

## DEFENSE NUCLEAR FACILITIES SAFETY BOARD

August 20, 2004

**TO:** J. Kent Fortenberry, Technical Director  
**FROM:** R. Todd Davis/Donald Owen, Oak Ridge Site Representatives  
**SUBJ:** Activity Report for Week Ending August 20, 2004

A. Authorization Basis Implementation Validation Review. This week, BWXT conducted an Implementation Validation Review (IVR) of Authorization Basis requirements in a nuclear facility. This particular facility is planned to be the first Hazard Category 2 nuclear facility at Y-12 to implement a 10 CFR 830 compliant Documented Safety Analysis (DSA). The IVR process was developed by BWXT as part of actions briefed to the Board in July 2003 to ensure safety basis controls are properly implemented. The review team observed facility performance of surveillances, performed interviews and inspections, and reviewed implementing documents. Three pre-implementation findings were identified by the team: appropriate treatment of out-of-service systems; procedural requirements for seismic evaluation of new equipment; and failure to perform a surveillance because of procedure problems. Two post-implementation findings were identified: training on safety basis requirements related to inventory control and updating the computer based training for safety basis controls.

After facility personnel resolve the three pre-implementation findings, BWXT will declare that the DSA is implemented and revise the safety basis list accordingly. YSO is still developing their protocols for reviewing DSA implementation.

B. Oxide Conversion Facility. On Friday, the line management Performance Self-Assessment (PSA) team briefed Y-12 management on their review of Oxide Conversion Facility readiness efforts. The most significant issue identified is that the equipment and procedures are not yet ready to support OCF startup. The PSA review of facility operations was interrupted several times because of equipment failure or procedure problems. PSA team observation of facility activities was also limited by OCF staffing that is at minimum level. Activities were postponed on several occasions because of inadequate staff (i.e., personnel were absent). BWXT plans to increase the OCF staffing level and may include an additional shift to support processing; however, it is not clear when that will happen and whether operator training will be complete prior to the contractor or DOE Operational Readiness Reviews. The PSA team also noted that the facility personnel should begin performing operations in a manner consistent with actual radiological operations (e.g., appropriate use of personnel protective equipment). As noted last week, BWXT has yet to perform an integrated run at OCF that meets BWXT expectations for readiness demonstration. As a result, the site reps. believe that it may be premature to conclude the PSA.

C. Corporate Integrated Safety Management System Review. The BWXT assessment team completed their review of the Y-12 Integrated Safety Management System (ISMS) this week. The team noted significant progress in several areas (e.g., configuration management and safety performance); however, several areas were identified as needing management attention. In particular, the team identified that the Automated Job Hazard Analysis process did not appear to be consistently identifying hazards and the proper controls. In addition, the team found that certain operations personnel have not been adequately trained on the implementation of safety basis requirements.

D. Highly Enriched Uranium Materials Facility (HEUMF). As reported on June 18<sup>th</sup>, the HEUMF Preliminary Documented Safety Analysis (PDSA) was under review by YSO. This week, YSO approved the PDSA and provided the YSO Safety Evaluation Report (SER) to BWXT. The SER notes that efforts are planned to attempt to reduce the risk of an industrial lift truck fire in vaults.