

Department of Energy

Washington, DC 20585

March 11, 1998

The Honorable John T. Conway Chairman Defense Nuclear Facilities Safety Board 625 Indiana Avenue, N.W. Suite 700 Washington, D.C. 20004

Dear Mr. Chairman:

The January 1998 deliverable called for in the Department's Implementation Plan for Defense Nuclear Facilities Safety Board Recommendation 94-4, is enclosed. The deliverable is commitment 7.1, Quarterly Report 12, containing an update of activities occurring between October 1 and December 31, 1997.

If you have any questions, please contact me or have your staff contact Phil Aiken of my staff at (301) 903-4513.

Sincerely,

Gene Ives

Deputy Assistant Secretary for Military Application and Stockpile Management

Defense Programs

Enclosure

cc w/enclosure:

M. Whitaker, S-3.1

QUARTERLY REPORT 12

DEPARTMENT OF ENERGY

IMPLEMENTATION PLAN

FOR

DEFENSE NUCLEAR FACILITIES SAFETY BOARD

RECOMMENDATION 94-4

DEFICIENCIES IN CRITICALITY SAFETY AT THE OAK RIDGE Y-12 PLANT

REPORTING PERIOD OCTOBER 1 THROUGH DECEMBER 31, 1997

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EXECUTIVE SUMMARY

This Report for the Defense Nuclear Facilities Safety Board (Board) Recommendation 94-4 Implementation Plan (Plan) covers the period from October 1 through December 31, 1997.

Operations in the Receipt, Storage, and Shipping (RSS) and Depleted Uranium Operations (DUO) mission areas were resumed at Y-12 on September 21, 1995, and September 29, 1995, respectively. Disassembly and Assembly (D&A) operations were resumed on March 22, 1996. The Readiness Assessment (RA) of the Quality Evaluation (QE) mission area was completed on December 13, 1996 and unrestricted operations were resumed on February 28, 1997 following the correction of RA pre-start findings.

The only remaining implementation plan deliverables for this recommendation are those associated with resumption of Enriched Uranium Operations (EUO), the final mission area at the Y-12 Plant that has yet to resume full operations, and quarterly reports. The implementation plan (deliverable N.4.2) requires the delivery of a Readiness to Proceed Memorandum w/ endorsements; Readiness Assessment Reports; and, Closure Validation Reports for pre-restart findings. A number of assessments conducted as part of the Department's Implementation Plan have resulted in corrective action plans, detailing actions that are being tracked to closure. Status of closure of corrective actions are reported in quarterly reports (deliverable 7.1). Approximately 85 percent of the corrective actions are complete. The majority of the remainder will be completed as part of the resumption of EUO.

Activities completed during the fourth quarter of calendar year (CY) 1997 are as follows:

<u>Commitment</u> <u>Description</u>

No implementation plan deliverables were due during this period.

Activities scheduled for the first quarter of CY 1998 are as follows:

1. The DOE Operational Readiness Review (ORR) is currently scheduled to begin on March 23, 1998. Therefore, deliverable N.4.2, Readiness to Proceed Memorandum, with endorsements, for Enriched Uranium Operations (EUO) resumption would be expected, prior to the start of the ORR.

TASK 1, ORGANIZATION

Task 1 established the leadership and management structure for the development and execution of the Plan.

Deliverable 1.1, which provided a strawman Plan, and Deliverable 1.2, which identified the Senior Steering Committee, the Senior Working Group, and Task Leaders, were forwarded to the Board on February 24, 1995.

TASKS 2&3, CSA/OSR IMPLEMENTATION AND CRITICALITY SAFETY PROGRAM

There were no implementation plan deliverables due during the Quarter ending December 31, 1997. Work continued on the closure of corrective action plan deliverables. A status of these deliverables is included in Task 6, Corrective Actions.

Activities planned for the next quarter include:

LMES will continue with the actions called out in the respective corrective action plans and is currently scheduled to conduct the corporate ORR of the EUO.

TASK 4, CONDUCT OF OPERATIONS

There were no implementation plan deliverables due during the Quarter ending December 31, 1997. Work continued on the closure of corrective action plan deliverables. A status of these deliverables is included in Task 6, Corrective Actions.

