DEFENSE NUCLEAR FACILITIES SAFETY BOARD

January 22, 1999

TO: G.W. Cunningham, Technical Director

FROM: Paul F. Gubanc, Oak Ridge Site Representative

SUBJ: Activity Report for Week Ending January 22, 1999

Staff member Dan Burnfield was at Y-12 this week attending a DOE complex-wide Enhanced Work Planning Steering Committee meeting.

A. <u>ORNL U-233 Inspection Readiness Plan</u>: In my December 18, 1998, report I identified several concerns with ORNL's preparations to commence U-233 inspections this April. On January 15, ORNL submitted their readiness determination proposal to DOE. My review of the ORNL proposal found it significantly lacking. Examples include:

- 1. ORNL does not identify whether they will conduct either a Readiness Assessment (RA) or an Operational Readiness Review (ORR) nor is there identification of the startup approval authority.
- 2. The scope of the readiness evaluation is not clearly defined. For example, since funding and work on the U-233 repackaging hot cell has been stopped, it would seem obvious that U-233 repackaging in this hot cell cannot be evaluated at this time.
- 3. The core requirements which will be assessed are not clearly identified.

The ORNL claim that this proposal complies with DOE O 425.1 and DOE-STD-3006-95 is unsupported. I have discussed my concerns with DOE and will monitor how they proceed.

- B. Y-12 Criticality Accident Alarm System (CAAS) Coverage: In early January, a Y-12 nuclear facility manager identified inconsistencies in postings of high noise areas as related to CAAS coverage. (Areas where the criticality alarm cannot be clearly heard are posted as requiring supplemental alarming dosimetry as a compensatory measure.) As LMES investigated further, they discovered that CAAS testing is routinely performed without verifying audibility in normally unmanned spaces (e.g., high noise and confined spaces). Pending verification of confined space training site-wide (regarding the standby man's response to a CAAS alarm), LMES this week imposed a separate over-check on all confined space entries. This is a positive example of the contractor identifying real problems through field presence and "pulling the string."
- C. <u>HEPA Filter Test Facility (FTF)</u>: As of Friday, DOE-OR's direction is as follows:
 - 1. Funding has not been restored by DOE-OR to operate the FTF.
 - 2. Bechtel-Jacobs (the EM contractor), has been directed by DOE to develop a billing mechanism for charging users of the FTF on a "per filter" basis.
 - 3. It is not yet clear to LMES (the FTF operator for Bechtel-Jacobs) how they will operate under a charge-back arrangement (especially considering none of the users had planned to pay for this service this fiscal year).

cc: Board Members