

## DEFENSE NUCLEAR FACILITIES SAFETY BOARD

**MEMO TO:** Timothy Dwyer, Technical Director  
**FROM:** Matthew Duncan and Rory Rauch, Pantex Site Representatives  
**SUBJECT:** Pantex Plant Report for Week Ending December 23, 2011

**Flooding Controls:** As a result of the 10 year update to the site-specific flooding hazard analysis and the July 2010 flooding event, B&W discovered that it did not have controls to protect against standing water in certain nuclear facilities. This week, PXS0 approved the safety basis change that addresses this hazard. The change incorporates a new workstand for manifold operations that repositions an electrical isolation feature from the base of the stand to the columns. This modification prevents the isolation feature from being compromised by standing water in the facility. Upon making this change proposal effective, B&W will archive a justification for continued operations that had instituted administrative compensatory measures to address the standing water hazard.

**Transportation Operations:** The Pantex technical safety requirements (TSRs) contain a specific administrative control (SAC) that requires drivers of vehicles on plant roads to pull off to the side of the road and stop when a convoy with an escort approaches. The vehicle must remain stopped until the convoy has passed. Last week, an individual failed to fully comply with this TSR. He initially pulled off to the side of the road as a convoy approached, but decided to move the vehicle while the convoy was passing in order to position the vehicle farther from an intersection. Security personnel in the convoy observed the vehicle movement, halted the vehicle, and gathered the passenger's information. B&W management determined the event was not a TSR violation because they judged the driver's initial attempts to pull off to the side of the road to be in compliance with the SAC.

This SAC is one of the dozens of SACs covered by Generic Limiting Condition of Operation (LCO) 3.0.7, which states that, upon discovery of failure to comply with one or more of the listed SACs, compliance with the SAC(s) shall be restored immediately. The LCO then lists specific action statements to restore compliance for each of the associated SACs. This event is the latest in a series of events that indicate weaknesses in the development and implementation of Generic LCO 3.0.7 (see 8/6/10, 5/14/10, 4/23/10 reports). For example, the standing order that implements Generic LCO 3.0.7, is ambiguous in identifying who is required to perform the action statement for the SAC in question. By placing the responsibility on "the affected organization," it is not clear whether security personnel, transportation personnel, or the individual involved in the non-compliance should enter the LCO. This ambiguity resulted in a three day delay in reporting the event to the operations center. Further, the specific LCO action statement for this SAC, "complete the move," does not address the hazard created by the moving vehicle. PXS0 acknowledges these weaknesses and is working with B&W to address them.

**Fire Protection System Upgrades:** NNSA recently issued a memorandum to PXS0 capturing the latest strategy to obtain funding for the projects to replace corroded fire suppression lead-ins (the ductile iron piping from the post indicator valve to the facility fire suppression risers) and obsolete ultra-violet (UV) flame detection systems. NA-10 has opted to forego line item funding for these projects and instead will attempt to use a combination of Readiness in Technical Base and Facilities and other Facilities and Infrastructure funding sources to replace corroded lead-ins and obsolete UV detectors. The memo requested a briefing from PXS0 within 90 days to address the specific scope, schedule, and prioritization for these projects.