

[DOE LETTERHEAD]

May 17, 1996

The Honorable John T. Conway
Chairman
Defense Nuclear Facilities Safety Board
625 Indiana Avenue, N.W.
Suite 700
Washington, D.C. 20004

Dear Mr. Conway:

This is an interim reply to your letter of September 11, 1995, which transmitted a number of findings associated with the surveillance of Operational Safety Requirements at the Los Alamos National Laboratory (LANL).

The Laboratory has already corrected or is in the process of addressing the findings identified by your staff. Disposition of the findings is described in the letter from LANL to the Manager, Los Alamos Area Office, dated December 19, 1995. The memorandum from the Department of Energy Facility Representative for the Chemistry and Metallurgy Research Building indicates that the issues raised by your staff have been addressed. However, as Mr. Phoenix indicates, institutionalization of key programs, such as the Facility Manager Program, is still not fully implemented.

This topic is high on the list of issues to be addressed for implementation of Board Recommendation 95-2, Integrated Safety Management, where it will be given high priority.

Sincerely,

Victor Stello, Jr.
Principal Deputy Assistant Secretary for Quality
Defense Programs

2 Enclosures
[DOE Albuquerque Operations Office Memorandum]
[LANL Letter to L. D. Kirkman, Acting Manager]

cc:
Mark Whitaker, S-3.1 w/encs.

[DOE ALBUQUERQUE MEMORANDUM]

DATE: APR 1 1996
REPLY
TO

ATTN OF: LAAMFO:7JP-046
SUBJECT: Response to DNFSB OSR Findings
TO: Roger Dintaman, DP-13, HQ

The attached report which was previously submitted by LANL addresses the questions asked by DNFSB for the specific facilities in question. What LAAO is asking in addition to what was presented is, what is LANL doing to institutionalize the corrective measures?

In talking to Larry Andrews of LANL's ESH Group, they have started to institutionalize some aspects of the OSR philosophy in facilities other than nuclear. Some of the areas currently undergoing this are:

- Identification of maintenance requirements (graded approach).
- Development of maintenance procedures.
- Training of maintenance personnel.
- Scheduling maintenance (graded approach) backlog reduction.
- Standardization of maintenance records.
- Zone maintenance.

This program is presently being tracked by one of our office's engineers. There remains to be completed a program that spells out LANL's facility managers' responsibilities and authorities. This is expected by this summer.

I believe the CMR's program is addressing the issues identified, but is not there yet. There are no definite deadlines established for full implementation nor has DOE insisted these issues be addressed immediately.

James A. Phoenix
Office of Facility Operations

Attachment

cc w/o attachment:
D. Glenn, AAMFO, LAAO

[LANL LETTERHEAD]

Date: 19 December, 1995

Refer to: ESH-DO-95:730

L. D. Kirkman, Acting Area Manager
Department of Energy
Los Alamos Area Office

Los Alamos, NM 87544

Dear Larry:

SUBJECT: RESPONSE TO DNFSB OSR REVIEW FINDINGS

On September 11, 1995, the Defense Nuclear Facilities Safety Board (DNFSB) sent a report of findings from a review of Operational Safety Requirements (OSR) surveillance at Los Alamos National Laboratory to the Assistant Secretary for Defense Programs. The DNFSB staff visited the Plutonium Facility at TA-55, the Weapons Engineering Tritium Facility (WETF), and the Chemistry and Metallurgy Research (CMR) Facility. The Laboratory's response to the findings/issues addressed at each facility is included below.

1. *Surveillance of Operational Safety Requirements (OSRs) at the TA-55 Plutonium Facility has significantly improved, although some additional improvements are appropriate. The Chemistry and Metallurgy Research Building appears to need more rigorous OSR surveillance, while surveillance of the Weapons Engineering Tritium facility, a less-complex operation than the Plutonium Facility or the Chemistry and Metallurgy Research Building, appears to be reasonably rigorous.*
 - a. TA-55-4, Plutonium Facility
 - The data package that was found missing is a copy required by our procedure FMP-919 for controlling surveillance procedures. The original of all data packages is kept in Information Records Management. None-the-less, the copy should have been in the operations center and was not on the day of the staff visit. To prevent inadvertent removal of the data package in the future, a process has been established that requires the operators to sign out the data package when they remove it from the file. This requirement has prevented a recurrence of this finding.
 - The procedure mentioned in the finding was not modified to permit adjusting the pump packing while the motor was running even though a modification in the guard was made to allow that to be done. To date, the procedure has not been modified but it is our intention to do so at the next regularly scheduled revision. The reason for not changing the procedure sooner is that we are giving all our priority to developing procedures to implement the now TSRs once they are approved. In the mean time, the procedure is being followed verbatim and the pump is stopped, locked, and tagged if adjustment to the packing is required. We recognize this is burdensome, but it has not had a significant impact on the time required to complete the surveillance.
 - The leaking relief valve has been replaced and the acceptance criteria of "no discharge" is being met. The reason the note was placed in the procedure was the result of a "stop and recover" action taken the prior week when a small amount of discharge was discovered. After determining the cause of the discharge and consultation with the system engineers, it was

decided that the small amount of discharge could be tolerated while the replacement valve was ordered and installed. This variance was approved by the Operations Supervisor and the Facility Manager.

