

## DEFENSE NUCLEAR FACILITIES SAFETY BOARD

November 20, 1998

**TO:** G. W. Cunningham, Technical Director

**FROM:** M. T. Sautman

**SUBJECT:** RFETS Activity Report for Week Ending November 20, 1998

**RFFO Personnel Changes.** Effective November 23, Keith Klein will be acting manager for the Carlsbad Area Office. This assignment is expected to last between 3 and 5 months. David Lowe will be acting RFFO deputy manager for technical programs during this period.

**RFFO Radiation Protection Oversight.** Based on the Site Rep's field observations and review of relevant assessments and RWP login data, the Site Rep has raised concerns with the RFFO Deputy Manager and Assistant Managers that most of RFFO's radiological protection personnel and health physicists are spending little, if any, time in the field evaluating radiological controls and practices. The Assistant Managers of Performance Assessment and Engineering met with the Site Rep to discuss actions they plan to take since they also recognize this problem. The plans include placing these people in field teams that will be assigned to oversee certain activities and possibly adding performance appraisal criteria for visiting the buildings at a minimum frequency. The Site Rep will follow this closely to see if there is an improvement.

**Facility Representative Reorganization.** The Performance Assessment Assistant Manager discussed his preliminary plans for reorganizing the facility representative (FR) program with the Site Rep. (This idea has not been approved yet). Rather than having multiple FRs assigned to each of the plutonium facilities, only the "core" facilities (buildings 371, 707, 776/777) would have resident FRs. "Closure" buildings such as B779 and possibly B771 would not have resident FRs. The remaining FRs, along with various subject matter experts, would be assigned to field teams (see previous section) which would oversee activities at the "core" and closure facilities and perform horizontal assessments. Site activities would be prioritized based on hazards, maturity of activity, etc. The Site Rep has two concerns with this proposal. First, the Site Rep strongly believes that significant oversight is still needed for B779 and that resident FR(s) are needed for B771 because their deactivation and decommissioning activities (e.g., glovebox size reduction, tap & drain, piping removal) have major worker protection issues and a higher probability of surprises. Second, the Site Rep is worried that the field team FRs might end up residing in B460 with the rest of RFFO. Having a "home facility" for each floating FR would be beneficial so that they are in the field most of the time rather than in an office outside the protected area. As the Site Rep knows from personal experience, keeping on top of emerging issues is much more difficult if you are outside the facility.

The Site Rep has also received data showing the number of times that FRs assigned to either B771 or B559/707/776/777/779 have logged into the RFETS computerized RWP system during the last

year. This data is summarized in Appendix A. The data is somewhat misleading because it does not reflect any manual logins (e.g., B779) or identify when the FR was unavailable due to vacations, requalification, or other assignments. However, it does show that some FRs are not spending much time doing walkdowns or observing nuclear operations. The data also reveals that FRs are often assigned to tasks that take them out of the field for weeks/months at a time. The data is very consistent with the Site Rep's observations of who is observed in the field versus in their office and the FR's understanding of nuclear operations being performed in their building. The Site Rep plans to continue this tracking for all FRs assigned to plutonium facilities. Both this issue and the preceding one will be discussed with RFFO management and coordinated with the technical staff.

**Plenum Demister Test Proposal.** At RFFO's request, K-H has prepared a test plan to determine the amount of water passing through a demister during testing of automatic deluge systems. In addition, filter media will be analyzed afterwards to quantify the loss of tensile strength, if any, this moisture causes to HEPA filters. The samples will look at the following parameters:

- New filter media and media with a light dust loading
- Fog and curtain spray heads
- 1, 2, or 3 wetting cycles

K-H estimates that this testing could start next March and be completed by the end of September.

**Recommendation 94-1.** As discussed in the September 11, 1998 report, the Site Rep is trying to ensure that all actinide tanks and piping systems (not waste or just contaminated ones) are included in the Recommendation 94-1 Implementation Plan. RFFO has provided data on the actinide holdup and status for all the tanks in B774. Although some tanks are still being used, there are several tanks that are operationally empty, but not physically empty, which contain up to 280 g of Pu or U. Since this holdup is greater than that in some B371 and B771 systems, the Site Rep has asked RFFO whether they believe these tank systems should be part of the 94-1 tap and drain program.

**CDPHE Meeting.** Roy Kasdorf, John MacEvoy, Woody Cunningham and the Site Rep held a videoconference with representatives of CDPHE and the CO Attorney General's office to discuss how the Board and CDPHE would integrate Recommendation 94-1 and nonenforceable State residue milestones. CDPHE is willing to let the Board take the lead in overseeing residue activities at RFETS and negotiating milestones, but wanted assurance that we would continue to provide oversight in the future and that we would not agree to extending milestones that may be missed due to inadequate project management. The State appeared to be satisfied with the answers provided.

cc: Board members

## **Appendix A - Number of RWP Logins for B771 and B707/776/777/779 Facility Representatives (Designated A-J) by Month**

Month	# of Entries per Fac Rep									
	A	B	C	D	E	F	G	H	I	J
Oct-97	4	2	4	0	0	0	0	0	1	0
Nov-97	0	1	0	1	0	0	2	0	0	0
Dec-97	6	3	2	5	0	0	0	0	0	0
Jan-98	5	8	7	6	6	0	0	2	4	0
Feb-98	1	2	1	5	6	0	0	0	1	0
Mar-98	1	4	2	4	10	1	0	1	4	0
Apr-98	2	1	0	8	4	1	0	0	1	0
May-98	2	0	1	0	1	0	0	1	0	0
Jun-98	4	1	3	7	2	3	1	1	1	2
Jul-98	2	0	0	9	6	3	0	0	1	0
Aug-98	4	4	3	4	0	5	0	7	0	1
Sep-98	3	1	8	3	4	1	1	10	3	1

Note: This does not reflect manual logins (e.g., B779) or the length of each entry. It also does not identify when the fac rep was on vacation, going through requalification, or involved with a non-Fac Rep assignment.