

DEFENSE NUCLEAR FACILITIES SAFETY BOARD

February 23, 2001

TO: J. Kent Fortenberry, Technical Director
FROM: Paul F. Gubanc and David T. Moyle, Oak Ridge Site Representatives
SUBJ: Activity Report for Week Ending February 23, 2001

A. Y-12 Training and Qualification: For the last two weeks, we've reported that at least fifteen Y-12 fissile material handler (FMH) positions are only qualified, but not certified, contrary to the requirements of DOE Order 5480.20A. On February 23, BWXT provided its formal justification for continued operation to the Y-12 Area Office (YAO):

1. BWXT commits to immediately discontinue use of its process for determining whether FMH's are certified or qualified. (We note that some YAO personnel had previously reviewed and accepted use of this process as far back as 1997.)
2. By March 5, BWXT will reevaluate all of its qualified FMH's in accordance with the 1996 DOE Order 5480.20A Interpretive Guidance to identify those which can still remain only qualified.
3. For those qualified FMH's for which the DOE guidance is still viewed as requiring certification, BWXT commits to propose yet another methodology for making the certification/qualification determination for DOE approval by March 7. Assuming DOE approves this methodology, BWXT will make final determination by April 9 and target to complete any required certifications by April 30.
4. By February 27, BWXT will provide "on-the-floor oversight of operations involving highly enriched uranium" by certified or criticality safety personnel until completion of the requisite training cited above. What exactly this means is undefined; it's not clear whether the oversight person must be in a position to intercede, within line of sight, or merely in the building.

We do not understand the necessity for BWXT's reclassification actions after the March 5 determination. We believe the determination made at that time should be acted upon so as to complete the necessary certifications by the end of March. We are continuing to discuss our concerns with YAO and BWXT management. (1-C)

B. Y-12 Enriched Uranium Operations (EUO): The management self-assessment for reduction and primary extraction pour-up began this week. In parallel, we reviewed the reduction startup plan. While the plan appears relatively thorough, we are puzzled as to how it is invoked. An important control included in the startup plan is the "Data Collection and Evaluation Form" (DCEF), which documents evaluation of the previous run's data by the process engineer and the reduction vessel design engineer. Both parties sign to indicate their approval that it is safe to use a particular reaction vessel for the next run. We see the following issues:

1. None of the reduction procedures reference the startup plan or the DCEF.
 2. The "Blend Sheet" called out in the procedures requires shift manager sign off that the prior run's data was reviewed but does not reference the startup plan or DCEF.
 3. The Blend Sheet does not include the vessel number, and therefore does not preclude the operators from using a different vessel than verified by the shift manager (via the DCEF) as acceptable for use.
- We will follow up to verify that the reduction controls are adequately implemented. (2-A)

C. Y-12 Integrated Safety Management (ISM): Mr. King visited Y-12 on Thursday to discuss preparations and expectations for the DOE ISM verification currently slated for May 2001. BWXT's own independent ISM verification review is scheduled to occur March 1 - 14, 2001. (1-C)

cc: Board Members