

## DEFENSE NUCLEAR FACILITIES SAFETY BOARD

November 25, 2011

**MEMORANDUM FOR:** T. J. Dwyer, Technical Director  
**FROM:** B.P. Broderick and R.T. Davis  
**SUBJECT:** Los Alamos Report for Week Ending November 25, 2011

**Federal Oversight:** In September, the site office requested LANL to provide a status report on the adequacy and implementation of criticality controls at the Plutonium Facility, safety system operability issues for transuranic waste facilities, and the adequacy of safety management programs for both facilities. LANL provided an initial response in October and was scheduled to provide a comprehensive report on planned actions and performance tracking metrics by the end of November.

In a letter to the laboratory last week, the site office noted significant progress and management focus on criticality safety improvements at the Plutonium Facility but stated that the comprehensive report should fully address issues identified by a recent criticality safety committee review and actions to improve conduct of operations. For the transuranic waste facilities, the site office noted that LANL responses to safety system operability issues appear to justify the status quo and not actions required to “bring about the significant step-improvement in transuranic waste operations that is needed.”

To ensure the LANL response on improving the safety of nuclear operations at these facilities includes the appropriate depth of analysis and adequate corrective actions, the site office letter directed the laboratory to delay their comprehensive report until December 19<sup>th</sup>.

**Plutonium Facility – Safety Basis:** Last week, LANL submitted a revised Justification for Continued Operations (JCO) associated with the increased seismic risk identified by the SAFER analysis. The revised JCO takes credit for completion of upgrades to the Plutonium Facility roof such that collapse scenarios during a seismic event are no longer credible. LANL does identify that reevaluation of the facility performance with the roof upgrade in place is ongoing. Any issues that result from this evaluation will be dispositioned using the appropriate site procedure (e.g. unreviewed safety question). Compensatory measures for the previously identified seismic issues remain largely unchanged. The identified expiration date for this JCO is May 11, 2012. LANL continues to pursue facility upgrades to resolve other identified vulnerabilities.

This week, the site office approved a LANL request to close the outstanding Potential Inadequacy of the Safety Analysis (PISA) associated with miscellaneous vault water bath containers. Six “K2” containers remain in the vault water bath that do not meet the safety class performance criteria described in the Documented Safety Analysis (DSA), which caused initial declaration of the PISA in December 2009. However, these containers and safety basis are now appropriately described in the 2011 DSA that was approved in October 2011. Facility implementation of safety controls for the K2 containers is not required. The site office approval letter requests a schedule for disposition of the remaining K2 containers within 90 days.

**Radioactive Liquid Waste Treatment Facility:** In October, LANL requested site office concurrence with a safety basis strategy for developing a compliant DSA and Technical Safety Requirements for this facility in 18 months. Last week, the site office disagreed with the 18 month schedule and directed the laboratory to submit compliant documents by September 2012.