

## DEFENSE NUCLEAR FACILITIES SAFETY BOARD

February 14, 2002

**TO:** J. K. Fortenberry, Technical Director  
**FROM:** D. F. Owen, RFETS Site Representative  
**SUBJECT:** RFETS Activity Report for the Week Ending February 15, 2002

The site rep. will be out of the office on Friday, February 15<sup>th</sup>.

**Control of Subcontractors and Other Outside Organizations.** An increasing amount of decommissioning work will be performed by subcontractors, site support service personnel and other personnel not directly attached to the major defense nuclear facilities/projects run by Kaiser-Hill. Since September 2001, there have been several instances of inadequate control of such outside personnel resulting in various occurrences. Examples of such occurrences include a failure to apply lock-out/tag-out in Building 776, an unauthorized chemical gas release in Building 776, an unauthorized de-energizing of glovebox pressure gages in Building 707, and an unauthorized draining of a tank in Building 774. As noted in site rep. reports of October 19<sup>th</sup> and December 7<sup>th</sup>, Kaiser-Hill had been determining actions to improve the major projects' control of outside organizations.

This week, the site rep. was provided a Kaiser-Hill plan listing actions towards improving control of sub-contractors and other outside personnel. Some actions are complete and some are in progress. The actions are largely focused on facility shift management knowledge of the subcontractor work being performed. The actions in the plan, however, do not clearly address aspects regarding proper flow-down of safety requirements and work planning/control processes nor strengthening on-the-floor oversight of outside organization work by Kaiser-Hill. The site rep. discussed this observation with DOE-RFFO and Kaiser-Hill management. (1-C)

**Work Planning/Conduct of Operations.** During an operation to replace a small in-line filter in a nitrogen supply line to a glovebox in Building 371, contamination was spread upon removing the filter cap. The work crew were not in respiratory protection nor controlling the immediate area as a radiological Contamination Area as required by the radiological work permit specific to this job. Fortunately, no radiological uptakes are expected. Follow-up review by Building 371 management revealed that the respiratory protection and Contamination Area designation for this operation were not identified as specific radiological hazard controls in the Job Hazard Analysis (JHA) as required by RFETS work planning requirements; the JHA merely referenced the radiological work permit. These controls were not incorporated into the work instructions for the operation as also called for by RFETS work planning requirements. The work crew did not understand the need for these controls and these controls were not discussed as part of the pre-evolutionary brief. Corrective actions were under development as of this report.

cc: Board Members