DEFENSE NUCLEAR FACILITIES SAFETY BOARD

December 1, 2006

MEMORANDUM FOR: J. K. Fortenberry, Technical Director
FROM: A. Matteucci, Acting DNFSB Site Representative
SUBJECT: Report for Week Ending December 1, 2006

Activity Summary: Michael Merritt was on leave for the week. Al Matteucci was on site to provide support to the DNFSB site office.

Proposed Technical Safety Requirement (TSR) Revision: In a November 16, 2006, letter, the LLNL Nuclear Materials Technology Program (NMTP) requested Livermore Site Office (LSO) approval to change a limiting conditions for operation (LCO) to specify that only one room continuous air monitoring system (CAMS) is required to be operable. The LCO is in the Title 10 of the Code of Federal Regulations Part 830, *Nuclear Safety Management* (Rule), compliant technical safety requirements (TSRs) which are being implemented. The LCO currently states that if a room continuous air monitor is not operable, the room must be placed in the standby mode within 2 hours. The safety-significant function of the room CAMS is to detect airborne radioactive contamination and alert personnel. The proposed change acknowledges a potential reduced promptness in generating a CAMS alarm due to the possible increase in time for the radioactive material to arrive at the operable CAMS. The request states that the proposed change is needed so that the planned maintenance activities would not result in a degraded safety system or a requirement to enter an LCO condition. The request does not propose any limitation on the duration of the planned maintenance activities nor to the types of operations allowed when only one CAMS is operational. Although the NMTP letter requests a response by the end of November, LSO is still evaluating the requested change.

Fire Dampers in the Plutonium Facility. In a November 22, 2006, letter LSO granted LLNL relief from the surveillance requirement (SR) for testing ten inaccessible fusible link fire dampers in the Plutonium Facility. The Rule compliant TSRs for the Plutonium Facility, currently being implemented, do not contain a SR for the inaccessible fire dampers. The bases for granting the relief from the testing of the inaccessible dampers include the estimated high cost and the extensive down time to access or relocate the ten inaccessible dampers.

An evaluation by LLNL of the possible consequences of the inaccessible dampers to either operate inadvertently or fail to operate when needed identified one inaccessible damper to have an unacceptable consequence. The evaluation states that the inadvertent operation of one particular fire damper would stop the entire exhaust stream and could over pressurize the glove boxes. LLNL proposed a modification to the one damper of concern to prevent its inadvertent closure. In the subject letter, LSO requested a plan and schedule by June 1, 2007, to address LLNL's proposed modification. In a separate correspondence from early November, LSO requested that LLNL evaluate the inadvertent operation of the particular fire damper of concern as a possible potential inadequacy in the safety basis. Recent inspection of accessible dampers in the Plutonium Facility and evaluation of the history of inadvertent operation of dampers have not indicated a concern for inadvertent closure of the one damper prior to its proposed modification by LLNL.