

## DEFENSE NUCLEAR FACILITIES SAFETY BOARD

TO: Timothy Dwyer, Technical Director  
FROM: Wayne Andrews and David Kupferer, Site Representatives  
SUBJECT: Oak Ridge Activity Report for Week Ending March 4, 2011

**Uranium Processing Facility (UPF).** Last week, NNSA Headquarters—specifically, the Chief, Defense Nuclear Safety (CDNS)—provided YSO feedback from its review of the Safety Design Strategy (SDS) for the UPF project (see the 12/10/10 report). In general, the CDNS concluded that the UPF SDS is a comprehensive document that satisfies the intent of DOE Standard 1189, *Integration of Safety into the Design Process*. The CDNS noted that B&W’s development of a “Roadmap for Safety Design Basis Documents” is especially noteworthy and should serve as a benchmark for other NNSA nuclear construction projects (see the 9/3/10 report). The CDNS did identify a few areas for improvement including that the SDS should discuss (a) quality assurance requirements and how they will be applied to this project and (b) how a Code of Record will be established and maintained for UPF (see the 5/22/09 report). In addition, the CDNS noted that it has questions whether the UPF project team’s proposed treatment of chemical and toxicological hazards is consistent with DOE Standard 1189. Specifically, the SDS states that application of national consensus fire codes and standards provides an adequate control set for fire-initiated releases of toxicological materials and that consequences related to release of these materials during fire scenarios do not need to be specifically evaluated in safety basis documents. The CDNS has committed to work with YSO and DOE headquarters to resolve this issue.

**Building 9212 Facility Risk Review (FRR).** Last month, YSO and B&W jointly issued a team charter to reevaluate the recommendations and conclusions of the Building 9212 FRR conducted in 2006 (see the 2/18/11 report). The review team—which includes subject matter experts from YSO, B&W, and NNSA Headquarters—conducted two days of working meetings this week. The review team expects to issue its revision of the Building 9212 FRR report next month. The review team is also planning to revise the FRR reports associated with Buildings 9215 and 9204-2E; however, the schedule for revising these reports is still being determined.

**Unreviewed Safety Question Determination (USQD) Process/Criticality Safety.** This week, B&W requested YSO approval of a Standing Order that would limit applicability of the USQD Process to proposed revisions of criticality safety documents (e.g., Criticality Safety Evaluations). Specifically, the Standing Order would exempt proposed changes to criticality safety documents from the USQD process as long as those changes do not involve introduction of new controls or changes to existing controls. The site representatives note that the practical ramifications of this Standing Order appear to be allowing criticality safety personnel to determine the safety basis impact of proposed changes rather than qualified USQD reviewers.

**Line Oversight and Contractor Assurance Systems (LOCAS)/Governance Reform.** On Monday, NNSA issued a Policy Letter titled *Transformational Governance and Oversight*, the stated purpose of which is to identify the responsibilities, processes, and requirements that NNSA will utilize to transform and improve Federal governance and oversight of Management and Operating contractors. The policy includes a LOCAS validation/affirmation process and an Integrated Oversight and Assessment Model, which provide a framework for transitioning from a directive-based oversight model to a risk-informed/performance-based oversight model. Representatives of organizations throughout NNSA met at Y-12 this week to begin planning a review of Y-12’s LOCAS based on the review criteria identified in the Policy Letter. NNSA is planning to conduct this review in May.