## DEFENSE NUCLEAR FACILITIES SAFETY BOARD

March 12, 2010

**TO**: T. J. Dwyer, Technical Director

**FROM:** W. Linzau and R. Quirk, Hanford Site Representatives

**SUBJECT:** Hanford Activity Report for the Week Ending March 12, 2010

Office of River Protection (ORP): The ORP manager used outside experts to assess their oversight systems and concluded that significant improvements were made since a similar assessment was performed during the months after the waste spill at S-102, but improvements are still needed. The key issues raised are: ORP has failed to develop an effective system for technical oversight, and management response to contractor performance problems identified by the ORP assessors (specifically radiological protection practices) was too slow. The assessment team also noted the internal oversight and self-assessment programs are ineffective.

Tank Farms: Two weeks ago, ORP accelerated the planned detailed assessment of the radiological protection program in response to the independent assessment noted above. The goal was to determine if the contractor had adequately resolved the issues previously noted by facility representatives and subject matter experts. The assessment team identified a number of issues, including: inadequate implementation of the corrective action program, failure of supervisors to identify and correct poor radiological control practices, inadequate implementation of requirements for radiological work planning, and weaknesses in training. The team expects to complete their assessment next week. This week, midway through the assessment, ORP sent a letter to the contractor noting their concern with the widespread problems and required the contractor to submit a comprehensive corrective action program within 15 days. ORP also noted they will perform an ISMS effectiveness review later this year during the annual ISMS declaration process.

Waste Treatment Plant: ORP directed the contractor to remove wording from the Pretreatment facility PDSA Addendum that were interpreted by the contractor to allow future downgrades of safety-significant (SS) components without specific ORP approval. The wording in the addendum indicated that reclassification below SS could not be done until evaluations of worker safety and defense-in-depth considerations were complete. The contractor interpreted this as meaning that, once the evaluations were complete, the reclassification could occur without further ORP approval (see Activity Report 1/8/10). The direction provided to the contractor clearly indicates that all reclassification of components below SS require ORP approval.

Plutonium Finishing Plant: The contractor is changing their approach for removing the pencil tanks from the Plutonium Reclamation Facility (PRF). The new approach is to manually cut the tanks into pieces and remove them from the canyon through an existing port. Contractor project managers told the site reps this activity could start as soon as this month, but the most recent Startup Notification Report (SNR) submitted to the Richland Operations Office (RL) noted that the contractor startup review would be in May and further evaluation is required to determine if a formal readiness review will be required. RL had determined that a Readiness Assessment (RA) was required for this activity in 2005, but the field work was not started after completing the RA when project priorities changed (see Activity Report 9/23/05). The SNR identifies that the required readiness will be determined by the Joint Evaluation Team (JET), which is a new process to aid the contractor in proposing better recommendations on the level of readiness reviews to RL (see Activity Report 11/13/09).