Activities planned for the next quarter include:

LMES will continue with the actions called out in the respective corrective action plans and is currently scheduled to conduct the corporate ORR of the EUO.

TASK 5, TECHNICAL COMPETENCE REVIEW

During the quarter ending December 31, 1997, the following items were accomplished:

None, Task 5 has been completed.

TASK 6, CORRECTIVE ACTIONS

Task 6 provides for the management and tracking of issues and corrective actions and periodic status reports to the Board.

In this task, the Senior Working Group integrates findings from previous task areas and oversees development of corrective action plans.

Attachment C provides corrective action status for all corrective action plans submitted to date, which include Commitments N.1.2, N.2.2, N.2.4, N.3.1, 2.3, 3.3, 3.6, 4.3, 5.3, and 5.6. This status will be formally reported in each Quarterly Report. Table X for Commitment 3.6 incorporates the corrective action plan submitted with the January 1997 deliverables.

ATTACHMENT A: COMMITMENT STATUS

COMMITMENT	DUE DATE	ACTUAL DATE	COMMENTS
N.1.1	APR 95	26 APR 95	
N.1.2	MAY 95	30 MAY 95	
N.1.3	1st START	25 AUG 95	Submit with LMES certification (Commitment N.1.5)
N.1.4	MAR 95	27 MAR 95	
N.1.5	1st START	30 AUG 95	Part of LMES Line Management Certification Letter
N.2.1	NOV 94	18 NOV 94	
N.2.2(a)	OCT 94	13 OCT 94	
N.2.2(b)	APR 95	28 APR 95	
N.2.3	1st START	18 SEP 95	
N.2.4(a)	APR 95	26 MAY 95	
N.2.4(b)	JUN 95	30 JUN 95	
N.2.5(a)	APR 95	12 JUL 95	
N.2.5(b)	MAY 95	12 JUL 95	Addendum addressing Board staff concerns submitted Jan.
N.3.1	MAY 95	30 MAY 95	
N.3.2	1st START	29 AUG 95	Submit with LMES Certification Letter.
N.4.1	MAR 95	27 MAR 95	
N.4.2(a)	1st START	6 DEC 95	RSS: All required deliverables have been submitted.

ATTACHMENT A: COMMITMENT STATUS

COMMITMENT	DUE DATE	ACTUAL DATE	COMMENTS
N.4.2(b)	2nd START	3 NOV 95	DUO: All required deliverables have been submitted.
N.4.2(c)	MAR 96	22 MAR 96	D&A: All required deliverables have been submitted.
N.4.2(d)	JAN 97	28 FEB 97	Quality Evaluation (QE): All items for QE restart have been submitted.
N.4.2(e)	TBD		Enriched Uranium Operations (EUO) mission area.
1.1	DEC 94	2 DEC 94	
1.2	JAN 95	JAN 95	
2.1	JUL 95	28 JUL 95	
2.2	DEC 95	6 DEC 95	Or within 60 days of 2nd resumption; whichever is earlier.
2.3	FEB 96	9 FEB 96	
3.1	JUL 95	28 JUL 95	
3.2	DEC 95	6 DEC 95	Or within 60 days of 2nd resumption; whichever is earlier.
3.3	FEB 96	9 FEB 96	
3.4	JUL 95	28 JUL 95	
3.5	OCT 96	11 OCT 96	Revised by 9 August 96 Seitz (DP-20) to Conway (DNFSB) ltr. forwarding July 96 deliverables.
3.6	JAN 97	23 JAN 97	Within 60 days of report from Commitment 3.5.
4.1	NOV 95	3 NOV 95	30 days following 2nd resumption or Nov 95 whichever is earlier. Two separate program plans.
4.2	DEC 95	6 DEC 95	60 days following 2nd resumption or Dec 95 whichever is earlier. Teams evaluating DOE and LMES each report.

