeguard reasons. Disassembly of the core will require that these controls remain in effect until the materials are disassembled and the quantities repackaged to allow reclassification.

Radiochemical Processing Laboratory

The RPL (Building 325) is a hazard category 2 nuclear facility located immediately adjacent to the 329 Building. The RPL will receive the core for disassembly and repackaging for shipment offsite. These activities will be performed in the RPL hot cell facilities.

2.0 Start/Restart Designation

PNNL performed an evaluation for the need for an Operational Readiness Review (ORR) or a RA for this project. It was determined that this project has specific criticality operational requirements and involves several unique operational activities therefore, PNNL believes that a RA is the appropriate mechanism for

verifying readiness of the activities associated with removal, disassembly and storage of the uranium core until it is shipped offsite.

3.0 Scope (Breadth and Depth) of the Readiness Assessment

A graded approach will be used in the execution of the RA. The graded approach is the process by which the RA is adjusted in depth of detail required and magnitude of resources expended. This adjustment provides for a level of attention that is commensurate with the project's potential to adversely impact safety, security, environmental compliance, or activities of programmatic importance. The RA will evaluate the adequacy of the preparedness of the staff, documentation, and equipment involved in the project.

The MOU specifies the scope of the RA to be the uranium core removal activity. Accordingly, this RA will focus on activities associated with the handling of the uranium, specifically the *removal; disassembly and storage* of the core to ensure safeguard requirements. This RA will consist of independent, systematic, and documented performance-based reviews to validate that selected project activities are ready to be performed.

The RA will <u>not</u> include:

- Core examination activities that can not affect the structural integrity of the core nor pool draining activities (provided these activities are consistent with prior approved activities that have been conducted at the NMF).
- Transportation or shipping activities subsequent to the disassembly of the core, that are routinely performed in the normal course of business in the RPL (325) facility.
- Renovation activities in the 329 Building Annex subsequent to removal of the core.

Criteria and Review Approaches (CRA)

The following review criteria and review approaches will bound the scope of the RA. These criteria are expressed as objective statements to be evaluated against specific criteria identified in DOE Orders, regulatory requirements, applicable policies, etc. Within each criterion are listed the areas that define the depth of the review.

Staffing, documentation, and hardware establish the foundation of readiness to perform an activity. Accordingly, the RA criteria will review the following areas to determine if the level of attention provided is commensurate with the project's potential to adversely impact safety, security, environmental compliance, or other activities of programmatic importance.

<u>RA Criterion 1: Procedures and Safety Limits</u>

1.1 Scope: There are adequate, correct, and approved procedures and safety limits for performing core removal, disassembly, and storage activities.

1.2 Scope: There are adequate, correct, and approved procedures for operating the process systems and utility systems associated with NMF equipment.

1.3 Scope: Emergency preparedness plans and responses related to NMF project operations are identified. This includes an understanding of reportable events and notification methods used in PNNL facilities.

RA Criterion 2: Staffing, Training and Qualifications

2.1 Scope: A review will be conducted to ensure there are sufficient staff to perform core removal and disassembly activities. It is expected that the Project and Line Management personnel will clearly define and implement the requirements needed to safely perform this project. This includes identifying the number of workers required to operate equipment and the basis on which operations will be done (e.g., back shift operations).

2.2 Scope: A review will be conducted to verify that qualifications have been established for conducting fuel handling activities related to the NMF project in 325 and 329 Buildings.

2.3 Scope: A review will be conducted to ensure NMF personnel have been trained and are qualified to the approved procedures.

2.4 Scope: The ability of the NMF personnel to safely use the procedures will be evaluated. Performance based observations will be conducted for selected activities (e.g., fuel transfer, disassembly operations, operating procedure validations, criticality safety specifications, mockup training, or functional tests) associated with training to verify an appropriate level of knowledge of related activities.

RA Criterion 3: Safety Envelope

3.1 Scope: A review will be conducted to ensure that an Unreviewed Safety Question Determination was performed and approved for the NMF project. If the project presents a USQ, a supplement or revision of the 325 SAR has been prepared and approved.

3.2 Scope: A review will be conducted to verify an analysis of the hazards associated with NMF project activities in 329 building has been performed and approved.

3.3 Scope: A review will be conducted to verify that mitigating measures identified to protect the safety of the workers and public from the hazards/risks associated with the NMF project have been incorporated into criticality safety documentation or procedures as appropriate.

