

## DEFENSE NUCLEAR FACILITIES SAFETY BOARD

May 8, 2020

**TO:** Christopher J. Roscetti, Technical Director  
**FROM:** Matthew Duncan and Brandon Weathers, Resident Inspectors  
**SUBJECT:** Oak Ridge Activity Report for Week Ending May 8, 2020

**COVID-19:** CNS personnel continued preparing facilities and work areas to support entering the second stage of the COVID-19 recovery plan (see 5/1/20 report). During the second stage, most personnel required to support facility operations and projects will return to Y-12, although some will continue to telework. The newly returned onsite personnel will begin executing area specific checklists and subsequently resuming normal operations in all major facilities. In preparation for a larger onsite population, CNS changed the configuration of work and meeting areas to promote social distancing. NPO plans to increase its onsite presence during the second stage and also allow many employees to continue to telework where possible.

As part of the preparatory activities to resume operations, CNS engineering personnel reviewed calibrations, equipment testing and inspections (ET&Is), and preventive maintenance activities that were not completed during the reduced mission critical operations phase or that had upcoming due dates in May. CNS personnel used the results of this review to issue a non-conformance report that allows a 90 day deferral of ET&Is and preventive maintenance for some of those activities. CNS subject matter experts determined that over 500 ET&Is and 2000 preventive maintenance activities were appropriate for deferral based on requirements from associated industry codes and standards, safety basis requirements, and equipment condition. The subject matter experts also determined that deferral was not appropriate for numerous activities and provided this information to the appropriate organizations for prioritization and scheduling. CNS issued a standing order that authorized continued use of ET&I tested and inspected equipment past the equipment expiration date per this non-conformance report. CNS will handle deferrals for instrument calibrations according to the process defined in the site integrated quality manual. The site integrated quality manual requires a technical evaluation of the calibration history documentation to determine whether to grant an extension.

**Nuclear Criticality Safety:** CNS provided a recommended path forward to NPO regarding occurrence reporting for nuclear criticality safety events. CNS developed this plan in response to NPO rejecting CNS' closure of an assessment finding on this topic (see 3/27/20 report). CNS plans to work with NPO in requesting guidance from the NNSA Central Technical Authority on application of existing occurrence reporting criteria in DOE Order 232.2A, *Occurrence Reporting and Processing of Operations Information*. CNS and NPO also plan to pursue ongoing efforts with the DOE Nuclear Criticality Safety Program to propose changes to DOE Order 232.2A related to guidance for nuclear criticality safety reporting categories. In the interim, CNS will continue to apply the Y-12 site-specific guidance on reporting criteria for nuclear criticality safety events. In the transmittal letter, CNS stated that a literal interpretation of the occurrence reporting criteria would lead to many documentation-only discrepancies being treated as a near-miss type safety event. CNS and NPO used a similar approach with DOE Order 420.1C, *Facility Safety*, to obtain a Central Technical Authority position on how to demonstrate subcriticality for design basis events (including natural phenomena hazard events) in legacy facilities (see 7/26/19 report).