ATTACHMENT A: COMMITMENT STATUS

COMMITMENT	DUE DATE	ACTUAL DATE	COMMENTS	
4.3	FEB 96	9 FEB 96	60 days following issuance of reports in 4.2. One combined CAP.	
5.1	JUN 95	30 JUN 95	EH provided a separate evaluation plan.	
5.2	OCT 95	10 OCT 95	EH conducted a separate evaluation of EH personnel which was submitted separately.	
5.3	DEC 95	31 DEC 95		
5.4	SEP 95	28 SEP 95		
5.5	MAY 96	16 MAY 96	Revised by IP Change 4	
5.6	JUL 96	19 JUL 96	Revised by IP Change 4	
6.1	QTRLY		Submit with Quarterly Reports of Commitment 7.1.	
7.1(a)	APR 95	28 APR 95	Interim report.	
7.1(b)	QTRLY		Submit quarterly commencing in July 95.	
8.1	AS REQ'D			

ATTACHMENT B: MONTHLY SCHEDULE OF DELIVERABLES Schedule of Deliverables # = Target Date

Mo/Yr	Near Term Initiatives	Tasks
Jul 97		7.1
Aug		
Sep		
Oct		7.1
Nov		
Dec		
Jan 98		7.1
Feb		
Mar		
Apr		7.1
May	N.4.2 for EUO	
Jun		
Jul		7.1
Aug		
Sep		
Oct		7.1

TABLE I

N.1.2: CORRECTIVE ACTION PLAN FOR LMES EVALUATION OF CRITICALITY SAFETY PROGRAM AND CSA/OSRs. (LMES Report Y/NO-00002)

REFERENCE NUMBER	CORRECTIVE ACTION PLAN (CAP) ITEM	PLANNED CLOSURE	ACTUAL DATE
Y/NO-00002 SECTION 2	CORRECTIVE ACTIONS FOR FIRST MISSION AREA RESUMPTION		
LESSON LEARNED 1	CSA/OSR requirement statements must be clear and concise.		
ACTION LL 1-1	Revise Procedure Y70-160, Criticality Safety Approval System, Training Module 8836, Nuclear Criticality Safety Training for Y-12 Supervisors, and Procedure Y50-66-CS-325, Nuclear Criticality Safety Analysis, Approval, and Control System.		22 MAY 95
ACTION LL 1-2	Additional changes in the CSA process have been made to improve clarity and conciseness of CSA requirements. RSS related CSAs have been revised. Revise Procedure Y70-160.	RSS RESTART	28 AUG 95
ACTION LL 1-3	Develop new OSRs for RSS facilities and submit to DOE for approval.		8 MAY 95
LESSON LEARNED 2	The compliance methodology must be clearly articulated in CSAs/OSRs.		
ACTION LL 2-1	Develop and implement a CSA verification and validation process and a CSA implementation process to ensure compliance with the newly revised CSA administrative standards. These are procedurally controlled by Y70-01-150 (DSO) and Y70-37-19-071 (EUO).		22 MAY 95
LESSON LEARNED 3	Operating and technical support personnel must understand safety implications which require strict compliance with CSAs/OSRs.		
LESSON LEARNED 4	There must be an auditable path from CSA/OSR requirements to documentation which demonstrates compliance.		
ACTION LL 4-1	Issue a standing order by the DSO Manager identifying the required compensatory measures when using procedures that do not incorporate CSA requirements. (Action 3-4 addresses the long term corrective actions.)		22 MAY 95

TABLE I

N.1.2: CORRECTIVE ACTION PLAN FOR LMES EVALUATION OF CRITICALITY SAFETY PROGRAM AND CSA/OSRs. (LMES Report Y/NO-00002)

