

## **DEFENSE NUCLEAR FACILITIES SAFETY BOARD**

TO: Timothy Dwyer, Technical Director  
FROM: Wayne Andrews and David Kupferer, Site Representatives  
SUBJECT: Oak Ridge Activity Report for Week Ending September 2, 2011

**ORNL Tank W-1A.** DOE conducted an outbrief of its Operational Readiness Review (ORR) on Monday (see last week's report). The ORR team concluded that project activities can be completed successfully and in compliance with applicable requirements upon resolution of the issues identified during the review. The ORR team identified five findings (one pre-start, four post-start), nine observations, and three proficiencies. The pre-start finding was related to the obstruction of the egress path between the weather enclosure and service annex during operations. The UCOR project manager expects to commence operations on September 7<sup>th</sup>. The Board's staff will continue to follow this project during the execution of operations.

**Work Planning and Control.** Following the staff's recent review of activity-level work planning and control (see the 8/19/11 report), both the Production Division and the Facilities, Infrastructure & Services (FI&S) Division (which includes most maintenance activities) issued standing orders. Both standing orders include compensatory actions to address weaknesses in the Job Hazards Analysis (JHA) process.

The Production standing order requires that supervisors perform a review of the applicable JHA prior to conducting production operations. The standing order includes specific criteria to be used during this review. This review must be documented and approved by the production manager. The FI&S standing order includes the following compensatory actions: (1) work planners must perform a scoping walkdown to ensure an understanding of the work and the conditions of the work area during development of work packages for both minor and complex work, (2) for complex work, personal protective equipment requirements, training requirements, and applicable controls from the JHA must be incorporated into the work instructions for complex work and any conflicts with these requirements must be resolved, (3) if the scope of the applicable JHA exceeds the scope of the work being performed, the JHA must be marked to identify the hazards and controls that are specific to the tasks being performed, and (4) a workability walkdown must be performed prior to conducting complex work to confirm that the appropriate controls have been identified in the work instruction.

**Conduct of Operations/Criticality Safety.** While executing a project that included reconfiguring a storage vault that was actively being used to store nuclear components, B&W needed to empty the vault prior to construction activities. In March of this year, the project team convened several meetings with criticality safety personnel that included discussions on where to temporarily relocate 18 30-gallon drums that contain nuclear components. At that time, involved personnel understood that revisions to criticality safety documentation—to analyze and allow storage of 30-gallon drums in their new location—might be necessary. On April 8th, material management personnel moved the 30-gallon drums to an alternate storage vault. Storing the drums in the alternate storage vault violated the criticality safety requirements contained in both the applicable procedure and criticality safety posting. Two weeks ago, a Criticality Safety Officer discovered the criticality safety deficiency and made appropriate notifications.