RA Criterion 4: Operability of Safety Systems

4.1 Scope: A review will be conducted to verify that the Criticality Alarm System (CAS) coverage has been evaluated for the NMF project activities in 325 and 329 buildings.

4.2 Scope: A review will be conducted to verify preventive maintenance and testing related to the criticality alarm system is current and detector instruments are calibrated. This includes any potential supplementary monitoring equipment identified for NMF project related work.

RA Criterion 5: Project Controls and Administration

5.1 Scope: A review will be conducted to verify clear Roles, Responsibilities and Authority and Accountabilities are defined for NMF project activities.

5.2 Scope: A review will be conducted to ensure that a Memorandum of Understanding (MOU) between PNNL and DOE RL has been approved and issued to ensure all parties agree to the terms of NMF deactivation.

5.3 Scope: A review will be conducted to verify appropriate management control documents have been prepared and approved. (e.g., project management plan, waste management plan, NEPA documents, lift plan, prep & risk analysis, QA plan, health & safety plan, etc.)

5.4 Scope: A review will be conducted to verify NMF Project Management, 325 and 329 Facility Line Management have completed and documented walkthrough inspections of project work spaces and determined that deactivation activities are ready to begin.

RA Criteria 6: ES&H

6.1 Scope: A review will be conducted to verify a project ES&H plan has been prepared and approved. There shall be no unresolved safety issues prior to the start of the project.
6.2 Scope: The ES&H plan or another approved document identifies appropriate contingency plans describing actions that will be taken in the event of an emergency during loading, transportation, unloading or disassembly.
6.3 Scope: A review will be conducted to verify that personal protective equipment has been identified for project activities and is readily available.
6.4 Scope: A review will be conducted to verify project procedures adequately address lock and tag requirements.
6.5 Scope: A review will be conducted to verify a lift plan has been developed and approved for removing the uranium core.
6.6 Scope: A review will be conducted to verify plans have been made for transporting the core from 329 to 325 building. Plans shall include appropriate personnel safety aspects during transport.
6.7 Scope: A review will be conducted to verify that ALARA reviews have been performed for this project.
6.8 Scope: A review will be conducted to verify that technical work documents and radiological work permits have been prepared, approved and posted for all activities associated with this project in both 325 and 329 buildings.
6.9 Scope: A review will be conducted to verify that all required radiation monitoring instruments are in place, calibrated and operational.
6.10 Scope: A review will be conducted to verify that a Notice of Construction (NOC) permit has been issued, if applicable.
6.11 Scope: A review will be conducted to verify NEPA reviews have been conducted and documented.
6.12 Scope: A review will be conducted to verify that monitoring of any potential project effluent meets current requirements.
6.13 Scope: A review will be conducted to verify the project has ensured a viable disposal pathway for any project related waste streams.
6.14 Scope: A review will be conducted to verify that a Criticality Safety Specification (CSS) has been prepared and approved for NMF activities.
6.15 Scope: A review will be conducted to verify that CSS requirements have been incorporated into operating procedures.

RA Criteria 7: Transportation

7.1 Scope: A review will be conducted to verify that a transportation plan for movement of the uranium core between 329 and 325 has been developed and approved.
7.2 Scope: A review will be conducted to verify that appropriate transportation containers have been identified and obtained for transferring the uranium core between facilities and for transportation of the fuel pins to their ultimate disposal location.
7.3 Scope: A review will be conducted to verify that the project has ensured the transfer and shipping containers are compatible with the 325 Building mini-hot cell load out system.
7.4 Scope: A review will be conducted to verify that a Radioactive Shipment Record has been prepared and approved for the NMF project activities.

RA Criteria 8: Safeguards and Security

8.1 Scope: A review will be conducted to verify that Nuclear Materials Management has been informed of the NMF projects intention to transfer nuclear material from 329 to 325 and then offsite. Required reviews and approvals have been obtained.

8.2 Scope: A review will be conducted to verify that required notifications have been made and approvals granted prior to any fuel transfers.
8.3 Scope: A review will be conducted to ensure the NMF project has obtained any special equipment required for disassembling the core.

RA Criteria 9: Conduct of Operations

9.1 Scope: A review will be conducted to verify that the existing elements of DOE Order 5480.19, Conduct of Operations have been utilized in a graded approach to NMF project activities within the 325 and 329 Buildings.

