

John F. Conway, Chairman
A.J. Eggenberger, Vice Chairman
John W. Crawford, Jr.
Joseph J. DiNunno
Herbert John Cecil Kouts

DEFENSE NUCLEAR FACILITIES SAFETY BOARD

625 Indiana Avenue, NW, Suite 700, Washington, D.C. 20004
(202) 208-6400



June 8, 1993

The Honorable Hazel R. O'Leary
Secretary of Energy
Washington, D.C. 20585

Dear Secretary O'Leary:

In June of 1992, the DNFSB Staff visited the Oak Ridge Y-12 Plant to review the implementation of DNFSB Recommendations 90-2 and 91-1. The results of that review indicated that numerous deficiencies existed in the implementation of these two Recommendations. Those deficiencies were communicated to then Secretary of Energy Watkins in a letter dated July 7, 1992 (enclosure 1).

On April 7-8, 1993, the DNFSB Staff visited the Y-12 Plant to evaluate the implementation of DOE Order 5480.11, "Radiological Protection for Occupational Workers" and the implementation of the DOE Radiological Control Manual. The results of that review (enclosure 2) indicated that there are numerous instances at the Y-12 Plant where DOE, Martin Marietta Energy Systems (MMES), and M.K. Ferguson are not in compliance with DOE Order 5480.11, the DOE Radiological Controls Manual, or consensus standards. In many of these cases there is no documented technical justification for the condition and no compensatory measures are in place. The Board has noted that on May 10, 1993, the DOE Y-12 Site Office Manager took commendable action when he issued a letter to the MMES Vice President and Y-12 Plant Manager noting several substantive deficiencies with the MMES Implementation Plan for the DOE Radiological Control Manual, revision 1.

Based on the results of the above reviews, eight members of the DNFSB Staff and Outside Experts conducted a third trip to Y-12 during the period May 11, 1993 through May 20, 1993 to assess the status of compliance with DOE Orders in general and to follow-up on actions taken at the Y-12 Plant since the Board provided comments to DOE in July of 1992.

The results of the Staff's recent Order compliance review (enclosure 3) indicate that little apparent improvement has been achieved at Oak Ridge in this area in the last eleven months. In fact, most of the deficiencies noted in the June 1992 trip report persist.

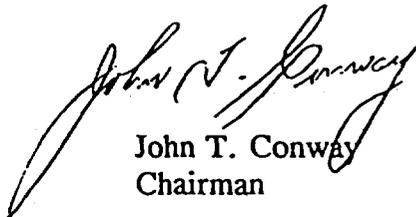
The Board has previously expressed, on a number of occasions, its belief that the use of DOE Orders and consensus standards should be a normal part of day-to-day operations in the

defense nuclear complex. The apparent lack of action at Oak Ridge, particularly in the area of radiological controls, leaves the Y-12 Plant significantly behind other sites in implementing the tenets of DNFSB Recommendation 90-2; therefore, pursuant to 42 U.S.C. § 2286b(d), the Board requests that DOE provide the following two reports:

- A report evaluating the current radiological controls practices at the Y-12 Plant, including those used by DOE-ORO, MMES, and M.K. Ferguson against DOE and consensus standards including specific corrective actions and compensatory measures where required.
- A report evaluating the DOE, MMES, and M.K. Ferguson action plans to correct the deficiencies identified in the DNFSB Staff trip report of June 1992 including specific corrective actions and compensatory measures where required.

The Board requests the above reports be submitted within 30 days of receiving this letter. If you need any further information, please let me know.

Sincerely,



John T. Conway
Chairman

Enclosures

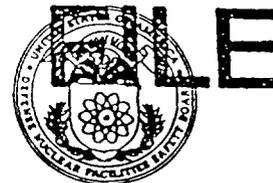
c:

Dr. Everet Beckner, Acting DP-1 w/ enclosure
Mr. Mark Whitaker, Acting DR-1 w/enclosure
Mr. Thomas Grumbly, EM-1
Mr. Joe LaGrone, Manager, Oak Ridge Operations Office

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625 Indiana Avenue, NW, Suite 700, Washington, D.C. 20004
(202) 208-6400 • FTS 268-6400



July 7, 1992

The Honorable James D. Watkins
Secretary of Energy
1000 Independence Avenue, S.W.
Washington, D.C. 20585

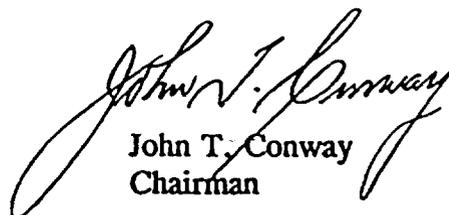
Dear Mr. Secretary:

A group comprised of nine Board staff members and outside experts recently carried out an assessment of the implementation of Board Recommendations 90-2 (issued March 8, 1990) and 91-1 (issued March 7, 1991) at the Y-12 Plant in Oak Ridge. A copy of their report is enclosed.

