

REQUEST FOR BOARD ACTION BY A BOARD MEMBER

Requester: Daniel J. Santos July 19, 2018

Brief description of Requested Action:

1. Task the Office of the Technical Director to conduct a focused technical evaluation to further substantiate the information and opinions that were documented by the staff via Staff Issue Report (Hanford Site Plutonium Reclamation Facility Contamination Spread) dated February 25, 2018 and Staff Information Paper (Hanford Site Plutonium Reclamation Facility Contamination Spread) dated May 23, 2018. The Staff Issue Report was provided for Board consideration on May 8, 2018 and the Staff Information Paper was provided to the Board on July 19, 2018. The evaluation shall ensure that any potential safety items can be properly addressed and dispositioned by the Board with sufficient technical information. The evaluation shall include the evidence gathered, independent technical analysis, technical basis, and impact to public health and safety.

At a minimum, the technical evaluation shall address the following statements. These statements are drawn from the following pages of the Staff Issue Report, but are not limited to this document. Both the Staff Issue Report and Staff Information Paper shall be considered in the evaluation.

- Starting at the end of page 4 – **“During discussions with the Board’s staff the RadCon engineers stated that they did communicate their concerns to the management team, but the RadCon engineers believed that management did not share their concerns.”**
- Starting at the end of page 7 – **“Individuals interviewed by the staff provided various reasons for the demolition team’s inability to support timely removal of the rubble. In particular, they noted that the loadout infrastructure was not robust enough to support timely removal of the debris. Additionally, they noted that there were not enough RCTs to support simultaneous demolition and loadout.”**
- On page 8 – **“Although not stated in the interviews, the resident inspector notes, based on discussions during previous in-progress work observations, that demolition receives higher priority than loadout because loadout is less constrained by weather conditions, especially wind.”**
- On page 9 – **“In the opinion of the Board’s staff, these changes to the control set appear to have been taken by CHPRC management without adequate consideration for the potential effect on the adequacy of the contamination control boundaries and the monitoring plan that were established based on the model.**

Furthermore, the project team introduced its own assumptions outside of the model to support its interpretation of use of the model...Consequently, the method was implemented without any changes to the existing written guidance to the work force.”

- On page 15 – **“During an interview with Board’s staff, a DOE-RL facility representative discussed how he and his colleagues had documented their observations in Operational Awareness reports**

throughout the PRF demolition. However, despite communication of the concerns, DOE-RL or CHPRC management did not stop the degradation of controls.”

The technical evaluation shall also address other aspects of the Staff Issue Report and Staff Information Paper that may need rework or additional information, as determined by the Technical Director.

2. Task the Office of the Technical Director to provide the content and results of the evaluation (per item 1 above) in the form of addenda to the Staff Issue Report and Staff Information Paper within 30 business days of approval of this action.

Attachments (init) ____ (included clean version of any proposed document or modified document)

Summarize any time sensitive considerations:

Requestor signature ____signature on file_____ July 19, 2018

Executive secretary ____signature on file_____ July 19, 2018

	APRVD	DISAPRVD	ABSTAIN	NOT PARTICIPATING	COMMENT	DATE
Bruce Hamilton	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
Jessie H. Roberson	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
Daniel J. Santos	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
Joyce L. Connery	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____

Final Disposition Summary

Executive Secretary signature _____ Click here to enter a date.

AFFIRMATION OF BOARD VOTING RECORD

SUBJECT: RFBA by Board Member Santos to Task OTD to Conduct a Technical Evaluation

Doc Control#2018-300-076

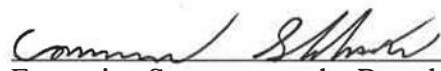
The Board, with Board Member(s) Jessie H. Roberson, Daniel J. Santos *approving*, Board Member(s) Joyce L. Connery *disapproving*, Board Member(s) Bruce Hamilton *abstaining*, and Board Member(s) none *not participating*, has voted to approve the above document on July 25, 2018.

The votes were recorded as:

	APRVD	DISAPRVD	ABSTAIN	NOT PARTICIPATING*	COMMENT	DATE
Bruce Hamilton	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	07/24/18
Jessie H. Roberson	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	07/24/18
Daniel J. Santos	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	07/24/18
Joyce L. Connery	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	07/25/18

*Reason for Not Participating:

This Record contains a summary of voting on this matter together with the individual vote sheets, views and comments of the Board Members.


Executive Secretary to the Board

Attachments:

1. Voting Summary
2. Board Member Vote Sheets

cc: Board Members
OGC
OGM Records Officer
OTD

DEFENSE NUCLEAR FACILITIES SAFETY BOARD
NOTATIONAL VOTE RESPONSE SHEET

FROM: Bruce Hamilton

**SUBJECT: RFBA by Board Member Santos to Task OTD to Conduct a Technical
Evaluation**

Doc Control#2018-300-076

Approved _____ **Disapproved** _____ **Abstain** **X** _____

Recusal – Not Participating _____

COMMENTS: Below **X** **Attached** _____ **None** _____

The value proposition of this proposed technical evaluation being ambiguous, I defer to the wisdom and preferences of my fellow Board Members.

I therefore abstain.


Bruce Hamilton

24 JULY 2018
Date

DEFENSE NUCLEAR FACILITIES SAFETY BOARD
NOTATIONAL VOTE RESPONSE SHEET


FROM: Jessie H. Roberson

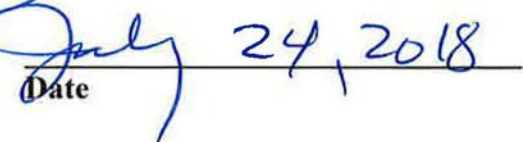
SUBJECT: RFBA by Board Member Santos to Task OTD to Conduct a Technical
Evaluation

Doc Control#2018-300-076

Approved **Disapproved** **Abstain**
Recusal – Not Participating

COMMENTS: **Below** **Attached** **None**



Jessie H. Roberson


Date

DEFENSE NUCLEAR FACILITIES SAFETY BOARD
NOTATIONAL VOTE RESPONSE SHEET


FROM: Daniel J. Santos

**SUBJECT: RFBA by Board Member Santos to Task OTD to Conduct a Technical
Evaluation**

Doc Control#2018-300-076

Approved X Disapproved _____ Abstain _____
Recusal – Not Participating _____

COMMENTS: Below _____ Attached _____ None X



Daniel J. Santos
7/24/18

Date

DEFENSE NUCLEAR FACILITIES SAFETY BOARD
NOTATIONAL VOTE RESPONSE SHEET

FROM: Joyce L. Connery

SUBJECT: RFBA by Board Member Santos to Task OTD to Conduct a Technical
Evaluation

Doc Control#2018-300-076

Approved _____ Disapproved X Abstain _____

Recusal – Not Participating _____

COMMENTS: Below X Attached _____ None _____

Most of these statements are observations that captured the situation on the ground at time. I don't believe that further evaluation would produce any additional information that would be helpful to the Board in carrying out its statutory mission. It would be more useful to write a letter outlining the Agencies conclusions regarding the action and decisions that led to the contamination events and to advise the Department to ensure that during the resumption of activities the same behavior and decision patterns are not repeated.



Joyce L. Connery

July 25, 2018
Date

Member voted by e-mail dated July 25, 2018