

DEFENSE NUCLEAR FACILITIES SAFETY BOARD

December 20, 2002

TO: J. K. Fortenberry, Technical Director
FROM: D. F. Owen, RFETS Site Representative
SUBJECT: RFETS Activity Report for the Week Ending December 20, 2002

Recommendations 94-1/2000-1. As reported on November 1st, DOE-RFFO had proposed a change to the DOE Implementation Plan for Recommendations 94-1/2000-1 to include a new milestone for repackaging approximately 970 kg of low-purity plutonium oxides to meet the Interim Safe Storage Criteria (ISSC) by July 2003. The DOE Office of Environmental Management subsequently directed DOE-RFFO to proceed with processing of these oxides (November 22nd site rep. report). This week, Kaiser-Hill started operations to blend-down and repackage these oxides into pipe overpack components to meet the ISSC. (3-A)

Annual Integrated Safety Management (ISM) Assessment. DOE-RFFO issued the report of their Annual ISM Assessment to Kaiser-Hill. The Assessment team concluded that there has been improvement in Kaiser-Hill's ISM System since the 2001 Annual ISM Assessment but identified findings and opportunities for improvement on issues including:

- the need to clarify ISM System assignments among the DOE-RFFO staff;
- the need to ensure that on-the-floor "pen and ink" changes to procedures receive appropriate technical review;
- the need to improve on-the-floor sign-offs and tracking of completed work in work package documentation;
- the need to improve the identification and dissemination of lessons-learned from post job reviews of completed work activities; and
- the need to maximize the conduct of work by workers involved in the activities' work planning.

Action plans addressing the above issues were requested by the DOE-RFFO Manager. (1-C)

Nuclear Material Handling & Control/Nuclear Safety Screening. As reported last week, DOE-STD-3013 containers with weld and/or moisture measurement failures were not being stored in vaults in 10-gallon drums as assumed by the safety analysis; the containers were on 2-position carts which do not have secured lids. The nuclear safety discovery documentation identifying this issue noted that at the time of the Building 371 Basis for Interim Operation (BIO) change covering handling and control of DOE-STD-3013 containers there was no alternative to use of the 10-gallon drums in vaults. Therefore, the assumption had not been translated into an administrative control requirement in the BIO.

The nuclear safety discovery documentation did not address what subsequent nuclear safety screening, if any, had been performed for use of 2-position carts for DOE-STD-3013 containers in the vaults. The site rep. inquired with DOE-RFFO management on this issue. DOE-RFFO subsequently informed the site rep. that no nuclear safety screening for the use of 2-position carts had been performed, contrary to site requirements. A criticality safety review had been performed but did not identify the conflict with the BIO. DOE-RFFO management indicated to the site rep. that they would raise this issue with Kaiser-Hill management. (1-C)