2. TA-3-29, Chemistry and Metallurgy Research (CMR) Building

- During observations of the Fire Suppression Sprinkler Inspection and Flow Device Testing, the DNFSB staff thought that the system was disabled by the inspector without using a formal, detailed procedure specifying the steps to take in disabling and subsequently returning the system to duty. Unfortunately, while the DNFSB staff was here, we were unable to adequately understand and address this concern. The suppression system was not disabled during the testing. However, local alarms were taken out of service to prevent inadvertent activation of the alarms and unnecessary evacuation of the area. In addition, the worker requests that alarm transmittals be taken "out of service" to the Fire Station to prevent inadvertent response by the fire department to alarms during the surveillance tests. In the event of a fire during the surveillance test, current procedure directs the worker to place these alarm systems back in service.

The following actions have been taken since the DNFSB staff's visit to improve formality of operations in the CMR facility:

- Operations Center activities were consolidated to Room A132. Facility Manager and Operations Center personnel visited TA-55 Operations Center to serve as model for setup of CMR Operations Center. Surveillance schedule is posted in the Operations Center.
- Facility Manager met with LANL Industrial Hygiene personnel to schedule review of hood velocity and HEPA test surveillance procedures. An independent contractor participated in the HEPA test surveillance review. The TA-55 hood velocity surveillance procedure was referenced during the hood velocity surveillance review. Reviews were completed by November 30; procedure rewrites are underway.
- Facility Manager met with LANL Fire Protection and Support Services Subcontractor personnel to schedule review of fire suppression surveillance procedures. The TA-55 work area supervisor responsible for fire protection participated in the review of these procedures. Reviews were completed by November 17. Procedures have been rewritten and awaiting final review/approval by Facility Management.
- Corrective actions for self-assessment deficiencies identified on June 12 were completed. Those deficiencies include the specific concerns addressed in the DNFSB report.
- A technical facility operator with nuclear navy training was hired to

support the Operations Center. He observed operations in the TA-55 Operations Center the week of December 4.

- SAR/TSRs were completed and sent to DOE on October 6, 1995.

3. TA-16-205, Weapons Engineering Tritium Facility (WETF)

- The OSR management procedure for WETF has been red-lined (approved change) to require that an individual not performing the surveillance verify that the applicable surveillance has been completed.
- The OSR management procedure for WETF requires that the surveillance data be reviewed for adequacy and completeness prior to considering the surveillance complete. A WETF Improvement/Difficulty Report (WIDR) has been written to evaluate the comment about a possible problem with a related system identified during a surveillance of the Uninterruptible Power Supply (UPS). The WIDR has been given a medium priority.

2. *OSR surveillance procedures need to be reviewed to assure that neither the procedures nor the resulting data packages are more complex than necessary.*

- a. The procedure identified in this finding (FMP-903) will be modified at the next regularly scheduled revision. The Operations Supervisor and the Area Work Supervisor responsible for those systems have indeed identified a way to improve the procedure and reduce the amount of data documentation.

3. *Realistic assumptions with respect to the location of the public, as well as LANL's ability to evacuate the public in an emergency, need to be made in developing the Final Safety Analysis Reports (FSARs) for defense nuclear facilities. Such assumptions affect the identification of OSRs and their successor requirements, Technical Safety Requirements. The identification of safety class structures, systems, and components is also affected.*

- a. The consequences of accidents evaluated in the draft upgraded final safety analysis report (FSAR) for CMR located the public at the Laboratory site boundary (about 1 kilometer from the facility). The CMR FSAR applied the guidance provided by the DOE regarding the location of the public. This guidance is formally presented in a letter from D. Miotla to L. Rigdon, DP-13, "Clarification of Off-Site Boundary Location for the Department of Energy Safety Analysis Reports," September 13, 1995. Consistent with that guidance, the Laboratory can control the roads traversing the Laboratory site during an emergency. Evacuation is covered by site emergency plans in accordance with applicable DOE requirements.

Sincerely,

Larry Andrews
Institutional Affairs Office

MAR:mar

Enc. a/s

Cy:

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D. Post, NMT-8, MS E583
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