

DEFENSE NUCLEAR FACILITIES SAFETY BOARD

October 1, 2010

MEMORANDUM FOR: Timothy Dwyer, Technical Director
FROM: Jonathan Plaue, DNFSB Site Representative
SUBJECT: LLNL Activity Report for Week Ending October 1, 2010

DNFSB Staff Activity: On September 29, 2010, the staff held a conference call with Livermore Site Office (LSO), Carlsbad Field Office, Department of Energy (DOE) Office of Environmental Management, and Laboratory personnel to discuss implementation of the *Contact-Handled Transuranic Waste Packaging Instructions* at LLNL.

Tritium Facility: Last week, the Laboratory conducted a readiness assessment (RA) for the modifications made to the Tritium Process Station. The RA identified two findings: (1) the need to complete table top training for use of cryogenics (pre-start) and (2) the need to formally document the process for activity execution planning (post-start). Facility management resolved the pre-start finding, developed a corrective action for the post-start finding, and requested authorization to commence radiological operations on September 29, 2010. This RA represented the first effective use of a single integrated checklist format at LLNL. LSO shadowed the RA and found the conduct by the review team and the level of readiness demonstrated by the facility and program to exceed expectations.

Startup and Restart: In a letter dated September 29, 2010, the Laboratory requested an extension until April 30, 2011, for implementation of DOE Order 425.1D, *Verification of Readiness to Startup or Restart Nuclear Facilities*. The Order mandated implementation by October 13, 2010. As an interim measure, the Laboratory's proposed additional startup subject matter expert involvement in the nuclear facility change control processes in order to facilitate appropriate readiness review determinations. Of note, the letter stated that the minimum expected duration for revision of an institutional-level procedure is four months. LSO and Headquarters are expected to approve the extension request.

Work Planning and Control: In a letter dated September 30, 2010, the Laboratory responded to the LSO direction dated August 31, 2010, regarding work planning and control (see weekly report dated September 3, 2010). The letter included an attachment from the Nuclear Materials Technology Program (NMTP) Leader outlining actions taken in the nuclear facilities. On September 17, 2010, NMTP issued a standing order to ensure that the scope of work in activity-level work control documents was developed in sufficient detail. The order provided criteria from the Institutional Work Control Requirements Document to facilitate this effort. In addition, NMTP required all responsible individuals to complete a review of currently approved work control documents and receive Safety Office concurrence. A checklist with broad expectation statements was developed to facilitate and document this review. NMTP also instituted an enhanced Plan of the Day meeting for work to be performed under Operational Safety Plans (OSPs) that have not yet been updated. The meetings now include a daily review between the workforce and the programmatic manager to ensure the adequacy of the planned scope of work, hazards, and controls. Facility Safety Office personnel will initially attend these meetings and are expected to review the generated documentation.