

## DEFENSE NUCLEAR FACILITIES SAFETY BOARD

April 23, 1999

**TO:** G.W. Cunningham, Technical Director  
**FROM:** Paul F. Gubanc, Oak Ridge Site Representative  
**SUBJ:** Activity Report for Week Ending April 23, 1999

Staff member Tim Hunt and Outside Expert Bob Lewis were at ORNL observing the DOE Phase-1 Integrated Safety Management System (ISMS) verification which started this week.

A. ORNL ISMS Phase-1 Verification: Key observations regarding ORNL ISMS and DOE review:

1. ORNL is organized into five major directorates (and other offices) which are further divided into 25 divisions. Unlike the directorates, many of the divisions have been in existence for several decades. Division Directors are the keys to implementing any change.
2. The ORNL ISMS Description is composed of one lab-wide "program description" which is then further supported by 32 division and facility-level "ISMS Plans." Each of these plans is tailored to the division/facility's needs and so a complete ISMS Description for ORNL must include the "program description" as well as each subordinate plan.
3. Development and implementation of ORNL ISMS is guided by an ORNL Steering Committee which includes several senior Division Directors (i.e., line managers), organized labor, and DOE-ORO as members. This committee is widely regarded as the key to getting the ORNL Division Directors to "buy into" ISMS though it does not exercise any formal authority.
4. Last December, ORNL self-identified ten major "gaps" requiring resolution to implement ISMS. While laudable, the gaps cover many critical aspects of ISMS implementation (e.g. requirement flowdown, worker involvement, roles & responsibilities). Closure of the gaps is due to complete by September 1999; when ORNL is to be ready for Phase-2 verification.
5. Based on interviews of senior ORNL managers, the principles of ISMS are well understood by them though implementation is largely a matter of trust and peer pressure. Management directives are expected to be carried out with minimal tracking or verification.
6. Due to the multiple ISMS plans described above, the DOE verification team (24 members) was hard-pressed to ascertain a complete picture in only one week. Over 200 interviews were scheduled, leaving little time for document reviews and verification of ORNL assertions. Some reviewers were observed to merely work off the checklist of criteria, paying little attention to the responses being given. We discussed our concerns with the team's thoroughness with the team leader. Mr. Lewis and I will follow up next week.

Next week the team will finalize its report and ORNL will review it for factual accuracy. Issuance of the draft report and exit briefing are expected on April 30. (I-A.2.)

B. Emergency Management: This week, it was confirmed to me that the 800-number "nationwide" pager service I depend upon is unreliable on the Oak Ridge sites due to poor area coverage. Effective Friday, I have converted to a local "wide-area" pager which is much more reliable. Since pagers are extensively depended upon for emergency response, I inquired as to the pagers used by emergency responders. LMES, the Y-12 and ORO overall emergency response coordination contractor, has informed me that they were aware of the pager problem, as a practice do not permit LMES emergency responders to depend upon 800-number pagers, and that DOE-ORO is aware of the problem. I am continuing to follow up, since many of the senior DOE-ORO managers, and even the DOE Emergency Management Director, currently utilize 800-number pagers. (I-B.)

cc: Board Members