

DEFENSE NUCLEAR FACILITIES SAFETY BOARD

September 15, 1994

MEMORANDUM FOR: G. W. Cunningham, Technical Director

COPIES: Board Members

FROM: Timothy J. Dwyer

SUBJECT: Report on Review of Idaho National Engineering Laboratory
Facility Representatives Program

1. **Purpose:** This report documents DNFSB staff observations from a review of the DOE Idaho Operations Office (DOE-ID) Facility Representative Programs conducted on site on July 14, 1994 by DNFSB staff member Timothy J. Dwyer.
2. **Summary:** The DOE-ID Facility Representative Program is not extensively documented, although a continuing effort is underway to upgrade the documentation and formality of the program. The recently developed *Facility Representative Facility Specific Qualification Module for the Test Reactor Area* and *Facility Representative Position Descriptions*, in particular, present a level of detail not previously observed at other DOE sites. Of note, at this stage of DOE-ID program development, facility representative duties are assigned to some individuals who have not completed any of their qualifications.

Despite these shortcomings, the individual Facility Representatives observed at DOE-ID all exhibited good technical knowledge, inquisitive attitudes, and familiarity with their responsibilities. They appear to form a good base on which to build an effective Facility Representative Program.

3. **Background:** DNFSB Recommendation 92-2 was issued on May 28, 1992 to recommend improvements to DOE's Facility Representative Programs. Among express corrective actions, the DOE Implementation Plan and subsequent Action Plan specified that each field organization would conduct a self-assessment using the recently issued standard DOE-STD-1063-93, *Establishing and Maintaining a Facility Representative Program at DOE Nuclear Facilities*. Results of this self-assessment for DOE-ID were included in the Recommendation 92-2 Quarterly Status Report dated May 13, 1994. DOE-headquarters also reviewed the DOE-ID Facility Representative Program; results of this review were also presented during this visit.

This DNFSB staff review was largely conducted at the working level. Three DOE-ID facilities were visited. One fully-qualified Facility Representative and one unqualified (but assigned) Facility Representative were observed in the performance of their duties; one core-qualified (but not facility-specific qualified) Facility Representative was observed in

the performance of her duties under the instruction of a fully-qualified Facility Representative.

4. **Discussion:** Observations from this review are provided in three categories: program documentation, program implementation, and program personnel.

- a. **Program Documentation.** DOE-ID does not have extensive Facility Representative program documentation; even the program document itself is only in rough draft form. Facility specific qualification cards exist in approved form only for the Test Reactor Area (TRA), although Idaho Chemical Processing Plant (ICPP) does have some (dated) qualification material to work with. No formalized system of surveillances and assessments exists.

DOE-ID has an extended effort underway to upgrade the documentation and formality of the program. This is particularly evident in the newly developed and approved *Facility Representative Training Program Plan*, *Facility Representative Facility Specific Qualification Module for the Test Reactor Area*, and *Facility Representative Position Descriptions* currently in force for DOE-ID Facility Representatives. The core qualification card and the position descriptions, which are based on the DOE Office of Field Management (FM-1) model, present a level of detail not previously observed at other DOE sites. Of note, however; documentation to define what is required to *satisfy* specific qualification card objectives (signature requirements) still does not exist.

Program training and qualification requirements for each Facility Representative candidate are documented in Individual Development Plans (IDPs) using the format developed through the DOE Implementation Plan for Recommendation 93-3. At this time, there are no provisions for disqualification/requalification.

- b. **Program Implementation.** DOE-ID employs 14 Facility Representatives assigned to 7 major facility areas (e.g., TRA, ICPP, etc.). Of these 14, 11 have completed core qualification; of these, six have also completed facility-specific qualification and are fully qualified. Operationally, each Facility Representative reports to a co-located DOE Facility Manager. However, Facility Representative assignments are under the control of the Facility Representative Matrix Team Leader, who reports to the Manager, DOE-ID, through the Assistant Manager in the Office of Program Execution.

Currently, Facility Representative Core Qualification involves mostly self-study (with each section reportedly verified by oral examination) and on-the-job (OJT) performance requirements, with selected classroom training courses in conduct of operations, assessment methods, and root cause analyses. Completion of Core Qualification involves an oral examination board. Facility Representative Facility-Specific Qualification involves a generic qualification standard, customized to reflect expected areas of responsibility via negotiation between the DOE Facility Manager, the Facility Representative Matrix Team leader, and the candidate. This phase of qualification is all self-study, culminating in a written examination, facility walkthrough, and oral

examination board. DOE-ID is instituting a policy that each oral examination boards will include among its members a fully-qualified Facility Representative.

Of note, at this stage of DOE-ID program development, facility representative duties are assigned to some individuals who have not completed any of their qualifications yet. Compensation for this shortcoming is available in some (but not all) site areas; for example, DNFSB staff observed an unqualified ICPP Facility Representative being assisted and trained by a fully qualified counterpart assigned to nearby facilities in the same area (ICPP) of the site. However, the unqualified Facility Representative was still *solely responsible* for the specific facilities assigned to her.

Further assistance is available to *all* Facility Representatives, for specific areas of inquiry, from the DOE-ID Office of Program Evaluation. Based on an informal request, Facility Representatives can arrange for the short term assignment of individual technical specialists for audits, appraisals, or reviews at their facility.

- c. **Program Personnel.** The following summarizes observations of the Facility Representatives (qualified and unqualified) during the performance of their duties:
1. Facility Representative candidate screening standards appear to be more effective than those observed at other sites. Of 14 individuals, six have naval nuclear operations experience, six have civilian naval nuclear/shipyard experience, two have Nuclear Regulatory Commission (NRC) staff experience, one (specifically selected for assignment to ICPP) has radiological laboratory experience. All Facility Representatives observed showed good technical knowledge, inquisitive attitudes, and familiarity with their responsibilities.
 2. ICPP has exhibited continuing problems with poor radiological control practices, including a general lack of concern with personnel and equipment crossing radiological control boundaries, inadequate frisk/swipe survey practices, etc. The Facility Representative showed good awareness of potential radiological deficiencies, and took prompt action to correct them *and* bring them to the attention of contractor facility management. (However, despite these efforts by ICPP Facility Representatives, ICPP radiological control practices *remain* poor.)
 3. The core-qualified Facility Representative (under instruction) had significant weaknesses in mechanical system and facility-specific administrative procedure knowledge. However, she was clearly aware of the improvements required in her knowledge base and appeared to be actively attempting to compensate.
 4. The unqualified Facility Representative showed good knowledge of radiological control principles and excellent perseverance in investigating and involving DOE-ID management in stopping an ill-planned and poorly supervised Basin Infiltration Test that was actually being run by separate DOE-ID/contractor departments *outside* the boundary of his assigned facility.

5. **Future DNFSB Staff Actions:** In the near term, review DOE-ID Facility Representative Program documentation as it becomes available. Specific Facility Representative qualifications will be reviewed on a facility-specific basis as DOE-ID facility activity schedules dictate.