

## DEFENSE NUCLEAR FACILITIES SAFETY BOARD

October 30, 2009

**MEMORANDUM FOR:** T. J. Dwyer, Technical Director  
**FROM:** B. Broderick and R.T. Davis  
**SUBJECT:** Los Alamos Report for Week Ending October 30, 2009

**Plutonium Facility:** Programmatic operations in the Plutonium Facility remain suspended as a result of the recent discovery that portions of the facility's fire suppression system cannot deliver the minimum required flow density of fire water. A Justification for Continued Operations (JCO) has been approved by the NNSA site office that would allow programmatic operations to resume in most areas after compensatory measures to reduce combustible loading have been implemented. The facility is in the process of standing up a new transient combustible loading control program that satisfies both the JCO requirements and a key part of an NNSA condition of approval associated with the 2008 Plutonium Facility documented safety analysis requiring implementation of more robust combustible loading controls (site rep weeklies 10/9/09, 10/2/09).

The new program establishes transient combustible permits for each laboratory room and basement area that specify allowed quantities of various types of combustibles. Areas will be inspected daily to ensure compliance with permit limits. Initially, the transient combustible limits reflected on the permits are based on NFPA code requirements, but facility management intends to gradually tighten permit restrictions with the goal of allowing only the minimum required combustibles needed to support specific operations. The new transient combustible control program goes into effect next week and upon verification of successful implementation of the program and the JCO controls, the facility will pursue resumption of programmatic operations in high-priority laboratory rooms.

**Formality of Operations:** Achieving 'core' implementation of conduct of operations, maintenance and engineering under the Formality of Operations initiative was a major area of emphasis for LANL and NNSA in FY09. Core implementation generally represents reaching a state of minimum compliance with DOE requirements. By the end of FY09, LANL had declared core implementation of all elements of Formality of Operations except for conduct of maintenance and engineering at WETF and conduct of engineering at the Plutonium Facility, which are scheduled to complete in FY10 and FY11, respectively. This week, the site office concurred with LANL's declarations of implementation with three exceptions (conduct of operations at the Plutonium Facility, conduct of maintenance at the WCRR repackaging facility, and conduct of maintenance at the RANT shipping facility). NNSA directed action to be taken to improve the three areas of non-concurrence. NNSA also noted that without continuous attention, the gains made in these critical areas will be lost. Implementing conduct of training, the final element of Formality of Operations, will be a focus area for FY10 and has been contractually incentivized by NNSA.

**Waste Management Risk Mitigation (WMRM) Project:** Physical work to create a connection between the WMRM tank farm and the low level waste collection system completed this week. This a major step toward establishing a capability to provide 250,000 gallons of low level liquid waste storage space for use in an emergency. Also, NNSA-Headquarters (NA-10) has concurred with the LANL and LASO recommended path forward to use 100,000 gallons of WMRM tank space to provide continuous-use low level waste influent storage for the Radioactive Liquid Waste Treatment Facility Upgrade project that is currently in design.