

DEFENSE NUCLEAR FACILITIES SAFETY BOARD

February 2, 2007

MEMORANDUM FOR: J. Kent Fortenberry, Technical Director
FROM: B. Broderick and C. H. Keilers, Jr.
SUBJECT: Los Alamos Report for Week Ending February 2, 2007

Keilers was off-site this week.

Contaminated Injury Investigation: A laboratory sponsored Type B-like investigation into two recent contaminated wound incidents began this week (site rep weeklies 1/19/07, 1/12/07). The Associate Director for Nuclear and High Hazard Operations is leading the eight-person investigation team that includes four participants from LANS corporate parent organizations, including Washington Group International and BWX Technologies. During the initial interview phase, the team is split, with one half investigating the Chemistry and Metallurgy Research Facility event and the other half, the Plutonium Facility event. A draft report and findings are scheduled to be presented to lab management on 2/23/07.

Formality of Operations: The conduct of operations, engineering, and maintenance components of the Formality of Operations project have moved from the development to execution phase. Last week, LANL management approved implementation plans designed to close gaps between the new institutional manuals and the existing policies and procedures. Facility Operations Directors (FOD) are now responsible for executing these plans, which should serve to standardize and improve performance lab-wide. Progress will be assessed quarterly and tied to contractual performance based incentives. Conduct of training is the fourth element of the Formality of Operations initiative and is critical for enabling and sustaining success in the other areas. The training manual was issued this week, and FODs will perform gap analyses and revise implementation plans accordingly.

The need for timely, effective implementation of Formality of Operations is underscored by the events that prompted the investigation discussed above and warrants continued close management attention.

Transuranic (TRU) Waste Operations: The Chief of Defense Nuclear Safety (CDNS) was on-site this week to finalize the Project Management Plan for dispositioning 229 high-activity transuranic waste drums stored above ground at Area G (site rep weeklies 1/12/07, 12/15/06, 12/8/06). The plan targets approval to begin repackaging high-activity drums in the Waste Characterization, Reduction, and Repackaging (WCRR) facility on Apr 30th; the short (3-month) WCRR preparation phase drives the need for an exemption-based safety basis and readiness review strategy. To meet the Apr 30th target date, LANL is revising the existing draft safety basis for WCRR, with input from LASO and CDNS, and plans to reissue it later this month. The Project Management Plan assumes that a safety evaluation report approving the safety basis cannot be prepared in this period, so an exemption to the DOE readiness review order (O 425.1C) will be proposed. A LANL Readiness Assessment and NNSA Operational Readiness Review are then planned for April; assuming readiness is demonstrated, an exemption to the Nuclear Safety Management rule (10CFR830) will also be proposed to allow startup of Hazard Category 2 nuclear facility operations without an approved rule-compliant safety basis. NNSA HQ (NA-10) will serve as the Authorizing Authority for the exemption requests and facility startup.

The Project Management Plan's scope excludes 5 above-ground drums with activity greater than 300 PE-Ci that contain combustible debris and 60 sludge drums that cannot currently be processed in WCRR. These drums will be addressed in a later campaign to disposition underground high-activity waste.