DEFENSE NUCLEAR FACILITIES SAFETY BOARD

September 8, 2000

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 8, 2000

Mr. Andrews and outside expert Ralph West were at Y-12 to observe contractor reviews for a dismantlement campaign. Messrs. Hunt and Troan visited Y-12 to review facility deactivation planning and efforts to deinventory and/or stabilize the contents of Building 9206.

A. <u>Y-12 Dismantlement</u>. This week the staff continued to review preparations for a new 6-year long dismantlement campaign. The dismantlement process to be demonstrated this week was postponed due to issues the Management Self Assessment (MSA) team identified with procedures and the Unreviewed Safety Question Determination. The contractor Readiness Assessment (RA), scheduled to begin on September 11, is now delayed. Unresolved staff issues include: the adequacy of identified safety controls; flowdown of these controls and their effective implementation; facility safety basis fire protection deficiencies; inadequate radiological control measures; narrow scope of the contractor RA; and abdication of DOE's readiness review and start up approval responsibilities to the contractor.

The contractor and DOE continue to maintain that this is not a new activity but just a continuation of work they have been doing for years. This discounts that: 1) a <u>new</u> 60 page procedure had to be developed from scratch, 2) a <u>new</u> safety evaluation and approval were generated, 3) activity-specific safety controls were identified and flowed down into the new procedure, and 4) <u>new</u> tooling was designed, fabricated and installed specifically for this effort. A system of this type has <u>never</u> been dismantled in this facility. The last system of this type dismantled anywhere was done in a different Y-12 facility under very different conditions, more than ten years ago. (2-A)

B. <u>ORNL ISM Verification</u>: The followup DOE ISM review of two ORNL divisions concluded September 8. Key observations from the review team's report include:

- ISM has been implemented in the Chemical Technology (CTD, including Building 3019) and the Plant and Equipment (P&ED) divisions. The review noted that many ISMS processes and procedures were only very recently implemented and will require continued attention to mature.
- Specific to Bldg 3019, opportunities for improvement were identified on Work Smart Standards (e.g., DOE Order 5480.19 is currently listed only as guidance) and the integration of hazard identification and control processes (i.e., USQ, authorization basis and criticality safety).
- DOE's ISM verification review of ORNL in early 2000 was unique in its approach and no report was prepared. This review also occurred prior to UT-Battelle assuming control of ORNL. The followup review suggested reevaluating the completeness of DOE's ISM verification. (1-C)

C. <u>Y-12 Building 9206</u>: Overall, there is some improvement in risk reduction and future plans for 9206, but additional risk reduction is needed. The 9206 uranium inventory was reduced by 54% in FY00 with hopes to remove an additional 20% in FY01. Unfortunately, another year has passed without draining solutions from extraction columns which are vulnerable to leaks. Instead, LMES has prepared for pyrophoric material stabilization (a higher perceived risk). Lack of storage space is the primary restriction to column draining and current funding is inadequate to support both stabilization and column draining. At this time, LMES has no plans to drain columns in FY01. (3-B)

cc: Board Members