

DEFENSE NUCLEAR FACILITIES SAFETY BOARD

September 21, 2001

TO: J. Kent Fortenberry, Technical Director
FROM: Paul F. Gubanc, Oak Ridge Site Representative
SUBJ: Activity Report for Week Ending September 21, 2001

Staff member Helfrich was at Y-12 this week to assist with Site Rep duties.

A. DOE Environmental Management (EM) Control of Authorization Bases (AB): This week, Gubanc held a series of meetings with DOE-Oak Ridge EM (ORO/EM) and its prime contractor, Bechtel Jacobs Company (BJC), to discuss concerns with their control of AB. Highlights:

1. BJC has operated a Y-12 depleted uranium storage facility (see September 7, 2001, weekly report) outside the approved AB since 1998. Both ORO/EM and BJC had knowledge of this problem since 1998. Based on our inquiries, facility work has been stopped, procedures and postings revised, and an occurrence report, unreviewed safety question determination (USQD) and justification for continued operation (JCO) prepared.
2. ORO/EM and BJC are not complying with the annual AB update requirement of the SAR Rule (10CFR830). ORO/EM never imposed the annual update requirement of 5480.23 in the BJC contract; even after this deficiency was identified in DOE's February 2000 ISM review. Most of the 31 nuclear facility AB's under ORO/EM and BJC date back to 1997/1998.
3. On Tuesday, ORO/EM line management advised that they could not fill a September 7 information request because they could not locate the AB's for their 31 nuclear facilities. Successive meetings with DOE-ORO senior management confirmed this abhorrent state. As of Friday, ORO/EM was attempting to acquire a complete set of AB documents from BJC.
4. ORO/EM line management acknowledged that their technical expertise and discipline in regards to AB is woefully inadequate and is now taking measures to acquire subcontractor expertise and training. This same issue was also identified in the February 2000 ISM review.
5. On September 11, the ORO Deputy Manager for Operations commissioned an independent review of ORO's process for safety basis review (in response to the AB concerns identified during the readiness review of ORNL Building 3019). We've been assured that this review will include evaluating ORO line management practices for both ORNL and BJC. (1-C)

B. Fire Protection: The staff met with BWXT to discuss the Project Management Plan for the Y-12 Fire Protection Program Comprehensive Corrective Action Plan. This document was prepared partially in response to a Board letter issued August 18, 2000. Review of the plan indicates it is thorough and detailed, covering the programmatic shortcomings identified by the Board staff. Most of the short-term actions identified in the plan have been completed and BWXT reports that funding for the next ten years of the plan (\$150M) has been allocated. Staff review indicated that the current plan had no allocation for safety analysis that may be required to support suppression system changes in buildings 9212, 9204-2E, 9204-2, 9201-5 and 9204-4. The plan did not indicate that any of the identified deficiencies required compensatory actions until resolution and it also shows some long-term issues continuing to be studied instead of resolved, such as sprinklers in B-1 Wing, removal of cork insulation, and emergency egress in Building 9212. Although required by DOE orders, the plan does not discuss the fire hazards analyses that are required for the two EM Category 2 nuclear facilities at Y-12. (1-C)

cc: Board Members