The report identifies numerous deficiencies at Y-12 in the implementation of both of the Recommendations. As you will recognize, the implications of these deficiencies may well extend beyond Y-12 to facilities at other sites under the cognizance of the Assistant Secretary of Defense Programs (DP) as well as those under the Office of Environmental Restoration and Waste Management (EM).

This report is being provided to you for whatever actions you may deem necessary.

Sincerely,


John T. Conway
Chairman

Enclosure

c:
Hon. Richard A. Claytor, DP-1
Hon. Leo P. Duffy, EM-1
Hon. William H. Young, NE-1
Mr. Victor Stello, Jr., DP-6
Mr. Steven M. Blush, NS-1

Agenda for DNFSB Staff Trip to Y-12 Plant
Implementation of Recommendations 90-2 and 91-1

Monday 1:30 PM June 22, 1992

1. **Introductions & Opening Remarks (15 minutes)** DNFSB
2. **Status of Implementation of Recommendation 90-2** DOE and MMES
 - a. **Identification of applicable Orders**
 - b. **Assessment methodology for order adequacy**
 - c. **Status of implementation**
 - i. **CSAs**
 - ii. **exemptions.**
 - iii. **other issues**
3. **Status of Implementation of Recommendation 91-1** DOE and MMES
 - a. **Organization for developing and implementing directives, orders and standards**
 - b. **Qualification of line and staff personnel responsible for developing and implementing directives, orders and standards**
 - c. **Results of findings from MITRE report applicable to Y-12**
 - d. **Discussion of standards and directives currently under development by DOE and MMES**

Tuesday and Wednesday June 23 - June 24, 1992 (7:30 AM - 3:30 PM)

Order and standards review

<u>Name</u>	<u>Order No.</u>	<u>Subject</u>
R. F. Warther	5000.3A	Occurrence Reporting and Processing of Operations Information
	5700.6C	Quality Assurance
	4330.4A	Maintenance Management Program
	1360.2A	Unclassified Computer Security Program
	5500.7B	Vital Records Protection Program
F. Bamdad	5480.5	Safety of Nuclear Facilities
J. D. Roarty	5481.1B	Safety Analysis and Review
	5480.23	Nuclear Safety Analysis Reports
	5480.22	Technical Safety Requirements
	5480.21	Unreviewed Safety Questions
	5480.CRIT	Nuclear Criticality (draft)

<u>Name</u>	<u>Order No.</u>	<u>Subject</u>
D. L. Burnfield	5480.11	Radiation Protection for Occupational Workers Environment, Safety, and Health Appraisal Program
	5482.1B	
	5480.15	
	5400.5	
J. F. Drain (SPC)	5480.20	Personnel Selection, Qualification, Training and Staffing Requirements at DOE Reactor and Non- Reactor Facilities
	5480.18	Training Accreditation
	5480.19	Conduct of Operations Requirements for DOE Facilities
	5480.17	Site Safety Representatives
L. A. Ettlinger	1300.2A	DOE Standards Program
	4700.1	Project Management System
	6430.1A	General Design Criteria
	5480.1B	Environment, Safety and Health Program
	5480.4	Environmental Protection, Safety and Health Protection Standards
M. V. Helfrich	5400.1	General Environmental Protection Program
	5400.3	Hazardous and Radioactive Mixed Waste Program
	5820.2A	Radioactive Waste Management
	5400.4	Comprehensive Environmental Response, Compensation, and Liability Act Requirements
	5440.1D	National Environmental Policy Act Compliance Program
	5400.2A	Environmental Compliance Issue Coordination
W. M. Shields	5480.7	Fire Protection
	5500.1B	Emergency Management System
	5500.3A	Reactor and Non-Reactor Nuclear Facilities Emergency Management Planning, Preparedness and Response Program for DOE Operations
	5500.10	Emergency Readiness Assurance Program
	5500.4	Public Affairs Policy and Planning Requirements for Emergencies
	5500.2B	Emergency Notification, Reporting Requirements

<u>Name</u>	<u>Order No.</u>	<u>Subject</u>
D. Lignon (MITRE)	5484.1	Environmental Protection, Safety and Health Protection Information Reporting Requirements
	5480.3	Safety Requirements for the Packaging and Transportation of Hazardous Materials, Hazardous Substances and Hazardous Wastes
	5483.1A	Occupational Safety and Health Program for DOE Contractor Employees at Government Owned Contractor Operated Facilities
	5480.8	Contractor Occupational Medical Program
	5480.9	Construction Safety and Health Program
	5480.10	Contractor Industrial Hygiene Program