REFERENCE NUMBER	CORRECTIVE ACTION PLAN (CAP) ITEM	PLANNED CLOSURE	ACTUAL DATE
LESSON LEARNED 5	An implementation plan which permits continuous compliance with effective CSAs/OSRs is required for new and revised CSAs/OSRs.		
ACTION LL 5-1	Revise Procedure Y70-160 to provide a period for implementation of new or revised CSAs.	RSS RESTART	28 AUG 95
ACTION LL 5-2	Develop and approve surveillance procedures for the five new RSS OSRs. Conduct training and perform these procedures. Ensure operability of all required OSR-related systems and components before the OSRs become effective.		23 MAY 95
LESSON LEARNED 6	CSA/OSR noncompliances must be reported immediately.		
ACTION LL 6-1	Conduct awareness and Lessons Learned training on importance of following procedures and management expectations for nuclear operations personnel.		22 MAY 95
ACTION LL 6-2	Organizations responsible for OSR compliance develop and approve specific procedures that provide guidance for completing LCO actions when equipment does not meet LCO requirements. (Required by RSS resumption POA)		JUN 95
LESSON LEARNED 7	Facilities and operations involving CSAs/OSRs must be controlled to meet the expectation that activities are performed within the approved safety basis.		
ACTION LL 7-1	Implement a rigorous conduct of operations program through the RSS resumption POA and the 94-4 Implementation Plan. A specific detailed schedule coordinating implementation and assessment is part of the RSS resumption.	RSS RESTART	19 SEP 95
Y/NO-00002 SECTION 3	CONTINUED IMPLEMENTATION OF THE UPGRADE PROGRAM (Note: Continued implementation of the upgrade programs will be influenced by the assessments and CAPs resulting from the execution of Tasks 2-5 of the 94-4 Implementation Plan.)		

REFERENCE NUMBER	CORRECTIVE ACTION PLAN (CAP) ITEM	PLANNED CLOSURE	ACTUAL DATE
ACTION 3-1	LMES management apply the programmatic corrections described in Section 2 of Y/NO-00002 throughout the resumption process for Y-12 nuclear operations. (Based on restart of EUO)	SEP 98	
ACTION 3-2	Upgrade the OSRs and CSAs for continuing nuclear operations to the new standards.	TBD TASKS 2/3 CAPs	1 JUL 97 for NucOps and Upon Completion of ORR for EUO
ACTION 3-3	Upgrade the CSAs and OSRs for each subsequent mission area prior to resumption of normal operations. a - RSS, b - DUO, c - D&A, d - QE, e - EUO	PRIOR TO EACH MISSION AREA RESTART	a - 21 SEP 95 b - N/A c - 22 MAR 96 d - 31 DEC 96 e - Pending ORR
ACTION 3-4	Complete new operating procedures incorporating revised CSA requirements.	TBD TASK 4 CAP	JUN 96
ACTION 3-5	Develop a configuration management system to supplement or replace the change control and document control processes in place for resumption.	MAR 97	25 APR 95 ² (Y10-187) 31NOV 95 ² (Plant CM Prog. Plan)
ACTION 3-6	Develop a standard describing the process for writing OSRs at Y-12.	JUN 95	28 JUL 95
ACTION 3-7	Upgrade individual OSRs as required by Phase II of the Safety Analysis Report Update Program (SARUP) refinement of their technical basis.	SAR/TSR Implementation	In Accordance with Implementation Schedule
ACTION 3-8	Develop and implement the Nuclear Criticality Safety Improvement Program (NCSIP) to support 94-4 Implementation Plan Tasks 2 and 3.	94-4 Task 2 & 3 Assessment Dates	30 NOV 96

^{1.} CSAs were upgraded in Nuclear Operations to support the readiness assessments. The upgrade of EUOs criticality safety requirements will be validated during the ORR. Nuclear Operations that have resumed have submitted Revision 3 to the OSRs. These revised OSRs are based on upgraded safety authorization documentation (Basis for Interim Operations). A SAR development plan to upgrade from BIOs/OSRs to SARs/TSRs has been submitted and accepted by DOE-ORO.

^{2.} Y10-187 established minimum requirements for a CM program. The CM Program Plan was used to implement Y10-107 and integrated the document control and work control programs with the CM program. 3. An Implementation Plan (Revision 4) for DOE Orders 5480.22 and 5480.23 has been published and approved. SAR/TSR upgrades should be removed from this CAP and tracked according to the schedule in the implementation plan.

