

DEFENSE NUCLEAR FACILITIES SAFETY BOARD

July 7, 2017

TO: Steven Stokes, Technical Director
FROM: Bradford Sharpless, Idaho Cleanup Project Cognizant Engineer
SUBJECT: Idaho National Laboratory (INL) Report for June 2017

DNFSB Staff Activity: Board's staff member B. Sharpless was on site at INL during June 19–23 to observe the Department of Energy's (DOE) Integrated Safety Management System (ISMS) Phase II verification at facilities operated by Fluor Idaho, LLC (Fluor). The Board's staff provided an average of 1.4 person-weeks per month of on-site oversight for the first nine months of fiscal year 2017.

Integrated Safety Management System Phase II Verification. During the week of June 19, a review team consisting of personnel from DOE Idaho Operations Office and DOE Headquarters conducted an ISMS Phase II verification at INL's facilities operated by Fluor. At the end of the verification process, the review team concluded that Fluor had effectively implemented ISMS at the site, facility, and activity level. However, the review team also identified the following findings:

- HAZ.1-F-01: Contrary to the requirements of 10 CFR 851.21(5), *Hazard Identification and Assessment*, and PDD-1004, *Integrated Safety Management System*, Fluor procedures and processes have not effectively flowed down the requirements to ensure consistent performance of facility level hazards analysis in the work planning process.
- HAZ.1-F-02: Contrary to the requirements of MCP-101, *ICP [Idaho Cleanup Project] Integrated Work Control Process*, some work orders reviewed failed to comply with process requirements (e.g., training requirements, hazards and mitigations, and precautions and limitations) to ensure worker safety.
- IHS.1-F-01: Contrary to the ISMS Guiding Principles, there was a lack of line management responsibility for safety regarding subcontracted work associated with the INTEC [Idaho Nuclear Technology and Engineering Center] fuel tank inspection; specifically, Fluor line management failed to prevent recurrent safety and health issues associated with the work, once identified by the review team.
- IHS.1-F-02: Contrary to MCP-2726, section 4.1.7 Note, Fluor did not ensure that the respirators used at INTEC for the fuel tank inspection had been approved by the Respiratory Protection Program.
- RP.1-F-01: Contrary to the requirements of 10 CFR 835.501(c)(1), one building at AMWTP [Advanced Mixed Waste Treatment Project], posted as a Radiation Area, had the man-door propped open without a barricade.

Integrated Waste Treatment Unit (IWTU). On June 22, IWTU's Nuclear Facility Manager notified DOE's Facility Representative that a positive unreviewed safety question (USQ) had been determined related to unanalyzed accidents involving the facility's decontamination system. This USQ will be resolved via the Evaluation of the Safety of the Situation (ESS-136) that is being developed in response to the previously-identified positive USQ regarding the analysis for a waste feed tank breach event. In the meantime, a compensatory measure is in place that prohibits the operation of IWTU's decontamination system.