

DEFENSE NUCLEAR FACILITIES SAFETY BOARD

February 25, 2005

MEMORANDUM FOR: J. K. Fortenberry, Technical Director
FROM: Michael J. Merritt, DNFSB Site Representative
SUBJECT: Lawrence Livermore National Laboratory
Report for Week Ending February 25, 2005

Plutonium Facility Operating Status: LLNL has requested Livermore Site Office (LSO) approval to resume limited programmatic activities (see weekly report dated February 18, 2005). At this time, the stand-down of programmatic activities remains in effect and LSO continues to approve specific work on a case-by-case basis.

The LLNL proposal for resumption of limited programmatic activities, dated February 9, 2005, contains a set of compensatory measures that are intended to compensate for safety deficiencies identified in an independent oversight report (see weekly report dated January 14, 2005). In general, the compensatory measures are related to either specific findings or to violations of Administrative Control Programs (ACPs) required by the facility Technical Safety Requirements (TSRs). Also included in the proposal are commitments for a future recovery plan, an assessment, and a report as follows:

- A recovery plan for each TSR-level program violation due by February 22, 2005;
- Comprehensive assessments of the configuration management of vital safety systems beginning March 15, 2005; and
- An independent review of ACPs not specifically addressed in the plan with a report provided to LSO by March 31, 2005.

In a February 16, 2005, letter LLNL indicated that the recovery plans for violations of TSR-level programs will be delayed until March 11, 2005. The delay is attributed to the complexity of the plans and the need to integrate resolution of these issues into an overall corrective action plan.

LSO conditionally approved the compensatory measures subject to certain additions and clarifications. In a letter dated February 18, 2005, LSO approved LLNL's compensatory measures with the conditions that LLNL needs to provide:

- An ALARA review for material control and accountability operations as part of immediate compensatory measures;
- A technical basis defining the safety improvement associated with the reduction of material at risk;
- The basis for risk description bins; and
- A technical analysis showing that the differential pressure between the corridors and outside is adequate during high wind conditions.

The LSO letter also states that approval of the compensatory measures does not constitute approval to proceed with the activities contained in the LLNL proposal. LSO will first review the technical justification for the reduced material at risk and verify that the compensatory measures have been implemented as described by LLNL. When this verification process is complete, LSO plans to issue authorization to proceed.

At this point, it is not clear that a deliberate process for assessing the adequacy and implementation of compensatory measures has been established. Additionally, there are no plans to confirm the readiness to conduct the operations being proposed.