

Testimony of Mr. Sean Dunagan
Senior WIPP Recovery Manager
DOE Carlsbad Field Office

Before the
Defense Nuclear Facilities Safety Board
Waste Isolation Pilot Plant Public Hearing
Walter Gerrells Performing Arts & Exhibition Center
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Good afternoon, Vice Chairman. I am Sean Dunagan, Senior WIPP Recovery Manager with the DOE Carlsbad Field Office. Thank you for the opportunity to speak to you today and provide some additional details regarding the progress we have made at the Carlsbad Field Office (CBFO) relative to contractor oversight during recovery phase activities. As the Recovery Manager, one of my responsibilities is ensuring that there is sufficient review, direction and validation of recovery functions, as well as responses to Judgments of Need identified by DOE's Accident Investigation Board (AIB).

DOE is controlling the risk of activities to recover the underground and compensating when needed for safety deficiencies revealed by the February 2014 events and subsequent accident investigations. Immediately following the events at the WIPP site, work activities were curtailed, and underground access was restricted. Limited re-entry into the underground and subsequent limited work activities have been highly scrutinized (on a case-by-case basis) by DOE through the Evaluation of the Safety of the Situation process. DOE will continue to use this activity-based work screening approach until the new Documented Safety Analysis Revision 5 is fully implemented. Through this approach, DOE is able to adequately control the risk of activities.

As a follow up to one of the "Judgments of Need" in the April 2014 AIB report on the underground fire, the CBFO Manager conducted an evaluation of CBFO's organizational structure to identify specific staffing needs related to line management, technical discipline, current oversight functions, and overall performance and effectiveness. As a result of that evaluation, the Manager established the Office of Operations Oversight. The objective was to segregate operations, safety, engineering and environmental oversight for WIPP facility operations from programmatic production activities to enhance oversight independence, particularly through the recovery phase. The newly-established Office of Operations

Oversight is developing and implementing a new contractor oversight program that fully addresses the requirements of DOE Order 226.1B, *Implementation of the Department of Energy Oversight Policy*. The program will ensure that processes for planning, conducting and documenting oversight evaluations of Nuclear Waste Partnership (NWP) programs and activities are developed; issues are evaluated, corrected to prevent recurrence and communicated to management in a timely manner; and CBFO oversight personnel are adequately qualified and trained to perform their oversight function. CBFO has received approval for 22 additional full time equivalent employees, including senior management, senior technical advisors and other positions with nuclear and industrial safety specialties in order to provide additional oversight and the CBFO Manager, the Assistant Managers and Division Directors, will hold personnel accountable for implementation of the oversight program by revising position descriptions for their staff to identify expected oversight functions for the position.

Additional steps the Department is taking to improve oversight include documenting the EM Headquarters Corrective Action Plans and the CBFO Corrective Action Plan. The Headquarters' plans identify 17 actions that will improve oversight and the CBFO plan identifies 25 more actions geared specifically toward improving contractor oversight. Some of these actions include additional oversight of revisions to NWP-administered WIPP emergency response and operations procedures, which define roles for CBFO, NWP and Transportation Tracking and Communication System, and review and approval of NWP procedures for implementing the new Emergency Management Program plans necessary to ensure adequate flow-down of program requirements, including activation, notification, classification and categorization protocols. Additionally, CBFO Fire Protection and Ventilation Safety Systems Oversight will ensure NWP has fully analyzed credible underground fire scenarios through review of the NWP Fire Hazard Analysis, the Baseline Needs Assessment and Emergency Planning Hazard Assessment.

Finally, I believe it is important to note that prior to the resumption of waste emplacement operations the Department will conduct a full Operational Readiness Review. This review will ensure readiness of facility and personnel to re-start the facility within the bounds of acceptable risk defined by the Safety Basis Authorization and ensure the facility has adequate Safety Management Programs implemented and sufficient controls in place to start waste emplacement operations within those bounds.