

DEFENSE NUCLEAR FACILITIES SAFETY BOARD

October 1, 1999

TO: G. W. Cunningham, Technical Director
K. Fortenberry, Deputy Technical Director
FROM: D. F. Owen, D. J. Grover, RFETS Site Representatives
SUBJECT: RFETS Activity Report for the Week Ending October 1, 1999

Building 776/777 Deactivation. In response to the poor implementation of Basis for Interim Operation (BIO) safety controls identified during the August 1999 Independent Validation Review (IVR), Kaiser-Hill ordered a stand-down of operations in the Building 776/777 Complex (see Site Rep. Report of August 20). Kaiser-Hill and its subcontractor, Rocky Mountain Remediation Services (RMRS) have been working to fully implement the BIO and prepare for another IVR (much emphasis is being placed on personnel level of knowledge, combustible controls, and drill program improvements). The IVR is not expected to start until late October after a RMRS line management assessment being conducted over the next few weeks.

During a walk-through of the Building 776/777 Complex, the site representatives inspected a tent surrounding the T-1100 tank farm. The tent was used for contamination control during piping removal operations for the tank farms. These operations were completed about one year ago, however, the area has not been decontaminated and the tent removed. The tent has undergone numerous repairs, but appears to be in degrading condition. The site representatives understand that decontamination and tent removal was considered, but the removal was not included in the performance agreement with the contractor. This issue will be discussed further with RFETS management. (3.B)

Recommendation 94-1. The DOE Implementation Plan for Recommendation 94-1 commits to complete repackaging of wet/combustible residues into Interim Safe Storage Criteria (ISSC) compliant packages by May 2002 and also states that a "very small portion will not initially meet ISSC (i.e., double metal containment boundaries), but will be made ISSC compliant or shipped to WIPP by May 2002." The potential for plugging of steel filters on the inner cans of wet/combustible residue drums containing organically contaminated materials has been shown during the past year. As a result, Kaiser-Hill is proposing that the wet/combustible residues be repackaged into multiple layers of filtered plastic bags within a filtered 55-gallon drum. Taking this proposed course of action will result in essentially all repacked wet/combustible residue drums not initially meeting the ISSC. RFETS still intends to either ship the drums to WIPP or make the packaging ISSC compliant (through placing the drums in a Standard Waste Box) by May 2002. DOE-RFFO is considering proposing a modification to the Recommendation 94-1 Implementation Plan consistent with this proposed course of action. The Site Reps. urged DOE-RFFO to address this proposed course of action with the Board prior to its implementation. (3.A)

cc: Board Members