

DEFENSE NUCLEAR FACILITIES SAFETY BOARD

November 13, 1998

TO: G.W. Cunningham, Technical Director

FROM: Paul F. Gubanc, Oak Ridge Site Representative

SUBJ: Activity Report for Week Ending November 13, 1998

Staff member Don Owen and Outside Expert Ralph West were at Y-12 this week to observe the DOE ORR of Enriched Uranium Phase A2. I was absent from the office Wednesday and Thursday.

A. Y-12 Enriched Uranium (EU) Phase-A2: The DOE Operational Readiness Review (ORR) for EU Phase-A2 started this week. The Phase A2 processes observed by the ORR demonstrated satisfactory conduct of operations and the ORR team noted significant improvements in the conduct of evolutions since Phase A1. The ORR team is considering findings in the following areas:

1. Inspection and storage of materials - control of the flame-retardant baghouse filters is extremely poor and the possibility of an error during installation is high.
2. Radiological control practices - some work practices do not stress contamination control.
3. System status control - one evolution could not be completed as planned due to an undetected misalignment of the nitric acid system.
4. Lack of progress on Phase-A1 post-start findings - the maintenance backlog has increased, criticality safety evaluations are still poorly documented, and the drill program is still weak. Each of the above Phase-A1 post-start findings may also be reiterated as Phase-A2 findings.
5. Facility condition program - not in accordance with the Maintenance S/RID requirements.
6. Westfalia centrifuge readiness - this Phase-A2 system is not materially ready to operate and still requires criticality safety feature verification, replacement of degraded labels and inoperable components, and operational demonstration.

The ORR team currently plans to conclude the review on November 18.

B. Y-12 Administrative Control Tags: Y-12 currently utilizes two separate lock and tag programs: a "Lockout/Tagout" (i.e., Danger tag) program for personnel protection; and an "Administrative Control Tag" (ACT) program which is used for all other occasions when a lock or tag is desired. The Building 9212 Lockout/Tagout program has been reviewed previously by the ORR's of EU whereas the ACT program has not. My review of 9212's ACT program identified the following:

1. Building 9212 currently has approximately 180 active ACT permits totaling over 700 individual tags. Fifteen (15) errors associated with active permit status were identified.
2. ACT tags are used to control system lineup, control untested, inactive or deficient equipment, identify inadequate labeling, and implement administrative controls for criticality safety.
3. The ACT procedure and permit does not require the desired position of the component to be identified nor does it specify which tags are to include locks. Out of position components cannot always be identified by referring to the tag or permit.
4. Several instances were noted where permits overlapped, were redundant or isolated equipment in a fragmented manner (i.e., several permits for the same system).
5. There were no instances found where health and safety were jeopardized.

LMES is developing replacement procedures for both the Lockout/Tagout and the ACT programs and intends to issue them by December 15, 1998.

cc: Board members