

**Assessment of Operational Readiness of the General Service  
204-AR Rail Car Unloading Facility Fire Protection System**

**Site:** Office of River Protection Hanford

**Facility:** Tank Farms, 204-AR Rail Car Unloading Facility

**System:** Fire Protection System

**System Classification:** General Service System

**System Safety Function:** Provide Fire Detection and Fire Suppression Coverage for the 204-AR Rail Car Unloading Facility

**OBJECTIVE:**

**VSS-1** This vital safety system is operational and personnel and processes are in place that ensures its continued operational readiness.

**VSS-1.1** VSS safety functions are defined and understood by responsible line managers, and supporting information/documentation is available and adequate. System testing is adequate to ensure operability. (Review Approach items 1, 2, 3 and 7)

Discussion of Results –

The 204-AR Rail Car Unloading Facility has a fire detection system and a fire sprinkler system installed. The functions of the fire detection and suppression systems are to be maintained, as they are required for safe operation of the facility. The Tank Farm Final Safety Analysis Report (HNF-SD-WM-SAR-067) does not identify any fire protection systems as Safety Class, Safety Significant, or Defense in Depth. Department of Energy (DOE) Order, DOE 5480.7A, "Fire Protection" establishes the requirements for contractor fire protection programs.

As defined in Section 11.5.2 of the FSAR the fire protection program shall:

- Minimize the potential for the occurrence of a fire or related perils by implementing industry standards and reduced-risk criteria on fire protection and prevention.
- Ensure that fire does not cause an unacceptable onsite or offsite release of hazardous material that will threaten the public health and safety or the environment.
- Establish requirements consistent with NFPA 101-1994, *Life Safety Code*, to provide an acceptable degree of life safety to DOE and contractor personnel and to ensure that the public will not be exposed to undue hazards associated with fire and its effects in DOE facilities.
- Ensure that process controls and safety systems are not damaged by fire or related perils.

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The current Fire Hazards Analysis (WHC-SD-WM-FHA-020, Rev. 0) identifies that in the event that the products of combustion should enter the radiation zone exhaust system, heat detectors installed in the ductwork can actuate a water spray nozzle installed prior to the first HEPA filter. This spray nozzle will prevent any fire from involving the HEPA filters.

Facilities with a fire loss replacement cost exceeding \$1M require automatic fire suppression systems. All fire protection systems are inspected, tested, and maintained in accordance with National Fire Protection Association (NFPA) Codes as implemented through the Standards/Requirements Identification Document (HNF-SD-MP-SRID-001, Section 12.8). The implementation of NFPA codes for fire protection system testing, inspection and maintenance are detailed in HNF-IP-0842, Volume IX, Section 5.6, "Fire Protection System Testing, Inspection and Maintenance." The Hanford Fire Department using their procedures conducts testing on the fire protection system equipment; however, HNF-IP-0842, Volume IX, Section 5.6 specifically states "Although support in achieving the requirements of this section is provided by the Hanford Fire Department, the final responsibility for ensuring full compliance with this section shall belong to facility management."

Configuration management of the system design media for fire protection systems is maintained under the CH2M HILL Hanford Group, Inc. (CHG) procedures. Drawings and other design media are available for the fire detection and suppression systems installed in the 204-AR facility. Necessary and adequate procedures and policies are in place and have been effectively implemented supporting the conclusion that management understands their responsibilities.

- VSS-1.2** The backlog for surveillances, tests, inspections, maintenance, repair, upgrades, or other work on the system is managed and kept to an appropriate minimum. (Review Approach item 6)

### Discussion of Results –

Testing is accomplished at the frequencies established by the RPP fire protection maintenance program. The Hanford Fire Department conducts testing of the fire protection system components. The current Fire Hazards Analysis (WHC-SD-WM-FHA-020, Rev. 0) identifies that the solenoid valve used to actuate the water spray nozzle (in the exhaust system) is U. L. listed and the heat detectors are removed and tested periodically to ensure operability. The testing does not allow flow of water through the solenoid valve into the HVAC duct. The HEPA filters are not degraded due to the preventative maintenance testing. Repairs are performed as components and/or systems fail. No backlog exists for this facility.

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There is one upgrade under consideration. A plan is being developed to replace the existing (obsolete) fire alarm panel in the future. Although, the existing fire alarm panel is in good operational status, very few spare parts are available for maintaining the existing fire alarm panel. Should the fire alarm panel fail a fire watch would be instituted until the issue is resolved. A one time cost for the fire alarm panel replacement outweighs the potential costs involved with repeated entries to provide fire watch coverage.

**VSS-1.3** Configuration Management and Maintenance programs effectively ensure operational availability of the system. (Review Approach items 5, 8 and 9)

### Discussion of Results –

Procedure HNF-IP-0842, Volume IX, Section 5.4, "Fire Hazards Analysis/Fire Protection Facility Assessment Requirements" establishes the criteria for conducting formal assessments of CHG facilities. All Tank Farm Fire Protection Facility Assessments are conducted at frequencies established in this procedure. The procedure is in accordance with DOE Order 5480.7A, "Fire Protection."

A complete update/rewrite of the Tank Farm Fire Hazards Analysis has been funded and scheduled for completion during FY 2001.

