## DEFENSE NUCLEAR FACILITIES SAFETY BOARD

October 1, 2004

**MEMORANDUM FOR:** J. Kent Fortenberry, Technical Director **FROM:** T. D. Burns Jr. and C. H. Keilers, Jr.

**SUBJECT:** Los Alamos Report for Week Ending October 1, 2004

Keilers was at DNFSB-Headquarters in Washington D.C. Monday through Wednesday. Jordan and Burnfield were on-site this week augmenting site-rep coverage of resumption activities.

**Resumption Status:** Field work for the Weapons Engineering Tritium Facility (WETF) lab readiness review (LRR) is complete. The LANL Resumption Review Board (RRB) is currently reviewing management self-assessment (MSA) reports for TA-55 (including Pu-238 operations), CMR, LANSCE, the TA-8-23 radiography facility, the site services contractor (KSL), and moderate-risk TA-50 and TA-54 waste operations (including WIPP drum characterization). Pending RRB concurrence, LRRs for some of these activities – particularly TA-55 and CMR – may begin next week.

Critical Experiments Facility (TA-18): LANL has reported closure of the material-at-risk issues that led to the pause in most TA-18 operations on July 9<sup>th</sup> (site rep weekly, 7/16/2004). TA-18 has resumed handling Security Category III/IV material and is conducting an MSA for operations involving critical experiments and Security Category I/II materials. On Wednesday, TA-18 made its first shipment of nuclear material to the Nevada Test Site Device Assembly Facility. This shipment consisted of Category III/IV material. The evolution was not without incident. While entering TA-18, the transport truck severed a low-hanging low-voltage overhead line that was not installed to the proper height. Future shipments will require spotters to ensure adequate clearance until the facility raises the low-hanging lines. Lessons-learned will be promulgated lab-wide.

**Authorization Basis (AB):** On Monday, NNSA approved the revised LANL unreviewed safety question (USQ) procedure submitted last week (site rep weekly, 9/24/04). As a condition-of-approval, NNSA has imposed an interim policy on verification of safety control implementation. Under this interim policy either a readiness assessment or an operational readiness review shall be performed when a new documented safety analysis (DSA), technical safety requirement (TSR), or USQ does any of the following: identifies new safety-related equipment; significantly affects facility procedures; requires new training or retraining of facility personnel; or significantly modifies a facility's design baseline. Only the NNSA Site Office Manager has the authority to waive these requirements. Implementation details for the interim policy are to be developed.

**TA-54 Waste Operations:** During a recent resumption-related walk-down, NNSA observed approximately 1,000 Type 7A 85-gallon over-pack drums stacked three-high in one dome. The most recent AB for transuranic waste storage, approved in November 2003, precludes stacking these drums three-high because they are not certified for that drop height. The previous AB allowed stacking up to five-high. Confusion over the new AB's implementation schedule led the facility to conclude that the new AB requirements would not take effect until November 2004. Potential operational impacts due to space constraints and safety concerns with quickly moving a large number of drums have led to questions about the practicality of meeting the November deadline for un-stacking. LANL and NNSA are working on a path forward, which will likely involve accepting the current configuration in the short-term and committing to un-stacking the drums as a priority as space becomes available.