

DEFENSE NUCLEAR FACILITIES SAFETY BOARD

TO: Timothy Dwyer, Technical Director
FROM: Rory Rauch, Site Representative
SUBJECT: Oak Ridge Activity Report for Week Ending September 7, 2012

NPO Line Oversight: This week, the NPO Manager issued a memorandum (memo) to his staff formalizing new expectations for the NPO line oversight process. The memo states that the current approach in which only findings against requirements may be provided to the contractor for action (as stated in the procedure titled *YSO Assessment Process*) is no longer effective. NPO assistant managers, within their authority as contracting officer representatives, are expected to transmit issues to the contractor for action. The memo defines issues as both non-compliances with requirements as well as any performance-related problems the assistant manager determines are sufficiently significant to warrant attention from the contractor. The memo states that NPO will immediately institute a monthly issues management meeting. At this meeting, the assistant managers will report to the NPO Manager and Senior Scientific and Technical Advisor the issues they have transmitted to the contractor and provide conclusions regarding the contractor's performance and the health of the contractor's assurance system. This guidance will be codified by September 30, 2012, in a new NPO oversight and assessment procedure.

Radiological Work Permit (RWP) Compliance: The recently discovered inconsistencies between the personal protective equipment (PPE) specified in an RWP and a beryllium work permit (BWP) for an operation in Building 9204-2E (see 8/31/12 report) raised questions regarding the policy for compliance with RWP requirements. In this specific case, some workers believed it would be acceptable to resolve differences between permit requirements by donning the PPE they considered to be more protective. As discussed in last week's report, conflicts between the PPE specified in different permits for the same job should not exist. However, the confusion regarding what constitutes "bounding" PPE and whether additional PPE could be donned at the worker's discretion also indicates that certain workers, supervisors, and radiological control technicians do not fully understand the requirements for compliance with RWP requirements. The B&W RWP procedure prohibits workers from making unilateral determinations to wear additional PPE beyond that specified in the RWP. Per the procedure, the worker may submit a request to wear additional PPE. The request must then be evaluated in accordance with the B&W procedure titled *Personal Protective Equipment Program* to ensure that the additional PPE does not introduce a new hazard. The Nuclear Safety Operations (NSO) organization is working with other B&W stakeholder organizations to address this and other work planning-related issues that have arisen in recent weeks.

Critique Process: B&W has revised its critique process in response to the August 10, 2012, NPO memo requesting a re-evaluation and improvement of the Y-12 critique process (see 8/17/12 report). The most significant change to the process is the requirement for a more formal fact finding (termed a "Work Team Investigation") within one business day of the event. The responsible vice president will then decide whether to hold a critique (termed a "Critique Summary Discussion") following the Work Team Investigation (the NSO organization must concur with this decision). The intent of this change is to spend less time at the critique on timeline development and more time determining appropriate corrective actions, extent-of-condition, and the necessity of any follow-on causal analysis. In another significant change, B&W plans to transition the role of the current critique facilitators (who do not serve in a line management role) to one of mentoring and evaluation. The responsibility for critique facilitation will then lie with line management. B&W plans to pilot the new process in the production organization during the next two weeks and implement the new process by September 30, 2012.