RA Criteria 10: Facility & Project Design Preparations

10.1 Scope: A review will be conducted to verify that any preventive maintenance (PM) procedures associated with equipment related to NMF project activities are complete for the current period.
10.2 Scope: A review will be conducted to verify that any Measure & Test Equipment required for project activities is available and calibrated.
10.3 Scope: A review will be conducted to verify that the project has ensured the cranes, hoists, and rigging equipment used for NMF project activities is current on maintenance and inspections.
10.4 Scope: A review will be conducted to verify the NMF project has determined all required equipment in 329 and 325 mini hot cell is operable.
10.5 Scope: A review will be conducted to verify that the project has completed any facility or equipment modifications required for NMF activities in 325 and 329 buildings.

4.0 RA Prerequisites

The prerequisites (PR) identified below provide the baseline information used to assess line management and project readiness. The management assessment of the NMF deactivation project will ensure that each PR is complete prior to the beginning of the RA. Each prerequisite is applicable only to the specific interface with the NMF deactivation project. A cross-reference of the prerequisites to applicable core requirements (CR) identified in PNNL-MA-97, Appendix B, is provided in parenthesis.

PR-1 NMF procedures required for safe operation are developed, validated, approved, and present in the appropriate work place. A document control system is in place to control procedure changes. Procedures and safety basis documentation reflect NMF operations. (CR-1, 14,15,18)

PR-2 Staffing, training and qualification necessary and sufficient to support testing and NMF operations is verified. (CR-2, 8,13,18,19)

PR-3 The knowledge and performance level of assigned NMF staff is appropriate as determined by observations, interviews, or examinations if applicable. (CR-3, 14)

PR-4 Configuration management and control programs necessary and sufficient to support safe NMF deactivation are in place. (CR-4, 6, 8, 15)

PR-5 Required NMF project related calibration and preventive maintenance actions are complete for the current period. (CR-5, 8)

PR-6 Management programs necessary and sufficient to support NMF deactivation operations are in place. (CR-8, 9)

a. Shielded Facility Operations
b. Environmental & Waste Management
c. Industrial Safety & Hygiene
d. Emergency Preparedness
e. Engineering Support
f. Radiological Protection

PR-7 Criticality Safety Specifications are approved, implemented, and reflected in appropriate NMF procedures. (CR-8)

PR-8 Personnel associated with the NMF project have demonstrated proficiency in response to off-normal and emergency response scenarios for NMF deactivation operations. (CR-3, 8, 9, 14).

PR-9 Qualifications, assignments, responsibilities, and reporting relationships for personnel involved in NMF deactivation operations are documented, defined, and understood. (CR-11, 19).

PR-10 A Management assessment of the NMF project in the 325 and 329 Buildings is complete and readiness to startup is documented. Management certifies that these prerequisites have been completed and readiness for RA review achieved. (CR-7, 11, 19)

5.0 RA Process

The RA will be conducted using performance-based inspections, document reviews, and interviews to document project readiness. RA team members will perform their evaluation of the project using the RA criteria and document the review on the Readiness Assessment form. The assessment form will include the RA criteria scope number, personnel contacted, records reviewed, evolutions witnessed (i.e., ATP, OTP, PM, etc.), locations visited, discussion of the performance against criteria, conclusions, and team members signature.

Performance based inspections will include field observations in areas such as NMF deactivation operations, equipment readiness and mock up training. Subject matter of the RA review will be divided among team members in accordance with their individual preferences or area of expertise, so that all of the review criteria are addressed. The RA Team recognizes and accepts that some project preparation activities may still be in progress and considers it appropriate to begin reviews on portions of the project as they are completed. This process will ensure a more comprehensive review by observing readiness related activities as they occur. It will also help to ensure that the RA is completed in a timely manner and provides for early identification and resolution of potential concerns.

A RA Team member will be assigned the lead role for evaluating each of the review areas. The lead team member will use other team members, staff not currently assigned to the RA, and other resources as necessary to adequately review each section of his/her assigned subject area.

The RA Team will have responsibility for determining which methods (interviews, observations, document reviews, etc.) are to be used in their evaluation of each review criteria. Sufficient review will be performed to support the conclusion that the NMF deactivation project is ready to begin. When the RA Team determines that the NMF project is ready to begin, the RA Team will recommend that the Project issue a Readiness to Proceed Memorandum, which will require DOE-RL approval to begin project activities.

