

DEFENSE NUCLEAR FACILITIES SAFETY BOARD

February 21, 2003

TO: J. K. Fortenberry, Technical Director
FROM: D. F. Owen, RFETS Site Representative
SUBJECT: RFETS Activity Report for the Week Ending February 21, 2003

Response to the Board Letter of March 19, 2002. The Board's letter forwarded to the DOE Office of Environmental Management (DOE-EM) staff observations in the area of activity-level work planning including DOE-RFFO's oversight of work planning at RFETS. In June, DOE-EM provided a response identifying actions addressing the observations. As reported on September 27th, and October 11th, some progress had been made by Kaiser-Hill in establishing a mentoring program to improve work planning but little progress had been made by DOE-RFFO in implementing actions to perform proper oversight of work planning. This week, RFETS personnel briefed the Board via video-conference on progress in these areas. Kaiser-Hill management noted that the mentoring program for work planning personnel is proceeding at an improved tempo and higher quality than existed in late 2002. Kaiser-Hill management pointed out a number of benefits from engagement by the mentors including a sharp decrease in the rate of events attributed to poor work planning during the past several months. DOE-RFFO management noted that their monthly, quarterly and semi-annual assessments of work planning as described in the DOE-EM response are being conducted and available results have been transmitted to Kaiser-Hill. Both DOE-RFFO and Kaiser-Hill management indicated to the Board that these actions to improve work planning have been effective and are to be continued. (1-C)

Annual Integrated Safety Management (ISM) Assessment. As reported on December 20th, DOE-RFFO issued the report of their 2002 Annual ISM Assessment to Kaiser-Hill that included findings and opportunities for improvement on certain issues for DOE-RFFO and Kaiser-Hill. Late last week, corrective action plans addressing these issues were transmitted by the DOE-RFFO Manager to DOE-EM. This transmittal also included a declaration by the DOE-RFFO Manager, requested by DOE-EM, that ISM is fully implemented at RFETS subject to completion of the corrective actions in response to the Annual ISM Assessment. (1-C)

Restart of Low Level Waste (LLW) Container Repacking in 750 Pad Tent 5. The site rep. was recently informed of Kaiser-Hill's plans to restart repacking of LLW containers (various crates and drums) in Tent 5 of the 750 Pad in the next few months. This activity restart had not been included in DOE-RFFO Startup Notification Reports transmitted to DOE-EM as required by DOE Order 425.1, *Startup and Restart of Nuclear Facilities*. The site rep. discussed this issue with DOE-RFFO management. Late last week, DOE-RFFO transmitted a revision to the report to DOE-EM that addressed the restart of LLW repacking in 750 Pad Tent 5.

Repacking of LLW containers had been performed in Tent 5 from 1997 to 1999. The repacking will be performed within a radiological containment tent that is within a ventilated permacon structure in Tent 5. It is anticipated that at least 800 LLW containers will be processed during the next few years. Based on the hazard associated with the few LLW containers opened at any one time for repacking, DOE-RFFO approved Kaiser-Hill's proposal that readiness be confirmed by a line management assessment and that no independent Readiness Assessment is required. (3-A)