

## DEFENSE NUCLEAR FACILITIES SAFETY BOARD

TO: Steven Stokes, Technical Director  
FROM: William Linzau and Rory Rauch, Site Representatives  
SUBJECT: Oak Ridge Activity Report for Week Ending February 13, 2015

**Conduct of Operations/Work Planning and Control:** The site reps and NPO management have recently communicated concerns to CNS senior management regarding the lack of effective CNS guidance to govern the recovery from an abnormal or unexpected field condition. Site procedure Y14-001, *Conduct of Operations Manual*, after providing an allowance for workers and the shift manager to take immediate actions to achieve a safe and secure condition, states “additional actions to restore the equipment and facility should be reviewed and approved under normal work control processes.” The site reps have observed instances in which contractor management has established and approved non-immediate recovery actions through informal, undocumented means rather than the process that would normally govern work control for the affected recovery tasks (e.g., technical procedures). While a less formal approach is not explicitly prohibited by site procedures, the site reps believe that such informality can undermine key aspects of work planning and control, especially for significant process abnormalities that require a complex set of recovery tasks or the integration of input from different safety disciplines (e.g., alloy casting event, see 8/1/14 report).

The site reps believe there are two key factors contributing to this concern. The first is a lack of guidance in Y14-001 regarding what constitutes the appropriate work control process to govern the recovery for a given type of abnormal or unexpected event. The second contributing factor is the lack of a definition in Y-12 procedures for what constitutes a “safe and secure” condition. CNS management has agreed to address the concern and plans to update the site reps and NPO management on their progress as specific improvement actions are developed.

**Transuranic Waste Processing Center (TWPC):** Last week, the OREM Federal Project Director sent a letter to inform Wastren Advantage, Inc. (WAI) that OREM will be implementing an enhanced oversight plan at TWPC. The plan will provide a structured approach to increase oversight at TWPC due to the impending contract transition. The increased oversight will be accomplished by assigning additional facility representatives, establishing a minimum field oversight presence for safety and health oversight personnel, and maintaining enhanced awareness of TWPC activities by OREM’s subject matter experts and safety system oversight personnel. The plan will remain in effect until July 2015 but may be modified if the date of transition changes.

**Quality Assurance (QA):** In late September, 2015, a member of NPO’s QA staff identified that new HEPA filters were being stored in a Sea-Land container near the Technology Development building, which did not comply with site QA requirements (see 10/3/14 report). In January, a CNS HVAC design engineer acquired surplus HEPA filters stored in a Sea-Land container located outside Building 9212 and arranged for these filters to be installed in Building 9204-2E. The design engineer assumed that these filters could be used – despite being stored in non-compliant storage conditions – as long as the 10-year life of the filters was reduced to five years (as was done with the filters from the September event). None of the parties involved realized that the filters were manufactured in the 2010 timeframe and the end of the reduced five-year lifespan was imminent. CNS management has implemented near-term corrective actions that include issuing a standing order that requires QA personnel approval prior to the release of all HEPA filters for installation; briefing facility engineering and HEPA filter work crews on this event; and completion of a non-conformance report for the filters installed in the Building 9204-2E material testing laboratory.