

## DEFENSE NUCLEAR FACILITIES SAFETY BOARD

September 10, 2021

**TO:** Christopher J. Roscetti, Technical Director  
**FROM:** B. Caleca, P. Fox, and P. Meyer, Hanford Resident Inspectors  
**SUBJECT:** Hanford Activity Report for the Week Ending September 10, 2021

**Central Waste Complex:** DOE previously directed the central plateau cleanup (CPC) contractor to declare a potential inadequacy in the safety analysis with a positive unreviewed safety question determination (USQD) because of their inability to visually inspect some safety significant containers. The containers are in an outside storage area and are wrapped in protective coverings or are otherwise covered precluding visual inspection. The inspections are required by a technical safety requirement surveillance. The contractor's subsequent USQD found that the inability to perform the inspection implicitly reduced the margin of safety in the safety basis. The CPC contractor also declared a technical safety requirement (TSR) violation because of their inability to adequately perform the surveillance requirement. As a result of the conditions, the CPC contractor declared 74 waste containers inoperable (see 07/23/2021 report). The contractor has completed their evaluation of the safety of the situation (ESS) and submitted it to DOE for approval. Their evaluation analyzed the unmitigated dose consequences specific to the outdoor storage containers without crediting container integrity. The analysis determined that the consequences remain bounded by the consequence analysis that supports operation of the facility under a previous ESS. Consequently, they recommend the removal of related TSR and design feature applicability to those containers. To protect the assumptions and initial conditions in their analysis, they included a control in an associated justification for continued operation for the 74 inoperable containers that prohibits the introduction of additional material at risk into the outside storage area. The control will remain in place until DOE approves its removal.

**Waste Treatment Plant (WTP):** A resident inspector observed a training activity on use of the Out-of-Scope Documents and Facilities (OSDF) report. The OSDF report identifies documents, document types, and facilities that do not have the ability to affect design, processes, procedures, or tests that impact the Documented Safety Analysis. Changes to documents and facilities identified in the OSDF report do not invoke the unreviewed safety question process, however, may impact worker safety. The training was thorough, well-organized, and clearly presented, with practical examples and participant engagement.

**Tank Farms:** A resident inspector observed the performance of an ALARA review where attendees discussed the removal of a glove bag that had been installed on a tank riser to support the collection of a grab sample. The glove bag was torn during the removal process but, because of appropriate worker actions, did not result in a contamination spread. The radiological planner that led the discussion ensured relevant details were addressed and attendees actively participated in the discussion. They identified several proposed actions to preclude similar future events.

DOE-ORP personnel conducted the final oral examination of a Facility Representative (FR) candidate who will be assigned to oversee tank farm activities. The examination is the last step in the FR's qualification training, and focuses on knowledge of operations and safety systems, their roles and responsibilities, and the application of DOE directives to onsite work. The board voted to pass the candidate.