DEFENSE NUCLEAR FACILITIES SAFETY BOARD

TO: J. Kent Fortenberry, Technical Director

FROM: Paul F. Gubanc and David T. Moyle, Oak Ridge Site Representatives

SUBJ: Activity Report for Week Ending September 1, 2000

Mr. Coones was at Y-12 assisting with Site Rep duties while Mr. Moyle is on paternity leave. Mr. Andrews was at Y-12 to observe contractor reviews for a dismantlement campaign. Mr. Massie was at ORNL to observe the supplemental DOE ISMS verification review which included Building 3019.

A. <u>Y-12 ISM Verification</u>: The followup DOE ISM review of Y-12 concluded August 31. Key observations from the review team's report include:

- DOE agrees with the conclusions of the LMES ISM independent assessment.
- ISM has been implemented in EUO and Nuclear Operations. With isolated exceptions, organizations in the Balance of Plant remain at varying stages of attempting implementation.
- Of the nine opportunities for improvement identified in the 1998 review, five remain. These include; mechanisms to force consistent ISM implementation across the plant, issues management, and fire protection. Of particular note, the DOE ISM team identified that Y-12 has failed to formulate budget requests which reflect even the <u>minimum</u> compliance level for fire protection. The Y-12 fire protection staff acknowledges that they continue to lose ground relative to achieving a compliant fire protection posture (see item B).
- The Feedback and Continuous Improvement core function is not effective or implemented.
- Local DOE staffing for Facility Reps, project managers and technical support must increase.

In response to findings from the LMES ISM assessment (see last week's report), on August 29, the LMES General Manager issued direction that all new and existing maintenance jobs be reviewed for appropriate inclusion of job hazard planning. In addition, mentors were assigned to all site organizations and practical training will be provided to the maintenance planning and supervising staff. A corrective action plan to address the thousands of overdue inspections and preventative maintenance items (i.e., what is the safety basis for allowing continued operations) is still being formulated and at this time does <u>not</u> include fire protection systems. (1-C)

B. <u>Y-12 Fire Protection</u>: Mr. Coones conducted a follow up inspection of the fire protection program at Y-12. Further review indicates that preaction and deluge systems are not being tested <u>at all</u>, due to lack of test procedures. Dry pipe systems testing has only recently been restarted, and the failure rate to date is 50%. Building inspections, aside from the major nuclear facilities, have not been performed since November 1999. There are also no test procedures for smoke and heat detectors, so none of this testing is being performed. Firecycle system 7W in 9201-5, which protects material storage as well as other areas in the building, has not had an annual test since 1997. Firecycle system 1 in 9204-2, protecting the special materials production and storage areas, has no record of <u>ever</u> having the annual test performed. These observations, as well as those previously documented in the Board's letter of August 18, 2000, and the ISM reviews, raise questions as to whether the cumulative effect renders the Y-12 fire protection system inadequate to protect public and worker safety. (2-A)

C. <u>Major Y-12 News</u>: On August 24, DOE issued a record \$1,045,000 proposed civil penalty to LMES for 19 violations of the QA Rule. On August 31, DOE announced its selection of the BWXT-Bechtel team for the Y-12 M&O contract. Transition is planned to complete by November 1.

cc: Board Members