

Testimony of Mr. Sean Dunagan  
Senior WIPP Recovery Manager  
DOE Carlsbad Field Office

Before the  
Defense Nuclear Facilities Safety Board  
Waste Isolation Pilot Plant (WIPP) Public Hearing  
Walter Gerrells Performing Arts & Exhibition Center  
Carlsbad, NM

April 29, 2015  
Session 2

Good afternoon, Mr. Chairman. I am Sean Dunagan, Senior WIPP Recovery Manager with the DOE Carlsbad Field Office (CBFO). Thank you for the opportunity to speak to you today regarding the progress we have made at CBFO relative to contractor oversight during recovery phase activities. As the Recovery Manager, one of my responsibilities is ensuring that there is sufficient review, direction and validation of recovery functions, as well as responses to Judgments of Need identified by DOE's Accident Investigation Board (AIB).

DOE is controlling the risk of activities to recover the underground and compensating when needed for safety deficiencies revealed by the accident investigations associated with the February 2014 events. Immediately following these events, work activities were curtailed, and underground access was restricted. Limited re-entry into the underground and subsequent limited work activities have been highly scrutinized (on a case by case basis) by DOE through the Evaluation of the Safety of the Situation process. DOE will continue to use this activity-based work screening approach until the new Documented Safety Analysis Revision 5 is fully implemented. Through this approach, DOE is able to adequately control the risks associated with the restart of waste emplacement operations.

Following the February events, the CBFO Manager also conducted an evaluation of CBFO's organizational structure to identify specific staffing needs related to line management, technical discipline, current oversight functions, and overall performance and effectiveness. As a result of that evaluation, the Office of Operations Oversight was established. The objective was to segregate operations, safety, engineering and environmental oversight for WIPP facility operations from programmatic production activities to enhance oversight independence, particularly through the recovery phase. The newly-established Office of Operations Oversight is developing and implementing a

new contractor oversight program that fully addresses the requirements of DOE O 226.1B, *Implementation of the Department of Energy Oversight Policy*. The program will ensure that processes for planning, conducting and documenting oversight evaluations of NWP programs and activities are developed; issues are evaluated and corrected to prevent recurrence and communicated to management in a timely manner; and CBFO oversight personnel are adequately qualified and trained to perform their oversight function. . The CBFO Manager, along with the Office Assistant Managers and Division Directors, will hold personnel accountable for implementation of the oversight program by revising position descriptions for their staff to identify expected oversight functions for the position.

In order to implement the necessary changes, the CBFO Manager has been authorized to hire 12 additional full time equivalents, including senior management, senior technical advisors and other positions with nuclear and industrial safety specialties

Additional steps the Department is taking to improve oversight include documenting the Environmental Management Headquarters Corrective Action Plans and the Carlsbad Field Office Corrective Action Plan, responding to the AIB's Judgments of Need. The Headquarters' plans identify 17 actions that will improve oversight. Some examples of these actions are the development of a new policy, including provisions to evaluate the status and closure of corrective actions from other agencies, and the development of corrective action procedures for implementation within EM-40, Office of Safety, Security, and Quality Programs. These procedures will specify the process for approval of corrective action plans and processes for tracking, trending and closure of corrective actions from EM-40 oversight activities. This will ensure a formal and consistent process is utilized for follow-up on EM-40 oversight activities.

The plan developed by CBFO identifies 25 specific actions that will improve oversight. Some of these actions include additional oversight of revisions to NWP-administered WIPP emergency response and operations procedures, which define roles for CBFO, Nuclear Waste Partnership, LLC (NWP) and Transportation Tracking and Communication System (TRANSCOM), and review and approval of NWP procedures for implementing the new Emergency Management Program plans necessary to ensure adequate flow-down of program requirements, including activation, notification, classification and categorization protocols. Additionally, CBFO Fire Protection and Ventilation Safety Systems Oversight

will ensure NWP has fully analyzed credible underground fire scenarios through review of the NWP Fire Hazard Analysis, the Baseline Needs Assessment and Emergency Planning Hazard Assessment.

Finally, I believe it is important to note that prior to the resumption of waste emplacement operations the Department will conduct a full Operational Readiness Review. This review will ensure readiness of facility and personnel to re-start the facility within the bounds of acceptable risk defined by the Safety Basis Authorization and ensure the facility has adequate Safety Management Programs implemented and sufficient controls in place to start waste emplacement operations within those bounds.