

## DEFENSE NUCLEAR FACILITIES SAFETY BOARD

March 27, 2020

**TO:** Christopher J. Roscetti, Technical Director  
**FROM:** Matthew Duncan and Brandon Weathers, Resident Inspectors  
**SUBJECT:** Oak Ridge Activity Report for Week Ending March 27, 2020

**DNFSB Staff Activity:** DNFSB staff had teleconferences with contractor and federal personnel from the Oak Ridge Office of Environmental Management and NPO to discuss implementation of the 10-year seismic hazard assessment required by DOE Standard 1020-2016, *Natural Phenomena Hazards and Design Criteria for DOE Facilities*.

**COVID-19:** On Monday, CNS reported that one of its employees at Y-12 had laboratory-confirmed COVID-19. The employee is reportedly in isolation at home and other employees potentially in contact were asked to “self-quarantine.” The work areas were sanitized.

There have been no major changes in operating status due to COVID-19 for Y-12 or Oak Ridge Office of Environmental Management facilities since last week (see 3/20/20 report). The sites continue to take preventive actions related to COVID-19. For example, Y-12 plans to allow the use of handheld radiation detectors when exiting radiological work areas rather than stepping into personnel contamination monitors which require close contact with the monitor. CNS expanded telework eligibility to a greater portion of the workforce this week. Nearly all federal staff at both site offices are teleworking and limiting time on site to essential work activities.

**Nuclear Criticality Safety:** NPO transmitted a letter to CNS rejecting the closure of a NPO finding from a 2018 shadow assessment of unexpected uranium accumulation events at Y-12 (see 1/4/19 report). The finding related to CNS reporting one of the uranium accumulation discoveries under an occurrence reporting criteria that is lower than what should have been applied. In response to the 2018 finding, CNS revised the Y-12 procedure on occurrence notification and reporting. However, NPO determined that the site-specific guidance on reporting criteria for nuclear criticality safety control violations in the revised procedure is not compliant with DOE Order 232.2A, *Occurrence Reporting and Processing of Operations Information*. The area of noncompliance stems from CNS site-specific guidance having a broad interpretation of documented controls with respect to nuclear criticality safety occurrence reporting criteria (see 10/25/19 report). The CNS definition of documented controls includes requirements, features, and characteristics that are not formally documented in a criticality safety evaluation. If these “documented controls” are not formally documented in an effective criticality safety evaluation, they cannot be used as justification for exclusion from the nuclear criticality safety occurrence reporting criteria. NPO’s rejection of the finding requires CNS to submit a new corrective action plan to address the issue within 30 days.

**Federal Oversight of Nuclear Criticality Safety:** Last Friday, an NPO employee was formally recognized as having successfully completed all of the requirements of the technical qualification program for criticality safety per DOE Standard 1173-2009.