

## DEFENSE NUCLEAR FACILITIES SAFETY BOARD

June 6, 2008

TO: J. Kent Fortenberry, Technical Director  
FROM: Donald Owen and David Kupferer, Oak Ridge Site Representatives  
SUBJECT: Activity Report for Week Ending June 6, 2008

**Oxide Conversion Facility (OCF) Restart:** The site rep. observed restart of operations in OCF this week. The uranium tetrafluoride product is being analyzed. This restart is a significant milestone for Y-12. This restart follows about 20 months of shutdown that included investigation of a small release of hydrogen fluoride in October 2006, implementation of new engineered and administrative safety controls, completion of readiness reviews, and resolution of funding issues. B&W is authorized to operate OCF until September, but funding of OCF operations in Fiscal Year 2009 remains under review.

**Unreviewed Safety Question (USQ) Process:** As part of the Y-12 Throughput Improvement Program, B&W has started an initiative to revise the Y-12 USQ procedure. The intent is to revise the USQ screening criteria on proposed changes to reduce the amount of full USQ Determinations (USQDs) completed by safety basis personnel. B&W personnel noted to the site reps. that about 1000 or more USQDs have been completed each year resulting in three or less positive USQs per year. The primary change is addition of a screening option involving a designated expert review and decision. YSO and NNSA Headquarters review is in progress.

**Conduct of Operations:** Approximately three months ago, B&W completed a safety basis calculation that increased the bounding quantity of hazardous materials assumed in certain weapon components. B&W subsequently declared a positive USQ. In response, the B&W Production Facilities Department issued a Standing Order that placed various restrictions on transferring these components between Y-12 nuclear facilities. Per requirements in the Y-12 Conduct of Operations Manual, B&W specified that the Standing Order would expire within 30 days. B&W proceeded to re-issue and archive this Standing Order to attempt to remain compliant with the 30-day requirement. On two occasions, the Standing Order was allowed to expire days prior to the "new" Standing Order being issued (a 5-day gap in late April and a 14-day gap during the past few weeks). The Y-12 Conduct of Operations Manual also states that permanent implementing documents shall be in place within 30 days of the effective date of any Standing Order that implements a safety basis requirement. B&W has submitted a Justification for Continued Operations to YSO that states that the Standing Order will remain in place until the applicable safety basis documents (including technical safety requirements) are revised, approved, and implemented. It is unclear why the implementing procedures haven't yet been revised to include the specific requirements in the Standing Order (i.e., why the permanent implementing documents haven't been updated).

B&W has also formally reported that some of the revisions to the Standing Order were not distributed appropriately. Based on this experience, the site reps. believe that a broader evaluation may be warranted to determine whether Standing Orders are being properly generated, distributed, tracked and incorporated into procedures per the requirements of the Y-12 Conduct of Operations Manual.

**YSO Safety Systems Oversight:** The YSO Manager announced selection of a new lead engineer for safety system oversight, replacing the prior lead engineer who retired in December.