

## DEFENSE NUCLEAR FACILITIES SAFETY BOARD

July 2, 2003

**TO:** J. Kent Fortenberry, Technical Director  
**FROM:** Donald Owen, Oak Ridge Site Representative  
**SUBJ:** Activity Report for Week Ending July 4, 2003

The site rep. will be out of the office on Thursday and Friday.

A. Bechtel Jacobs Company (BJC) Integrated Safety Management (ISM) System. The Board's letter of October 15, 2001 noted the failure to correct numerous deficient conditions cited in DOE Oak Ridge Operations Office (ORO) ISM reviews. The Board's letter also noted that the long-standing failure to apply nuclear safety requirements indicated that the ISM Systems for DOE-ORO and BJC were not functioning, especially in the area of feedback and improvement. As part of the response to this letter, a re-verification of the BJC ISM System was undertaken and completed in June. This reverification effort included review of the revised ISM System Description documentation and review of ISM implementation in the operations performed by BJC and its subcontractors. This week, the staff and site rep. discussed the re-verification effort with DOE-ORO, BJC and ISM re-verification team personnel. The ISM re-verification team found no major system deficiencies, identified some opportunities for improvement and noted a major positive shift in ISM implementation by BJC. Based on the results of the ISM re-verification, DOE-ORO approved the BJC ISM System Description late last week.

Among the uncorrected deficient conditions that had been noted in the Board's October 2001 letter was adherence to authorization bases (ABs). DOE-ORO and BJC personnel informed the staff and site rep. that, in response to the Board's letter, the BJC ISM System now requires that implementation of new or revised AB controls be independently validated after line management implementation efforts. This process is termed the Implementation Validation Review (IVR) and is patterned after the IVR process developed at Rocky Flats several years ago following AB implementation problems. (1-C)

B. Y-12 Activity-Level Work Planning. As reported on June 20<sup>th</sup>, the site rep. had provided observations to YSO and BWXT management concerning the work planning for a maintenance evolution on a 150-ton hydraulic press in Building 9212. No job hazard analysis had been required as all screening questions had been answered in the negative. The site rep. considered that a high hazard level threshold is established by the screening questions below which no job hazard analysis is required for an activity being planned. Such lack of hazard analysis could result in lack of proper definition of work scope and/or lack of identification of safety controls, particularly engineered controls, for hazardous jobs at Y-12. This week, YSO management informed the site rep. that improvement actions on this issue are warranted and indicated that specific actions will be defined during the next few weeks. (1-C)

cc  
Board Members