

DEFENSE NUCLEAR FACILITIES SAFETY BOARD

August 25, 2023

TO: Timothy J. Dwyer, Acting Technical Director
FROM: Clinton Jones and Frank Harshman, Resident Inspectors
SUBJECT: Oak Ridge Activity Report for Week Ending August 25, 2023

NPO Oversight: NPO issued the second Triannual Issues Management Meeting (TIMM) Report for the 2023 fiscal year. No new management concerns (MC), emerging items of interest, or noteworthy practices were noted. However, the following MCs at Y-12 will remain open and tracked in the TIMM:

- Disciplined Operations,
- Nuclear Criticality Safety (NCS) Infractions Due to Personnel Errors,
- Inadequate Utilization of the Potential Inadequacy in the Safety Analysis (PISA) Process at Y-12,
- CNS Maintenance Activity Job Plan Clarity Issues and,
- Event Management Weaknesses.

Other MCs also remain open including uranium accumulation, Y-12 production training weaknesses, and expectations for conduct of operations (CONOPs) at development, however these will be tracked outside of the TIMM. NPO requested that CNS provide a briefing based on the longstanding disciplined operations MC, which has been open for greater than 3 years, and other issues with the contractor assurance system, activity work planning and control, housekeeping, electrical safety, and combustible loading concerns. CNS reviewed these issues, provided a briefing to NPO, and acknowledged the problems with the site's conduct of operations and the linkage to recent prominent issues. The resident inspectors discussed the briefing with NPO management and are closely following CONOPs corrective actions being performed by CNS based on the multiple recent fire events and NCS violations that resulted in site-wide work pauses and event declarations.

Building 9995: CNS entered the PISA process for a discrepant as-found condition when Building 9995 exceeded the maximum anticipated quantity for a material identified on the hazardous material identification document (HMID). An NPO facility representative discovered a larger than anticipated quantity of the material during a routine walkdown that called into question the inventory in the building. CNS accounted for the material in the facility's Safety Analysis Report (SAR), however, it was analyzed for laboratory scale quantities only, as defined in DOE G 151.1-1B, *Comprehensive Emergency Management System Guide*. The amount of material in the facility exceeded the analyzed quantity, therefore the facility material inventory was outside of the safety basis. CNS removed the excess material to place the facility back into conformance with the SAR. CNS is not required to declare a PISA for the discrepant as-found condition since the excess material was removed from the facility within three business days from the time of discovery. CNS is evaluating if an event investigation is required, however, they identified two corrective actions. Two proposed corrective actions include creating a HMID surveillance to inventory the material currently in the building on a recurring frequency, and to perform a review of the HMID to ensure the document aligns with the current processes in Building 9995. It is the resident inspectors' opinion that an event investigation would be beneficial to identify additional corrective actions and to formally evaluate the extent of the condition within the facility.