A fire protection assessment is performed every three years on the 204-AR facility, under the direction of a qualified fire protection system expert (as specified in HNF-IP-0842, Volume IX, Section 5.4, "Fire Hazards Analysis/Fire Protection Facility Assessment Requirements"). A qualified fire protection engineer trends the fire protection systems availability. In addition, a qualified fire protection engineer performs trending of the equipment failures.

Power operators perform scheduled tests on the emergency lights (for access and egress) per procedure.

Procedure HNF-IP-0842, Volume IX, Section 5.1, "Fire Protection Program," assigns the overall lead for the River Protection Project (RPP) Fire Protection Program to the RPP Safety & Health organization. The RPP Safety and Health organization is responsible for ensuring "testing/inspection/preventive maintenance for fire protection systems are performed in accordance with HNF-IP-0842, Volume IX, Section 5.6." The Hanford Fire Department performs and documents the inspection, testing and maintenance of fire alarm and fire suppression systems, maintains all records of inspection/testing, and manages the fire system impairment tracking system (in accordance with HNF-PRO-372, "Hanford Fire Department"). RPP facility management is responsible for scheduling, authorizing and establishing appropriate facility conditions per HNF-PRO-372, Section 2.2, and HNF-IP-0842, Volume IX, Section 5.1, "Fire Protection Program."

Drawings and other design media (e.g., supporting documents) supporting the 204-AR fire protection system are maintained per the following non-inclusive list of established engineering procedures.

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- HNF-IP-0842, Volume IV, Section 3.5 – Engineering Documents
- HNF-IP-0842, Volume IV, Section 4.25 – Equipment Temporary Modifications and Bypasses
- HNF-IP-0842, Volume IV, Section 4.29 – Engineering Document Change Control Requirements
- HNF-IP-0842, Volume IV, Section 5.4 – Unreviewed Safety Question Requirements
- RPP-PRO-1819 – Engineering Requirements
- HNF-PRO-224 – Document Control Program Standards

Documentation to allow field work/modifications to be performed on the 204-AR fire protection system shall be in accordance with the RPP work control process (HNF-IP-0842, Volume V, Section 7.1 – Tank Farm Contractor Work Control) and the Hanford Fire Departments procedures.

Maintenance, test, and operating procedures/roundsheets are generated and modified per the RPP procedure (HNF-IP-0842, Volume I, Section 2.11- Technical Procedure Control and Use). In addition, test procedures meet the requirements referenced within the RPP testing procedure (HNF-IP-0842, Volume IV, Section 4.28 – Testing Practices Requirements).

**VSS-1.4** The system is operable and available to fulfill its safety function when required. (Review Approach items 4 and 10)

### Discussion of Results –

The Hanford Fire Department conducts testing. System restrictions and impairments are tracked and formally reported monthly. Discrepancies are responded to in a timely fashion.

The RPP Fire Protection engineers track system availability for impairments and system restrictions separately. The following availability information is based upon all facilities under the control of the Tank Farm Contractor.

Over the past three years system availability due to impairments has averaged 99.84% (0.16% system downtime). During the last twelve months failures have occurred and the system availability due to impairments averaged 99.97% (0.03% system downtime). The exact numbers of failures, for each individual facility under the cognizance of the TFC, that have occurred during the past three years is unavailable.

During the past three years, the system availability due to system restrictions has averaged 99.70%. During the last twelve months failures have occurred and the system availability due to system restrictions averaged 99.92% (0.08% system restricted). The exact numbers of failures, for each individual facility under the cognizance of the TFC, that have occurred during the past three years is unavailable.

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The Hanford Fire Department performs fire protection system testing, inspection, and maintenance in accordance with National Fire Protection Association (NFPA) Codes. If a system restriction occurs, planned fire watches are instituted.

All facilities are analyzed for compliance with NFPA 80A, "Recommended Practice for Protection of Buildings from Exterior Fire Exposures." This analysis helps assure that fire from the outside of the building will not affect the facility. The gravel and pavement ground cover around the 204-AR building provides a good firebreak from potential range fires. Operations personnel routinely clean up transient combustibles that may accumulate near the structure.

Electric power for fire detection and water for fire suppression are utilities that supply the 204-AR building's fire protection system. In addition, the radio frequency alarm system ties the 204-AR fire alarm panel to the Hanford Fire Department 600 Area Fire Station. The Hanford Fire Department performs constant monitoring of the facility's fire alarm panel status.

**CONCLUSIONS:**

The 204-AR fire protection system is operating as designed. The 204-AR fire protection system is operating reliably as it performs its general service safety function. Normal maintenance activities and response to system problems are performed well, which is evidenced by the high availability of the system. Procedures, design media and policies are in place to maintain configuration control of the system. No outside source of fire could potentially harm the structure or it's contents.

Plans are being developed to replace the fire alarm panel in the 204-AR building (ref. VSS-1.2).

DOE employee who reviewed this assessment DOE Review Team Date 2/28/01  
(\*See below)

Hours required for completing the assessment.

DOE: 40 Hrs.

Contractor: 101 Hrs.

\*Harkins, BA  
Harp, BJ  
Harwood, RG  
Noorani, YG  
Sullivan, RS  
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