6.0 Administration

Team members will submit to the team leader a description of the tasks observed, material reviewed, persons interviewed, and sufficient evaluation to support their recommendations using the RA Criteria

Assessment Form. Specific items of concern identified by team members will be documented on the RA Criteria Deficiency Form.

A graded approach will be used in determining if a deficiency is to be considered as requiring pre-start or post-start corrective action. A pre-start deficiency is one that meets one or more of the following criteria:

- Involves processes, functions, or components identified in the RPL Operational Safety Requirements (OSRs)
- Involves potential adverse environmental impact exceeding regulatory or site specific release limits
- Impacts worker health and safety
- Indicates a lack of adequate operating procedures
- Requires important training not specified in existing facility training requirements
- Is a piece of equipment required to be operable to remove, disassemble, or repackage the core

Any items not in one of these categories will be addressed as a post-start deficiency, however the RA team reserves the right to elevate a deficiency to pre-start based on potential health, safety, and/or environmental concerns.

Records of the RA will include RA evaluation forms submitted by the team members and copies of documents reviewed or a reference to permit retrieval of the documents. Any documents that are provided by the Project to support their readiness will be assumed to be retained by the Project and will not be retained as records by the RA Team.

RA progress will be reported by each team member at team meetings, on a frequency to be determined. A representative of the Project and DOE-RL will attend the team meetings to be briefed on issues the team may have found during their reviews and to provide updated project status reports to the RA Team. These meetings will provide a forum for discussion, evaluation, and a method to resolve any areas of misunderstanding for issues related to the Project and the RA Team.

The RA Team will continue their review until the team members collectively conclude that sufficient data have been obtained to support a recommendation by the RA Team.

7.0 Reporting and Resolutions

The RA report will be issued to the NMF Project on readiness to commence operations when all the RA review criteria have been addressed and reviewed. The RA Team will summarize the review activities they have conducted, the results of performance assessments, and the personnel interviewed. Although the team member will initially identify items as either pre- or post-start deficiencies, the RA team will review these assignments and determine the final categorization so that a graded approach is applied uniformly. Post start items should also identify an appropriate time frame for completing the action.

The RA report will provide the RA Team conclusions and the bases for those conclusions. The report will cover findings by the RA Team and identify those findings as pre-start or post-start requirements. The NMF deactivation project is responsible for tracking open post-start items to ensure completion. The report will include a section describing lessons learned during the RA. RA team members will be given the opportunity to include a discussion of differing professional opinion, general comments, and observations. Submission of the final report will complete the work of the RA team. The RA Team leader, on an individual basis as required, will verify any remaining post-start items.

8.0 Schedule

The estimated start date for the RA is late May 1999, based on current project schedules. Prior to this date, the RA team will have the opportunity to witness project mock-up training demonstrations as they occur during planned project-testing activities. It is anticipated that DOE-RL will perform normal oversight activities during the performance of project testing, training and during the RA process.

9.0 Review and Approval

The designated official to approve start of the contractor RA is John Bumgardner, Manager of Facility Transition, Facility & Operations Directorate. The official to approve project commencement is Roger Christensen, Director, Science and Technology Operations, U.S. Department of Energy, Richland Operations Office.

10.0 References

"Memorandum of Understanding (MOU) for Deactivation of the Neutron Multiplier Facility, 329 Building Annex," MA Williams to RF Christensen, August 6, 1998.

Project Management Plan, NMF Deactivation, Project 28029, June 4, 1998.

Memo, John Bumgardner to Donna Lucas, "Neutron Multiplier Deactivation Project Readiness Assessment Team," October 5, 1998.