TABLE II

N.2.2: CORRECTIVE ACTION PLAN FOR ORO ROLE IN Y-12 INCIDENT.
(ORO R.J. Spence Memorandum dated 28 April 95)

REFERENCE NUMBER	CORRECTIVE ACTION PLAN (CAP) ITEM	PLANNED CLOSURE	ACTUAL DATE
ACTION 1-1	Performance Indicators and Analyses: Review existing monthly data to determine if new performance indicators should be added or old ones deleted. Review completed and recommended changes forwarded for processing as outlined in attachment 1 to Spence memo.	VARIOUS THRU NOV 95	28 SEP 95
ACTION 1-2 / 1-3	Distribution of performance indicators is limited. Update and expand the distribution list. Distribute over LAN.		31 MAR 95
ACTION 2-1	ORO oversight not consistently challenging laxity: Develop a Conduct of Operations self-study course which would emphasize attention to detail and the standards based approach.	JUN 95	30 JUN 95
ACTION 2-2	Modify ORO appraisal training to include conduct of operations as the responsibility of everyone.	AUG 95	28 JUL 95
ACTION 3-1	Inadequate staffing of the Facility Representative (FR) Program at YSO. Hire six more FRs.		3 APR 95
ACTION 4-1	Facility Representatives were unsure as to their shutdown authority. Issue ORO wide policy on shutdown authority.		6 OCT 94
ACTION 4-2	Facility Representatives were unsure as to their shutdown authority. Revise YSO procedure 1.6		13 DEC 94
ACTION 5-1	Incorporating Conduct of Operations into ORO internal value system requires upper management support. Brief Senior Management Board on Conduct of Operations.	AUG 95	22 AUG 95
ACTION 6-1	ORO must improve its ability to anticipate problem areas and conduct subsequent mitigation planning. Develop issues management tracking system and program.	SEP 95	28 AUG 95
ACTION 7-1	HQ funding and support to implement conduct of operations must be adequate. This will be evaluated as part of Task 4 to the 94-4 Implementation Plan.	NOV 95	8 NOV 95

TABLE III

N.2.4 (b): CORRECTIVE ACTION PLAN FOR ADDRESSING DP-24 LINE MANAGEMENT ISSUES ASSOCIATED WITH ITS ROLE AT Y-12.

(D. Rhoades Memorandum dated 30 June 95)

REFERENCE NUMBER	CORRECTIVE ACTION PLAN (CAP) ITEM	PLANNED CLOSURE	ACTUAL DATE
SECTION A	FUNCTIONS, ASSIGNMENTS, AND RESPONSIBILITIES		
ACTION A.1	FAR compliance. DP-24 continue to monitor progress in addressing noncompliances with the FAR Manual as identified by the ongoing DP-31 assessment.		ONGOING
ACTION A.2	Monitor revisions to the Defense Programs Operations Manual (DPOM) as promulgated by DP-40.		ONGOING
ACTION A.3	Carry out management and oversight activities specified in Chapter 7 of the DP-24 Process Manual.		30 JUN 95
SECTION B	NUCLEAR SAFETY ISSUES		
ACTION B.1	DP-24 establish a Site Assistance Team to conduct assistance visits to Defense Programs sites including Y-12.		30 JUN 95
ACTION B-2	Develop an issue database for the DP-24 Action Tracking System that includes issues from assist visits, audits and assessments performed at Y-12, SRS Tritium Facility, and Pantex.	OCT 95	31 OCT 95

TABLE III

N.2.4 (b): CORRECTIVE ACTION PLAN FOR ADDRESSING DP-24 LINE MANAGEMENT ISSUES ASSOCIATED WITH ITS ROLE AT Y-12.

(D. Rhoades Memorandum dated 30 June 95)

REFERENCE NUMBER	CORRECTIVE ACTION PLAN (CAP) ITEM	PLANNED CLOSURE	ACTUAL DATE
SECTION C	BUDGET PROCESS		
ACTION C-1	Develop office procedures which assure that ES&H measures are incorporated during the planning for activities involving stockpile support facility operations. (DP-24 Process Manual, Section 5.1)		MAR 95
ACTION C-2	Establish an Integrated Multi-Year Program Plan to implement guidance and direction for programmatic execution of the National Security Strategic Plan (NSSP).		30 JUN 95
ACTION C-3	Conduct program reviews on selected issues at each nuclear weapons facility on a quarterly basis.		30 JUN 95
SECTION D	DP-24 PROCESS MANUAL		
ACTION D-1	Complete development of the Process Manual.	NOV 95	APR 96
ACTION D-2 (a)	Develop and implement a training program on the Process Manual for DP-24 management and staff.	NOV 95	APR 96
ACTION D-2 (b)	Complete training for all DP-24 personnel on the Process Manual.	JAN 96	SEP 96

