## DEFENSE NUCLEAR FACILITIES SAFETY BOARD

September 7, 2007

TO:

J. Kent Fortenberry, Technical Director

FROM:

R. Todd Davis/Donald Owen, Oak Ridge Site Representatives

**SUBJECT:** 

Activity Report for Week Ending September 7, 2007

A. Oxide Conversion Facility Restart. As reported last week, BWXT proposed in a Startup Notification Report (SNR) submission that a contractor Readiness Assessment (RA) be performed to confirm readiness for the pending restart of the Oxide Conversion Facility (OCF). BWXT noted that a contractor RA is considered appropriate even if restart does not occur until after late-September (i.e., after more than 12 months since the September 2006 shutdown). This week, YSO approved the SNR submission.

DOE Order 425.1, Startup and Restart of Nuclear Facilities, and other directives state that nuclear facilities are "...activities or operations that involve radioactive and/or fissionable materials in such form or quantity..." The Order requires contractor and DOE Operational Readiness Reviews (ORRs) for restart of a nuclear facility following a shutdown of more than 12 months. BWXT management noted to the site reps. that contractual, supplemental guidance to DOE Order 425.1, issued by YSO, provides a definition of nuclear facility as a building or structure as covered by an Authorization Agreement when determining need for an ORR. As the OCF is a portion of the operations within the Enriched Uranium Operation Building, BWXT did not propose an ORR. YSO indicates in their SNR approval letter that a recent Implementation Validation Review and the minor changes to procedures, equipment and training since the shutdown are mitigating factors supporting approval of a contractor RA. YSO management does not intend to obtain an exemption to performance of ORRs for OCF restart.

- B. Quality Evaluation Relocation. BWXT is currently relocating the octagonal glovebox from the Quality Evaluation Building to the Assembly/Disassembly Building (see the 6/15/07 site rep. report). This week, the site rep. observed relocation of the lathe section of the glovebox, which was the final glovebox section to be relocated. Leak testing of the main octagonal portion of the glovebox indicates that integrity was maintained during the move. Glovebox reassembly and facility modifications to provide glovebox support are in progress and expected to be complete in May 2008. Quality evaluation operations in the octagonal glovebox are expected to resume in late-2008.
- C. <u>Depleted Uranium Operations</u>. As a part of Y-12 modernization, the Depleted Uranium Operations Consolidation Project will relocate numerous depleted uranium operations into Building 9212 and adjacent buildings. This project includes replacement of aging equipment (e.g., furnaces and crucible cleaner) and will modernize and restore Y-12's depleted uranium processing capability. In addition, relocation of these depleted uranium operations from Buildings 9201-5 and 9204-4 will allow decommissioning of these buildings. YSO is currently evaluating the Project Execution Plan. Existing depleted uranium operations in Building 9212 and adjacent buildings are currently addressed in both the Building 9212 and 9215 Documented Safety Analyses (DSAs); however, BWXT recently submitted a safety basis strategy that proposed consolidation of safety basis coverage for these operations in the Building 9215 DSA. YSO approved this strategy last week.