

DEFENSE NUCLEAR FACILITIES SAFETY BOARD

December 4, 2020

TO: Christopher J. Roscetti, Technical Director
FROM: Alexander Velazquez-Lozada, Cognizant Engineer
SUBJECT: Waste Isolation Pilot Plant (WIPP) Report for November 2020

DNFSB Staff Activity: There were no Board's staff visits to WIPP this month. The staff participated in regular conference calls to maintain cognizant of site activities.

COVID-19 Response. WIPP continues to monitor staffing levels and meet the minimum requirements to continue operations. Carlsbad Field Office (CBFO) continues to have most of its staff teleworking. WIPP continues processing and downloading waste at reduced rates. Recent spikes in COVID-19 cases have impacted operations and maintenance. The rate of receipt of shipments has been reduced to 2 shipments per week until the end of the calendar year.

Nuclear Safety. Based on the quality and content of recent interactions with the Board's staff, DOE Headquarters, and CBFO, Nuclear Waste Partnership, LLC (NWP), conducted a detailed assessment of its Nuclear Safety Program using corporate resources. NWP identified opportunities to improve in the areas of hazard analysis and controls, safety basis documentation, unreviewed safety questions, the Training & Qualification Program, the Nuclear Criticality Safety Program, procedure implementation, and day-to-day nuclear safety-related activities. NWP then developed and prioritized corrective actions in a 2 year plan. NWP plans to perform periodic independent assessments to ensure the success of ongoing improvements and the sustainability of changes made to the Nuclear Safety Program.

Conduct of Operations. This month, NWP reported that a battery exhaust filter train was left running overnight in late October in anticipation of resuming tests in the morning. At the time, the fan was operating under a limiting condition for operation (LCO) for testing, and did not meet the Technical Safety Requirements (TSR) for operability. Unrelated circumstances the next morning precluded additional tests. The Facility Shift Manager (FSM) subsequently entered Waste Handling Mode without knowing that the operating battery exhaust filter train did not meet the TSR. Upon discovery, the FSM swapped to the other filter train, which met TSR operability requirements. Initially the FSM and Nuclear Safety personnel determined that a TSR violation had occurred. After further review and discussions, NWP determined that the event was not a TSR violation because the LCO allows testing of inoperable equipment while in Waste Handling Mode. NWP identified the need to review current processes to find similar disconnects between TSRs and operational processes and revise the processes to provide better guidance to operators to successfully complete such processes as prescribed.

Utility Shaft Project. NWP issued a stop work order for a subcontractor working on the Utility Shaft Project after a hoisting and rigging incident during a lift involving a ventilation plenum segment. A fact finding identified multiple problems, including the lack of detail in the lift plan and associated drawings. In a separate development, the New Mexico Environment Department (NMED) denied a WIPP request for reissuance of the Temporary Authorization (TA) under which the project is currently proceeding. Surface preparatory work and shaft stabilization may continue, but no further excavation is allowed until NMED approves a TA/Permit Modification.