DEFENSE NUCLEAR FACILITIES SAFETY BOARD

April 3, 2020

MEMORANDUM FOR: Christopher J. Roscetti, Technical Director

FROM: J.W. Plaue and D. Gutowski, Resident Inspectors

SUBJECT: Los Alamos Activity Report for Week Ending April 3, 2020

COVID-19 Impacts: The laboratory's operational posture remains similar to the end of last week (see 3/27/2020 report). Developments this week include:

- On Tuesday, the NNSA Field Office approved Triad's request for a 90-day extension for training required by DOE Order 426.2, *Personnel Selection, Training, Qualification, and Certification for DOE Nuclear Facilities*, because of social distancing impacts on the ability to conduct required courses.
- The NNSA Field Office is coordinating with DOE Headquarters on the need for other regulatory relief.
- Triad generated and distributed a video tailored towards craft workers discussing COVID-19 transmission, occupational risks, and best practices to minimize fomite spread and infection.
- On Thursday, Triad completed a shipment of waste to the Waste Isolation Pilot Plant.

Federal Oversight: In 2018, the NNSA and EM Field Offices both revised their processes for line management oversight and independent assessment activities of their contractors. Both offices experienced challenges implementing these processes in fiscal year 2019 and are working on improvements. For example, the EM Field Office completed 1 out of about 7 planned assessments of N3B functions related to safety at the nuclear facilities. Similarly, the NNSA Field Office completed 1 out of about 6 planned assessments of Triad functions related to safety at the nuclear facilities—the balance were either cancelled or delayed into this fiscal year. Notably, overall execution varied substantially between organizations. For example, the Quality Assurance organization completed 10 of 13 planned independent assessments mainly related to product acceptance, while the Field Operations organization did not complete any of its 3 planned independent assessments—2 were cancelled and one was actually executed as a shadow assessment.

Both offices were also challenged with their line management oversight. The data for the NNSA Field Office indicate that 20 people identified issues out of a staff of about 85; however, just 6 people were responsible for about 75 percent of the entries in the formal issues management system. Further review indicates that most issues have been dispositioned in a manner directed by senior management (typically email or verbal), rather than capturing in a contracting letter requesting formal resolution. While procedure allows this process for low risk issues, the lack of formality increases the difficulty for tracking, trending, and effectiveness reviews. Until recently, the EM Field Office had not been maintaining the results of its line management oversight in a systematic manner (see 3/6/2020 report). As a result, the resident inspectors cannot find credible data from last year to assess their federal oversight.

Last month, the NNSA Field Office completed an independent assessment of their Integrated Safety Management program and their oversight of the contractor's program. Notable results include: a finding that field office procedures have been chronically out-of-date and not reviewed per requirements; an observation that the field office has not completed a staffing evaluation; and a noteworthy practice regarding the effectiveness of the laboratory's Integrated Safety Management System Steering Committee.