

## DEFENSE NUCLEAR FACILITIES SAFETY BOARD

March 2, 2007

**MEMORANDUM FOR:** J. K. Fortenberry, Technical Director  
**FROM:** M. J. Merritt, DNFSB Site Representative  
**SUBJECT:** Lawrence Livermore National Laboratory (LLNL)  
Report for Week Ending March 2, 2007

**Readiness Assessment for Legacy Item Disposition:** LLNL has declared readiness to proceed with disposition of a legacy item referred to as Object-77. The disposition activity will be conducted in the Plutonium Facility. LLNL has notified the Livermore Site Office (LSO) that the four pre-start findings identified by the contractor readiness assessment (RA) have been closed. The specific pre-start findings were:

- the emergency response plan for the activity was not fully implemented;
- the containment tent to be constructed at the entrance to the laboratory room would interfere with facility fire protection system equipment;
- NOMEX fire hoods for fissile material handlers were not yet available; and
- issues resulting from the facility's management self-assessment were not formally documented and closed.

LSO line management has independently verified the pre-start findings are closed with the clarification that some elements of the emergency plan cannot be fully implemented until just prior to the activity (e.g., construction of a containment tent in a corridor of the facility). Based on the notifications by LLNL and LSO line management, the LSO Manager has directed the commencement of the LSO RA. The LSO RA is scheduled for next week.

**LLNL Nuclear Facilities Documented Safety Analyses (DSAs):** LLNL has developed a path forward to update the DSAs for nuclear facilities to be consistent with the current methodologies defined in DOE-STD-3009, *Preparation Guide for U.S. DOE Nonreactor Nuclear Facility Safety Analysis Reports*, Change Notice 3 (CN03). The implementation of the methodologies in CN03 will likely result in improved derivation of specific administrative controls (SACs) with specification of safety functions, functional requirements, and associated evaluations. The SACs will be re-evaluated to ensure appropriate designation considering supplemental administrative controls identified in safety management programs. The previous revision, DOE-STD-3009, Change Notice 2 (CN02), has been incorporated into the DSAs for all nuclear facilities at LLNL with the exception of the Plutonium Facility and the Radiography Facility. CN02 invoked more conservative requirements for worker protection. Unfortunately, implementation of CN02 in the Plutonium Facility was linked to the first annual update of the DSA that was expected in April 2007 based on approval of the DSA by LSO in April 2006. However, the first annual update may be further delayed until April 2008 (see weekly report dated February 16, 2007).

At this point, firm schedules for implementation of CN03 have not been established since the annual updates most facility DSAs are in the review and approval process and implementation of CN03 will be part of the subsequent annual updates. As for the Plutonium Facility, if the schedule exemption is granted, CN02 and CN03 will both be incorporated in the April 2008 annual update.