

DEFENSE NUCLEAR FACILITIES SAFETY BOARD

March 14, 1997

TO: G. W. Cunningham, Technical Director
FROM: P.F. Gubanc & D.G. Ogg, Hanford Site Representatives
SUBJECT: Activity Report for Week Ending March 14, 1997

Mr. Ogg was in training three days this week to complete Radworker II annual training, Hazardous Waste Operations training (8 hr), annual physical certification, and annual respirator training and mask fit.

A. Tank Sampling Resumption: As discussed in last week's report, DOE-RL placed a hold on tank push-mode core sampling due to questions regarding the adequacy of the authorization basis (AB). On March 8, 1997, DOE-RL amended their prior direction of March 1, as follows:

1. DOE-RL reinstated the pre-March 1 AB for push-mode sampling and added two additional controls (i.e., a tank bottom interlock and a downforce limit). These two controls are already used in the field.
2. DOE-RL reinstated the contractor's ability to conduct unreviewed safety question determinations against approved Justifications for Continued Operations and related Standing Orders (i.e., flammable gas controls).
3. DOE-RL lifted the hold on push-mode sampling but reaffirmed its desire to formally approve in-tank work involving the Light Duty Utility Arm and cutting of saltwell pump casing screens. Push-mode sampling resumed this week.

While some AB interpretation questions remain, they can be resolved on a non-controlling basis. We agree with DOE-RL's current direction and guidance.

B. K-Basins Radcon Improvements: In the past, the Board's site representatives noted radiological control practices at the K-Basins that were not consistent with good radiological conduct of operations. One practice involved post-job workers who had not been surveyed after doffing their anti-contamination clothing, and who could be potentially contaminated, sharing the same buffer area as pre-job workers. As the post-job workers made their way approximately thirty feet to the whole body counter, they crossed paths with, and could potentially contaminate, pre-job workers. A second poor practice involved a requirement imposed by facility management that all workers, upon exiting a contamination area, use a PCM-1B half-body monitor and receive a whole body frisk for beta/gamma and alpha contamination from a qualified radcon technician. This practice, while conservative, was not an effective use of resources and could foster a mistrust of either the PCM-1B or the whole body frisk performed by the radcon technician.

In recent weeks, K-Basins personnel completed actions that correct these two problems. Workers are just completing construction on vestibules in both KW and KE Basins that will allow post-job workers to exit the basin area through a different path than that used by pre-job workers to enter the basin area. Additionally, facility management has removed the requirement that all workers receive a whole body frisk from the radcon technicians as long as they successfully pass through the PCM- 1B. Workers still have the option of requesting a whole body frisk from the radcon technician if they so desire.

C. Tank Farm Labeling and Drawings: As reported on February 7, tank farms has established a labeling and drawing upgrade project. The project is tasked on a farm-by-farm basis to perform, or track completion of, the following actions:

1. Replace old labels with new labels which conform to a common standard.
2. Issue revised essential drawings which have been verified (by walkdown) to reflect the as-built condition and new labeling. This includes the creation of new integrated system drawings (referred to as H-14's).
3. Identify and correct discrepant hardware configurations (e.g., violations of National Electric Code) found during walkdowns.
4. Develop a master equipment list for tank farms.
5. Issue revised operating and maintenance procedures which reflect the new labeling and correct discrepancies found during walkdowns.
6. Train tank farm operations and maintenance personnel to understand the changes taking place and use the new tools available to them.
7. Train operations, engineering and projects personnel on how to maintain the new labels and drawings once they are installed and issued.
8. Assist on-going construction projects to maximize consistency with tank farm labels and drawings and to facilitate a smooth transition to operations. (In the past, projects were allowed to select their own labeling and drawing protocols.)

Each of the above actions must be coordinated and sequenced with the others to assure a smooth transition and to minimize confusion. Within the next few weeks, the contractor expects to relabel BX farm, which was selected for its relative simplicity. Mr. Gubanc is closely reviewing the preparations and process to relabel BX farm to assure that each of the above actions is fully executed and that they are well integrated.

cc: Board Members