

## DEFENSE NUCLEAR FACILITIES SAFETY BOARD

August 28, 2015

**TO:** S. A. Stokes, Technical Director  
**FROM:** M. T. Sautman and D. L. Burnfield, Site Representatives  
**SUBJECT:** Savannah River Site Weekly Report for Week Ending August 28, 2015

**Specific Administrative Control (SAC):** Because of a desire to include more detail on response actions and times, SRNS is moving away from directive action SACs to those in a limiting condition for operations (LCO) format. The draft K-Area Technical Surveillance Requirements (TSR) includes many LCOs that may involve material-at-risk and fissile material limits, prohibitions of nearby compressed gas cylinders, and restrictions involving stacked, unauthorized, or damaged shipping packages. Normally, violations of these would have triggered a TSR violation, but in this new format an LCO condition would be entered, affected work would immediately stop, a recovery plan or engineering evaluation may be required, and then compliance would be required to be reestablished within X (often 14 days) before the LCO condition could be exited. The site rep noted that since this LCO entry/exit would not result in a TSR violation, the normal process for dealing with these serious conduct of operations events would not be invoked. For example, violating these limits usually require line management and DOE to be formally notified, an occurrence report to be generated, a fact finding meeting to be held, and corrective actions to be identified. Furthermore, the tracking of these events would be harder since they may only appear in control room logbooks and/or facility LCO databases versus DOE-wide databases. The site rep has initiated discussions with SRNS to ensure these violations, which would not officially be violations, are handled appropriately.

**Emergency Preparedness (EP):** In response to concerns about the proximity of fire department vehicles to the incident scene and the hot/warm/cold decontamination lines (see 5/8 and 8/7/15 reports), a meeting was held involving fire department, radiological control, and operations personnel from SRNS and SRR, DOE, and the site representatives to identify where emergency responders will set up. This involved balancing the risks of an ongoing accident (e.g., fire), possible ongoing radiological releases, pressurized water hoses, pump truck operators who typically do not don personnel protective equipment, road widths, and controlling where potentially highly contaminated victims and emergency responders will walk. Related to this, DOE conducted their second tabletop session involving facility operations, SRS Operation Center, fire department, radiological control, and law enforcement personnel to identify how they would respond to radiological releases from various locations in 235-F and F/H Laboratory under different wind directions. The tabletop session focused on which gates and roads to use to approach the incident scene, which fire hydrants to use, where emergency responders would set up, and where law enforcement would set up road blocks to control traffic. It will be important for the lessons learned above to be incorporated and exercised during future EP drills.

**H- Tank Farm:** Tank 22 is a Type IV tank (single wall) and serves as the Defense Waste Processing Facility recycle receipt tank. The purge ventilation system for this tank is classified as safety significant and a surveillance requirement states that the efficiency of these HEPA filter shall be tested every 18 months and that it shall be at least 99.5%. While the test was performed within the specified periodicity, the efficiency was only 97.7%. The HEPA filter was declared inoperable and planning is underway to replace the filter.