

DEFENSE NUCLEAR FACILITIES SAFETY BOARD

August 6, 2004

MEMORANDUM FOR: J. Kent Fortenberry, Technical Director
FROM: C. H. Keilers, Jr.
SUBJECT: Los Alamos Report for Week Ending August 6, 2004

Andrews and Nichols were here this week reviewing resumption and safety basis activities.

LANL Resumption Status: LANL has divided resumption of low-risk activities (i.e., risk level 1) into 348 projects and resumed about 80 % of these as of Friday morning; several nuclear facilities have not yet achieved level 1 resumption. Both the NNSA Los Alamos Site Office (LASO) oversight plan and the LANL resumption plan have been approved and issued. The LANL plan defines the process for verifying functional and organizational readiness to resume moderate and high hazard work (risk levels 2 and 3). The plan is based on LANL institutional startup/restart requirements, which were derived from DOE Order 425.1, *Startup and Restart of Nuclear Facilities*.

LANL plans to verify moderate risk activities through management self-assessments (MSAs); higher risk activities will receive both MSAs and lab readiness assessments (RAs). The assessments will focus on management competence, personnel behavior; work control (ISM); training and qualification; security; environmental protection; facilities/infrastructure; and authorization basis. LANL management will separately assess personnel culture by one-on-one interviews. To ensure quality and consistency, line management and assessment teams are receiving RA-focused training, and LASO and the LANL Performance Surety Division (which has institutional responsibility for the RA process) will have representatives on each assessment team. LANL infrastructure (e.g., health and safety, on-site transportation, waste operations) have priority for early assessments.

Before each assessment, its scope will be reviewed by the LANL Resumption Review Board (RRB) and approved by the LANL Director and LASO. After each assessment, the RRB will review and concur in the team's findings, as well as line management's resource-loaded corrective action plan and recommendation to proceed. A new Issue Review Board, which has authority to prioritize lab-wide resources, will increase focus on managing the findings and issues. The LASO Manager will separately concur in resumption based on input from his representatives on each assessment team and on the RRB. The LANL Director is the approval authority for resumption for non-CREM activities.

Plutonium Facility (TA-55): This week, LASO approved a safety analysis for packaging 39 seal-welded cans of Pu-oxide into 8 DOT Type B shipping containers and approved with DOE-EH concurrence an exemption from DOE readiness verification requirements (DOE O 425.1) for this activity. Four or five cans will be slipped into an inner shipping container that will then be rotated to vertical, mechanically capped, and slipped into an outer over-pack. The operation will be done using a reader-worker approach under senior supervisory watch. It requires 2 lifts of the loaded inner container, which will be controlled as critical lifts. NNSA pursued the exemption to support the MOX Program schedule and was not specific on which DOE O 425.1 requirements were waived. This type of operation would normally have had an MSA and an RA. LANL is performing a formal, rigorous verification. NNSA and LANL senior managers are walking down the process. LANL may load the first shipping container next Thursday.

Authorization Basis (AB): There is no discernible improvement in the AB preparation/review process since the staff's review last Oct or as a result of the Board's May 27th letter. LASO attributes previous issues to LANL lack of compliance with existing requirements and to insufficient federal resources. Better balanced priorities and a planned, resource-loaded, well-executed improvement effort are needed.