DEFENSE NUCLEAR FACILITIES SAFETY BOARD

April 22, 2005

MEMORANDUM FOR: J. K. Fortenberry, Technical Director

FROM: Michael J. Merritt, DNFSB Site Representative SUBJECT: Lawrence Livermore National Laboratory Report for Week Ending April 22, 2005

Plutonium Facility Resumption Strategy: The National Nuclear Security Administration (NNSA), the Livermore Site Office (LSO) and LLNL have reached preliminary agreement regarding the approach to resumption of activities in the Plutonium Facility. Currently, the facility is in a "stand-down" and activities are being authorized on a case-by-case basis. The preliminary agreement provides a path forward that is intended to first return the facility to limited operations, then to full program operations. The strategy relies on LLNL's ability to effectively integrate corrective actions into a comprehensive plan.

LLNL has agreed to provide NNSA/LSO with a project management plan no later than May 18, 2005. The plan is required to include resource requirements and schedules that will become the management tool for implementing facility resumption. Presumably, the plan will include activities that implement compensatory measures, corrective actions, and recovery plans for the facility's Technical Safety Requirements (TSRs). LLNL and LSO have agreed on the need to enter into a Memorandum of Understanding that will clearly identify the requirements and process for resumption of programmatic operations. All parties have also agreed that once the plan is completed, a change control process will be required to ensure that any changes to schedule priorities and issue resolution are approved by NNSA/LSO and LLNL.

A key element of the resumption process is the determination of readiness. The process to confirm readiness has been agreed to and will occur twice. First for resumption of limited operations, and than again for full resumption. The readiness review processes will include a Management Self Assessment (MSA) by LLNL and a Readiness Assessment (RA) to be performed by LLNL and LSO. The MSA plan is currently being developed and will include support from expert consultants. The goal of the MSA is for the facility line management to ensure that the Safety Analysis Report requirements, TSR controls, and associated Administrative Control Programs (ACPs) are effectively implemented and that any deviations from these requirements are addressed with appropriate compensatory measures. LLNL previously provided LSO with recovery plans for ACPs that had been declared as TSR violations (see weekly report dated March 25, 2005).

Each RA will be conducted in accordance with DOE Order 425.1C, *Startup and Restart Of Nuclear Facilities*. LLNL implementation of the order requirements is defined in LLNL's Environment, Safety, and Health Manual, Document 51.4. LSO's implementation of the order is contained in an LSO/NNSA Standard Operating Procedure. Recently, the site representative provided LLNL and LSO with comments on both documents. The comments are being addressed to ensure that the implementation of the RA is fully compliant with the order.

The schedule for limited resumption has not been finalized, but it appears that the initial MSA could be performed in May followed by an RA in late June. On this schedule, the limited resumption will likely rely on compensatory measures to ensure adequate safety basis implementation. LLNL has indicated that prior to resumption of full program operations, the safety basis will be implemented fully and compensatory measures will be unnecessary.