

DEFENSE NUCLEAR FACILITIES SAFETY BOARD

November 26, 2021

TO: Christopher J. Roscetti, Technical Director
FROM: L. Lin and Z. C. McCabe, Resident Inspectors
SUBJECT: Savannah River Site Activity Report for Week Ending November 26, 2021

Salt Waste Processing Facility (SWPF): Typically, the Air Dilution System rounds are completed once per shift (twice daily). Last Friday, in addition to the typical performance, the day shift completed them an additional time as part of the efforts to implement a revision to the Technical Safety Requirements (TSRs). They entered the appropriate Limiting Condition for Operation (LCO), completed their rounds, and exited the LCO. During the evening shift, the shift operations manager (SOM) was reviewing rounds completed that shift when they noticed that one of the flow rates recorded during the day shift was out of range, but not circled in red ink. Since neither the operator that recorded the rounds on the day shift nor the SOM that reviewed the rounds noticed the recorded flow rate was out of range, they exited the LCO while they did not meet operability requirements. The SOM on the day shift signed the completed rounds procedure twice: once as a reviewer and once as the SOM reviewing the TSR related items. The shift technical engineer (STE) does not typically review these rounds sheets. Based on discussions during a fact-finding meeting, SWPF management do not believe that the additional performance of rounds contributed to the errors.

SWPF personnel held a fact-finding meeting for the TSR violation regarding the Air Dilution System LCO (see 11/19/21 report). SWPF personnel have identified the surveillance procedures as inadequate and as a contributor to the violation. Additionally, SWPF personnel were able to produce the electronic LCO tracking database record from July that shows that condition E.1 had been completed shortly before they should have entered condition E for surveillance 4.3.1.8. However, performing this action at that time would not have been possible as it requires ensuring a minimum flow rate to the solvent drain tank. The applicable rotameters would have read zero at that time because the plant air system had been valved out as part of the evolution. SWPF personnel believe this was logged in this manner because the database does not allow you to mark an LCO required action as not applicable.

SWPF has entered a "TSR Compliance focus period" this week due to the recent events (see above and 11/19/21 reports). Work is mainly restricted to those that are necessary for life safety, required surveillances, and low risk work released with manager approval. All TSR rounds and surveillances are to be reviewed by the duty manager and then the SOM. All operations personnel will receive conduct of operations refresher training.