11.0 Attachments

Attachment A - RA Criteria Assessment Form
Attachment B - RA Criteria Deficiency Form
Attachment C - RA Team Members and Assignments

RA CRITERIA ASSESSMENT FORM

RA Criteria:	RA Number/Title:	Date:

Scope (short narrative description):

Personnel contacted/position:

Records & other documents reviewed:

Evolutions/operations witnessed:

Locations visited:

Discussion:

Conclusion:

Assessed by:	Approved by: _____ RA Team Leader Date:

RA CRITERIA DEFICIENCY FORM

RA Criteria:	RA Number/Title:	Date: ID #:

RA Criteria Requirement:

Reference(s) (specific as to section):

Issue/Discussion:

Conclusion:

Finding Designation: Pre-start _____ Post-Start_____	Assessor:
Issue Tracking Number	Approved:_____ RA Team Leader Date:

RA Team Members and Assignments*

Member Name	RA Subject Area
Scott Allen	Industrial Safety
Jim Cartmell	Transportation/Shipping Activities
Joe Jacobson	Radiation Protection
Dick Libby	Criticality Safety
Donna Lucas	Authorization Basis
Nancy Maguire-Moffitt	Conduct of Operations
Mark Mitchell	Training
Roger Sharp	Safeguards and Security

*Other operational or technical areas may be added at the discretion of the RA Chairman

Issue Date: May 1996

Appendix B
ORR Core Requirements

Each of the core requirements listed below, as a minimum, must be addressed when developing the breadth of an Operational Readiness Review (ORR). Justification must be provided in the Plan-of-Action, if it is determined that a particular core requirement is not applicable or will not be reviewed. The Plan-of-Action may reference a timely, independent review which addressed the requirements in a technically sound manner to justify not performing further evaluation of a core requirement during conduct of an ORR. A graded approach, defined in Appendix A, will be used to determine the level of analysis, documentation, and/or actions necessary to evaluate the core requirements listed below or other core requirements in the defined breadth of the ORR. The minimum core requirements are as follows:

- There are adequate and correct procedures and safety limits for operating the process systems and utility systems.
- Training and qualification programs for operations and operations support personnel have been established, documented, and implemented (the training and qualification program encompasses the range of duties and activities required to be performed).
- Level of knowledge of operations and operations support personnel is adequate based on reviews of examinations and examination results, and selected interviews of operating and operations support personnel.
- Facility safety documentation is in place that describes the "safety envelope" of the facility. The safety documentation should characterize the hazards/risks associated with the facility and should identify mitigating measures (systems, procedures, administrative controls, etc.) that protect workers and the public from those hazards/risks. Safety systems and systems essential to worker and public safety are defined and a system to maintain control over the design and modification of facilities and safety-related utility systems is established.
- A program is in place to confirm and periodically reconfirm the condition and operability of safety systems, including safety-related process systems and safety-related utility systems. This includes examinations of records of tests and calibration of safety system and other instruments which monitor limiting conditions of operation or that satisfy Technical Safety Requirements. All systems are currently operable and in a satisfactory condition.
- A process has been established to identify, evaluate, and resolve deficiencies and recommendations made by oversight groups, official review teams, audit organizations, and the operating contractor.
- A systematic review of the facility's conformance to applicable U.S. Department of Energy (DOE) Orders has been performed, any nonconformances have been identified, and schedules for gaining compliance have been justified in writing and formally approved.
- Management programs are established, sufficient numbers of qualified personnel are provided, and adequate facilities and equipment are available to ensure operational support services (e.g., training, maintenance, waste management, environmental protection, industrial safety and hygiene, radiological protection and health physics, emergency preparedness, fire protection, quality assurance, criticality safety, and engineering) are adequate for operations.
- A routine and emergency operations drill program, including program records, has been established and implemented.
- An adequate start-up or restart test program has been developed that includes adequate plans for graded operations testing to simultaneously confirm operability of equipment, the viability of procedures, and the training of operators.
- Functions, assignments, responsibilities, and reporting relationships are clearly defined, understood, and effectively implemented with line management responsible for control of safety.
- The implementation status for DOE Order 5480.19, "Conduct of Operations Requirements for DOE Facilities," is adequate for operations.

- There are sufficient numbers of qualified personnel to support safe operations.
- A program is established to promote a site-wide culture in which personnel exhibit an awareness of public and worker safety, health, and environmental protection requirements and, through their actions, demonstrate a high priority commitment to comply with these requirements.
- The facility systems and procedures, as affected by facility modifications, are consistent with the description of the facility, procedures, and accident analysis included in the safety basis.
- Modifications to the facility have been reviewed for potential impacts on procedures and training and qualification. Procedures have been revised to reflect these modifications and training has been performed to these revised procedures.
- The technical and management qualifications of contractor personnel responsible for facility operations are adequate.

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