DEFENSE NUCLEAR FACILITIES SAFETY BOARD

June 8, 2001

TO: J. Kent Fortenberry, Technical Director

FROM: Paul F. Gubanc, Oak Ridge Site Representative **SUBJ:** Activity Report for Week Ending June 8, 2001

Site Representative David Moyle's last day was June 5. Staff member Coones arrived on site Thursday to provide site representative office coverage. Mr. Gubanc started annual leave Friday.

A. <u>Y-12 Disassembly</u>: On Monday, June 4, the NNSA Readiness Assessment (RA) for the new disassembly campaign was terminated due to additional and significant instances of lack of readiness. Several key observations from this week include:

- 1. The NNSA RA team made the determination to terminate without prompting and YAO management supported that determination.
- 2. YAO, in a letter dated June 6, cited problems with this and one other recent startup review and expressed concern with BWXT readiness preparations and reviews. While appropriate, the letter does not clearly highlight line management's failure but could instead be viewed as solely an indictment of the BWXT readiness review process. A review of the history of both startups reveals significant issues with line management's involvement, understanding and judgement.
- 3. BWXT and the YAO FacilityRep for Building 9204-2E continued to pursue an RA-identified issue with the HEPA-filtered walk-in hood. Based on this followup, configuration problems were also found and work stopped in a second hood at 9204-2E and a hood in 9204-4. (2-A)
- B. <u>Y -12 Training</u>: As mentioned last week, BWXT on May 23 implemented a revision to the Y-12 training procedure which overly restricts the definition of "control manipulations" in DOE Order 5480.20A to only those which protect "against a criticality accident." (The NNSA RA of disassembly also made this observation.) The double-contingency principle of criticality safety precludes any single change from causing a criticality and thus this restricted definition results in few, if any, control manipulations. Such a definition appears contrary to the intent of the order and it is disappointing that this was not previously recognized such since this definition was first used by BWXT in late-March. As of Thursday, BWXT is revisiting this definition and its implications. YAO has yet to provide a letter of direction in this regard. (1-C)
- C. <u>Y-12 Material Storage</u>: On May 18, BWXT submitted its proposal to YAO to relocate all materials from Building 81-22 to more suitable storage locations by the end of calendar year 2001. BWXT has already taken action to repack and relocate 186 containers from Building 81-22 to a B-24 box (i.e., new Sea/Land container). My observations from reading the plan:
- 1. The BWXT plan is terse, direct, and leaves the reader with a sense that the authors know what needs to be done to be successful (e.g., hazard evaluation, USQD's, readiness determination, etc.). The plan addresses only 81-22; other storage buildings will be addressed separately.
- 2. Had this plan and its predecessor documents been shared with the Board staff earlier, and/or in draft form, the need for the Board's May 29th letter may have been obviated.
- 3. The plan's success is largely dependent on storage space being cleared of scrap and excess material in Building 9204-4. To make this happen will require dedicated, cross-disciplined leadership. Also, the current users of that storage space have no programmatic driver to vacate and thus senior management will need to provide suitable impetus and guidance. (1-C, 3-A)

cc: Board Members