DEFENSE NUCLEAR FACILITIES SAFETY BOARD

TO: G.W. Cunningham, Technical DirectorFROM: Paul F. Gubanc and David T. Moyle, Oak Ridge Site RepresentativesSUBJ: Activity Report for Week Ending October 22, 1999

Staff members Fortenberry, Andrews and Zavadoski were on-site Monday and Tuesday to review weapons programs, operational status of the HEPA Filter Test Facility and ORNL Building 3019.

A. <u>Enriched Uranium Operations (EUO) Reduction Process</u>: LMES is working to address a readiness assessment finding on the use of non-code stamped reactor vessels. Five vessels have passed 5X visual inspection and three of those have passed radiographic weld inspection. EUO needs only two vessels for its initial metal production runs. According to the corrective action plan, a hydrostatic test will also be performed on a "representative vessel." EUO intends to test a vessel which will not be used for production runs. We do not understand why EUO would choose not to test their production vessels to establish additional confidence in vessel integrity. DOE is adamant that they will not allow EUO to use any vessel in a production run without first performing a hydrostatic test on it. (2-A)

B. <u>Y-12 Modernization and Project Management</u>:

- 1. Last week, Dr. Paul Rice visited Y-12 to conduct a scoping review of DOE and LMES project management. He is expected to commence his project management review in November.
- 2. LMES completed the Feasibility Study for the Special Materials Complex in September 1999. The Conceptual Design Report is targeted for March 2000.
- 3. LMES expects to complete the Feasibility Study for the Enriched Uranium Processing Facility in December 1999. A draft Systems Requirements Document has been completed.
- 4. On October 19, DOE-OR issued its own review of Y-12 Defense Program projects. While the detailed findings were not surprising, DOE's conclusions reveal a fundamental failure to understand key aspects of technical project management. For example:
 - a. DOE identified many examples of non-compliance with engineering procedures but concluded "this is not considered significant because of the graded approach for the type of projects reviewed." We believe the level of procedural detail may be graded, but not compliance.
 - b. "The [DOE] team saw a clear understanding of the role of engineering and construction management in configuration control, but did not see strict compliance to procedures." If personnel are not adhering to change control procedures, then they really <u>don't</u> understand.
 - c. DOE concluded that they saw "an understanding of the role of the designer in approving changes." However, the report documents numerous examples of where design engineers were not involved in design changes. Again, we doubt the level of "understanding."

We will discuss this last item with DOE-OR senior management next week. (1-C, 2-A)

C. <u>DOE Oak Ridge (DOE-OR) Actions in Response to Recent Board Letters</u>: These recent examples reflect DOE-OR's responsiveness to concerns formally communicated by the Board.

- 1. Per our weekly letters (8/27/99 and 10/8/99), DOE-OR has prepared action plans for emergency management and chemical safety in response to the Board's July 8 letter.
- 2. On October 14, the DOE-OR Manager directed her line managers to assess and status their fire protection posture by November 15. This was prompted in part by the Board's October 5 letter.
- 3. On October 22, DOE-OR directed LMES to prepare an accelerated corrective action plan to update Y-12 safety documentation in response to the Board's October 6 letter. (1-C)