

DEFENSE NUCLEAR FACILITIES SAFETY BOARD

November 30, 2001

TO: J. K. Fortenberry, Technical Director

FROM: D. F. Owen, RFETS Site Representative

SUBJECT: RFETS Activity Report for the Week Ending November 30, 2001

Plutonium Stabilization and Packaging System (PuSPS). Operations were interrupted twice this week due to failure of equipment used to detect helium leakage during inner can leak checks. As a result, much of PuSPS operations this week were limited to reworking DOE-STD-3013 containers previously rejected for outer can weld failures. At week's end, the leak check equipment was under evaluation. (3-A)

Plutonium Fluoride Residue Repackaging. DOE-RFFO informed the site rep. that repackaging of plutonium fluoride residues for disposal under Recommendation 94-1 has been completed by Kaiser-Hill. The fluorides were blend-down and repackaged into robust pipe overpack components thereby reducing the risk from these higher concentration, higher-hazard RFETS residues. (3-A)

Occurrence Reporting and Requirements Management. During a review of the RFETS manual covering occurrence reporting, the site rep. was informed that the manual had been revised in late October to eliminate three categorization criteria for occurrences dealing with degradation of safety structures, systems and components (SSCs). DOE Order 232.1A, *Occurrence Reporting and Processing of Operations Information* and its accompanying DOE Manual 232.1-1A require that these categorization criteria, among others, be used.

When the site rep. asked DOE-RFFO management about the basis for eliminating the criteria, the following documentation was provided:

- An exemption request from DOE-RFFO to the DOE Office of Environmental Management (EM) dated August 23, 2001.
- DOE-RFFO "approval" of a revised manual page eliminating the categorization criteria for SSC degradation. This approval was provided on October 5, 2001. (At that time, no formal DOE-EM response to the DOE-RFFO August exemption request had been provided.)
- DOE-EM's response to the August exemption request dated October 16, 2001. (This response does not approve the request but asks DOE-RFFO to consider options to an exemption.)

As of this report, DOE-RFFO has not withdrawn their earlier approval. This documentation has been provided to the Board's staff. The site rep. will follow-up on this issue. (1-C)

cc: Board Members