

DEFENSE NUCLEAR FACILITIES SAFETY BOARD

March 14, 1994

MEMORANDUM FOR: Technical Director

COPIES: Board Members

FROM: R. E. Kasdorf

SUBJECT: Order Compliance Review of the DOE-Rocky Flats Office

1. Purpose: This report presents the results of a Defense Nuclear Facilities Safety Board (DNFSB) staff Order compliance review of the DOE-Rocky Flats Office (RFO). The review was conducted from February 22 - 24, 1994, by J. Arcano and R. Kasdorf.
2. Summary:
 - a. There does not appear to have been any significant change in the overall status of RFO Order compliance relative to resumption of Building 707 since the Board's deliberation in February 1993.
 - b. In late 1991, RFO completed a one-time administrative Order compliance evaluation for Building 559. RFO is currently updating their administrative Order compliance evaluation for those Orders that are new or have been revised since the 1991 evaluation. This update is being performed for RFO by a contractor and does not appear to be consistent or thorough. RFO does not have instructions or procedures for conducting administrative Order compliance evaluations.
 - c. RFO does not have an effective, systematic adherence Order compliance program. There was only limited evidence that any adherence assessments were performed.
3. Background:
 - a. In February 1993, the DNFSB deliberated on the proposed resumption of thermal stabilization operations in Building 707 and informed the Department of Energy that no Board recommendation, prior to resuming operations, was necessary to protect public health and safety.
 - b. DOE has not authorized resumption of operations in Building 707 pending the completion of an Environmental Assessment (EA). As a result of the EA, in February 1994, DOE-EH issued a Finding of No Significant Impact (FONSI). The FONSI eliminates the need for any further environmental assessment of the thermal stabilization process. DOE anticipates resumption of Building 707 thermal stabilization operations in the near future.

4. Discussion: In January 1994, the staff conducted a review to update the status of Order compliance in Building 707 since the February 1993 Board deliberation. This review included a cursory review of RFO order compliance. Based on this review, the staff felt a more comprehensive review was warranted. This review was conducted in February 1994 with the following findings:
- a. There does not appear to have been any significant change in the overall status of RFO Order compliance relative to resumption of Building 707 since the Board's deliberation in February 1993.
 - b. Administrative Order Compliance: In late 1991, RFO completed a one-time administrative Order compliance evaluation for Building 559. This evaluation covered the 43 Orders that were of interest to the Board at that time. RFO is currently updating their administrative Order compliance evaluation for those Orders that have since become of interest to the Board or have been revised since the 1991 evaluation.
 1. RFO does not have instructions or procedures for conducting administrative Order compliance evaluations.
 2. The update effort for administrative Order compliance was started in May 1993 and is being performed by a contractor (NFT, Inc.) to RFO. This contractor also performed the initial portion of the 1991 evaluation. The contractor has not been provided written instructions or procedures for conducting his evaluation. Based on discussions with the contractor, the process used does not appear to be consistent or thorough. For example,
 - (a) The process appears to rely heavily on discussions with line management. The contractor told the staff that he does not necessarily look for implementing documents, and that he readily accepts interpretations and comments from RFO personnel without objective evidence.
 - (b) The evaluation for DOE Order 5700.6C, Quality Assurance, only considered requirements listed under the Responsibilities and Authorities for the DOE Field Office Managers heading in the Order. The general requirements of the Order (e.g., the ten criteria) were not considered.
 - c. Adherence Order Compliance:
 1. RFO does not have an effective, systematic adherence Order compliance assessment program. There was only limited evidence that any adherence assessments had been performed.

2. RFO has issued a self-assessment instruction (RFI 7300, Rocky Flats Plant Self Assessment Program). This instruction requires RFO Assistant Managers to establish and maintain a self-assessment program that assesses all aspects of each functional and management area under their cognizance during a five-year period. The staff was told that Order compliance should be assessed as part of satisfying this instruction. Two divisions (Training and ES&H) had performed one-time reviews in accordance with this instruction. However, in general these assessments did not assess compliance to Orders, but rather, assessed whether RFO's oversight of EG&G was adequate. No other divisions had performed any self-assessments for Order compliance.
3. RFO's independent assessment group has issued a procedure for conducting self assessments; however, assessments were apparently not being performed due to higher priority work efforts.
- d. RFO's efforts are focused on providing oversight of EG&G to ensure that they are complying with Orders. RFO believes that self-assessments of their own compliance with Orders are secondary to their oversight role. Additionally, several managers indicated they believed that Order compliance was the independent assessment group's (Performance Assessment Office) job.
- e. The Performance Assessment Manager stated that he was attempting to improve the RFO self-assessment program and associate it with adherence Order compliance. However, no specific goals or schedules were presented.
5. Future Staff Actions: After RFO has developed and implemented a formal Order compliance program, the staff will assess the program relative to the DOE "Standards/Requirements Implementation Assessment Instruction," when it is issued. The staff will also review the updated administrative Order compliance review when completed by RFO.