TABLE IV

N.3.1: LMES ASSESSMENT OF THE CURRENT CONDUCT OF OPERATIONS POSTURE INCLUDING PROPOSED NEAR-TERM CORRECTIVE AND/OR COMPENSATORY ACTIONS. (LMES Report Y/NO-00003)

REFERENCE NUMBER	CORRECTIVE ACTION PLAN (CAP) ITEM	PLANNED CLOSURE	ACTUAL DATE
Y/NO-00003 SECTION 3	NEAR TERM ACTIONS THAT ADDRESS THE ROOT CAUSE		
ACTION 3-1	All OSRs, CSAs, and implementing primary procedures supporting the RSS Mission Area are in the final phase of approval. Complete the approval process. (para. 3.2.2)	RSS RESTART	21 SEP 95
ACTION 3-2	Employee training on all revised procedures will be completed shortly after approval. Train employees. (para. 3.2.2)	RSS RESTART	21 SEP 95
ACTION 3-3	Issue revised OSRs, CSAs, and implementing primary procedures. (para. 3.2.2)	RSS RESTART	21 SEP 95
ACTION 3-4	Upgrade surveillance procedures supporting the initial resumption Mission Area. (para. 3.3.1)		25 MAY 95
ACTION 3-5	Revise the procedure use categorization process. (para. 3.4.1)		25 MAY 95
ACTION 3-6	Properly categorize existing operating and surveillance procedures in resumption mission area and train personnel to the new definitions-of-use. (para. 3.4.2) a - RSS, b - DUO, c - D&A, d - QE, e - EUO	PRIOR TO EACH MISSION AREA RESTART	a - 21 SEP 95 b - 29 SEP 95 c - 22 MAR 96 d - 31 DEC 96 e - Pending ORR
ACTION 3-7	Upgrade the procedure verification and validation process. (para. 3.4.3)		25 MAY 95
ACTION 3-8	Develop a Conduct of Operations Manual with sections of the manual to be issued in accordance with an implementation plan schedule to support RSS. (para. 3.5)	RSS RESTART	21 SEP 95
ACTION 3-9	Operations Areas will be defined to manage operations and maintain safety envelope integrity. The Operations Area for Bldg 9212 has been established and described in Chapter 1 of the Conduct of Operations Manual. Identify remaining Operations Areas. (para. 3.6.1) a - RSS, b - DUO, c - D&A, d - QE., e- EUO	PRIOR TO EACH MISSION AREA RESTART	a - 21 SEP 95 b - 29 SEP 95 c - 22 MAR 96 d - 31 DEC 96 e - Pending ORR

TABLE IV

N.3.1: LMES ASSESSMENT OF THE CURRENT CONDUCT OF OPERATIONS POSTURE INCLUDING PROPOSED NEAR-TERM CORRECTIVE AND/OR COMPENSATORY ACTIONS. (LMES Report Y/NO-00003)

