## DEFENSE NUCLEAR FACILITIES SAFETY BOARD

TO: J. Kent Fortenberry, Technical Director
FROM: Paul F. Gubanc and David T. Moyle, Oak Ridge Site Representatives
SUBJ: Activity Report for Week Ending June 1, 2001

Staff members Fortenberry, McConnell, and Helfrich accompanied the Board on a visit to Y-12 on Thursday to meet with BWXT Y-12 and NNSA representatives. Staff member Dwyer was on site all week observing the Y-12 Disassembly Readiness Assessment. Monday was a plant holiday.

A. <u>Y-12 Disassembly</u>: The NNSA Readiness Assessment (RA) for the new disassembly campaign began on Tuesday. Field observations were delayed two days by discovery of a broken lanyard and missing balllock pin on a required lifting fixture. The fixture was eventually re-certified for use, but the re-certification process did not comply with either the DOE or Y-12 hoisting and rigging standards. The inspection also raised questions as to the independence and qualification of the site equipment inspectors (e.g., both operations personnel and a conduct of operations mentor provided direction to the inspector as to the scope and conduct of the re-certification).

Difficulties with the disassembly process itself also slowed the demonstrations, as did an apparent failure to be fully ready to demonstrate all aspects of the disassembly procedure [start-to-finish]. Therefore, the RA will continue into next week. The NNSA RA team appears to be conducting a thorough review within the scope of the approved plan of action, and is developing a number of significant findings and observations. Several items beyond the scope of the RA plan of action, however, deserve scrutiny. For example, the plan of action excludes any examination of NNSA roles, responsibilities, and qualifications. (The Facility Representative is new and only interimly qualified at present.) It also does not currently examine either the safety or operational implications of conducting this new campaign concurrent with other ongoing campaigns or the readiness of support organizations to handle the material flows generated by this campaign. (2-A)

B. <u>Y -12 Training</u>: On May 23, BWXT implemented a revision to the Y-12 training procedure which restricts the definition of "control manipulations," used for nuclear operator certification exams, to those operations which "potentially affect the protection of health and safety of workers *against a criticality accident* (emphasis added)." Using this narrower definition, BWXT is removing existing control manipulations from Y-12 operator certification requirements. We believe BWXT's definition violates DOE Order 5480.20A which does not restrict itself solely to the hazards of criticality. We continue to discuss our concerns with BWXT and NNSA. (1-C)

C. <u>Transuranic (TRU) Waste Facility</u>: On May 30, Messrs. Fortenberry and Gubanc toured the construction site for the Foster-Wheeler TRU waste treatment facility. The DOE-ORO project manager advised that due to the lack of an adequate preliminary safety analysis report (PSAR) and fire hazards analysis (FHA), DOE had previously only released the contractor to place rebar and move earth. (This matter was discussed in a Board letter to DOE dated May 10, 2001.) DOE then indicated that the PSAR and FHA had now received its review and comment and that DOE authorization to place concrete was expected within the next couple weeks. These documents have not been shared with the Board staff. We suggested to DOE that they expeditiously share these documents with the staff to reduce the possibility of major concerns being identified after concrete placement commenced. (3-A)

cc: Board Members