REFERENCE NUMBER	CORRECTIVE ACTION PLAN (CAP) ITEM	PLANNED CLOSURE	ACTUAL DATE
ACTION 3-10	Four new positions are being established that will directly impact conduct of operations practices: Operations Manager, Shift Manager, Shift Administrative Assistant, and Shift Technical Advisor. Fill these positions. (para. 3.6.2) a - RSS, b - DUO, c - D&A, d - QE, e- EUO	PRIOR TO EACH MISSION AREA RESTART	a - 21 SEP 95 b - 29 SEP 95 c - 22 MAR 96 d - 31 DEC 96 e - Pending ORR
ACTION 3-11	Develop and implement a training program for Shift Technical Advisors (STA). (para. 3.6.2)	SEP 96	31 DEC 96
ACTION 3-12	Develop a detailed and formalized self-assessment program to promote management identification of weaknesses in conduct of operations performance. (para. 3.7.1)	JAN 96	EUO PILOT JAN 96
ACTION 3-13	Develop and implement conduct of operations performance measures which will provide management with clear trends and a basis for corrective actions. (para. 3.7.1) a - RSS, b - DUO, c - D&A, d - QE, e - EUO	PRIOR TO EACH MISSION AREA RESTART	a - 21 SEP 95 b - 29 SEP 95 c - 22 MAR 96 d - 31 DEC 96 e - Pending ORR
ACTION 3-14	For the RSS Mission Area, resumption supporting activities have been incorporated into a detailed logic driven integrated schedule. Remaining Mission Area Managers develop their integrated schedules. (para. 3.7.4) a - RSS, b - DUO, c - D&A, d - QE, e - EUO	PRIOR TO EACH MISSION AREA RESTART	a - 21 SEP 95 b - 29 SEP 95 c - 22 MAR 96 d - 31 DEC 96 e - Pending ORR
Y/NO-00003 SECTION 4	LONG TERM ACTIONS THAT ADDRESS THE ROOT CAUSE		
ACTION 4-1	Expand the staff to the Manager, Nuclear Operations to provide him direct staff support in matters impacting on conduct of operations practices. (para. 4.1)	DEC 95	1 OCT 95
ACTION 4-2	Assign an Assistant Manager to each Operations Manager (Depleted Uranium, Disassembly and Storage, and Enriched Uranium). (para. 4.1.1)	DEC 95	1 OCT 95
ACTION 4-3	Hire for a newly approved position titled Qualification and Procedures Manager, who will ensure all department procedures are current and all affected employees are current in their respective qualification. (para. 4.1.2)		JUN 95

TABLE IV

N.3.1: LMES ASSESSMENT OF THE CURRENT CONDUCT OF OPERATIONS POSTURE INCLUDING PROPOSED NEAR-TERM CORRECTIVE AND/OR COMPENSATORY ACTIONS. (LMES Report Y/NO-00003)

REFERENCE NUMBER	CORRECTIVE ACTION PLAN (CAP) ITEM	PLANNED CLOSURE	ACTUAL DATE
ACTION 4-4	Establish and fill a new position called Program Support Manager to coordinate key activities that influence implementation of a conduct of operations program. (para. 4.1.3)		25 MAY 95
ACTION 4-5	Establish a continuing training program that will ensure that proficiency and requalification are performed in accordance with DOE Order 5480.20A. (para. 4.2.2)	TBD 94-4 TASK 5 CAP & 5480.20 TIM	31 DEC 96
ACTION 4-6	Implement and integrate administrative processes for configuration control, work control, document control, and other site-wide processes. (para. 4.3.3)	#95-2 Implementation	##
ACTION 4-7	Train line managers to assess conduct of operations performance by observations/evaluations at the working level. (para. 4.4.1)	JAN 96	31 JAN 96

#Although programs to implement configuration management, work control, document control, etc., have been implemented as part of restart, these programs lack integration. The Integrated Safety Management System implementation plan commits to upgrade and integrate these processes by 9/97.

##This action is currently being addressed through the implementation of DNSFB Recommendation 95-2, Integrated Safety Management. Revised work control, configuration management, and integrated safety management (ISM) program procedures were issued on 10/31/97. The full implementation (including training on these revised procedures and the establishment of Operational Safety Boards) of ISM will be completed in Nuclear Operations facilities by January 31, 1998, in EUO in support of restart (Spring 1998), and will be validated by DOE in May 1998. The implementation strategy and plan for balance of plant facilities will beissued by the Y-12 Plant Manager by April 1, 1998.

5.3: DOE 94-4 IMPLEMENTATION PLAN COMMITMENT 5.3 TRAINING PROGRAM ACTION PLAN.

REFERENCE NUMBER	CORRECTIVE ACTION PLAN (CAP) ITEM	PLANNED CLOSURE	ACTUAL DATE
SECTION II	HEADQUARTERS, DP-24, ACTION PLAN		
1. DP-24 line n to be strengthen	nanagement ownership and commitment to training need ed.		
T5-HQ-1	Designate a DP-24 training driver to aggressively implement the Technical Qualification Program.	DEC 95	DEC 95
Т5-НQ-2	Assign DP-24 Y-12 Team staff to a technical functional area (vs. technical manager) to provide a technically stronger team and simplify the overall process.	DEC 95	8 DEC 95
T5-HQ-3	Ensure managers include specific goals and training requirements of the staff in the employee's IDPs. a) identify needed competencies; b) evaluate existing equivalencies and completion of competencies; c) identify formal training to meet competencies; and d) identify professional goals.	DEC 95 MAR 96 JUN 96 JUN 96	8 DEC 95 APR 96 JUN 96
SECTION III	OAK RIDGE, Y-12 SITE, ACTION PLAN		
Line management	nt ownership and commitment to training need to be strengthened.		
T5-ORO-1a	TDD should report directly to the ORO Manager/Deputy Manager.		No action proposed
T5-ORO-1b	A proactive TDD technical training specialist should be matrixed to YSO and should report directly to the YSO Manager.	OCT 95	31 OCT 95
T5-ORO-1c	ORO should designate a lead senior technical manager and technical representatives from all ORO line organizations to work together and be responsible for providing direction and guidance to TDD and line staff for effective and efficient implementation of 93-3.		No action proposed
T5-ORO-1d	YSO line management should formally identify training needs and hold TDD accountable for specific deliverables. This is normally accomplished by a training plan developed by the technical line management with input from TDD.	ONGOING	ONGOING

5.3: DOE 94-4 IMPLEMENTATION PLAN COMMITMENT 5.3 TRAINING PROGRAM ACTION PLAN.

REFERENCE NUMBER	CORRECTIVE ACTION PLAN (CAP) ITEM	PLANNED CLOSURE	ACTUAL DATE
2. TDD needs t management ne	o be aggressive in identifying and supporting line eds.		
T5-ORO-2a	Provide a matrixed technical training specialist to report full time to the YSO Manager.	OCT 95	31 OCT 95
T5-ORO-2b	Develop technical training materials in support of line management needs for self-study and on-the-job training.		ONGOING
T5-ORO-2c	Develop and present formal performance-based training.		ONGOING
T5-ORO-3	YSO, with support from TDD, needs to expedite development of site-specific training for Facility Representatives and technical support personnel. (While a more aggressive schedule is being pursued, this effort is heavily dependent on resource availability.)	MAY 98 (Based on 93-3 commitment)	
T5-ORO-4	YSO needs to provide timely follow-up and closure of deficiencies and commitments from the contractor to ensure improvement is continually achieved. (Develop and implement a deficiency tracking system.)	DEC 95	4 JAN 96
T5-ORO-5	YSO needs to define and implement Facility Representative roles and responsibilities during an emergency.	NOV 95	15 DEC 95
T5-ORO-6	The Restart Team including the Facility Representatives needs to be reconfigured into an Operations Branch reporting directly to the YSO Manager following resumption of operations.	LAST RESTART	

REFERENCE NUMBER	CORRECTIVE ACTION PLAN (CAP) ITEM	PLANNED CLOSURE	ACTUAL DATE
	NUCLEAR CRITICALITY SAFETY		
F02	LMES is not performing a formalized root cause analysis for repetitive nuclear criticality safety (NCS) deficiencies. This finding is supported by discussion related to the following issues: Issue 1: A formal Root Cause Analysis is not always performed and/or documented for criticality safety deficiencies. This is particularly evident for repetitive or generic deficiencies. This may lead to the identification of incorrect corrective actions. Issue 2: The corrective action procedure utilizes predetermined root cause codes which inherently discourage the use of independent analysis. Issue 3: the principle probable cause identified in the Type-C investigation does not appear to have a corresponding corrective action.		icality safety ead to the nerently discourage
ACTION 1	Using a team of operations managers, NCS managers, procedure managers, and DOE Site Office personnel, benchmark other NCS programs in the DOE complex (minimum of 3).	FEB 96	8 MAR 96
ACTION 2	Prepare a trip report from benchmarking trips	FEB 96	8 MAR 96
ACTION 3	From trip report, develop needed improvement areas and approach. This NCS Improvement Plan needs to consider at a minimum the following: (1) response to incidents and nonconformances, and the proper level of response invoked by procedures; (2) coordinate with Quality Organization to determine when to perform a root cause analysis for repetitive or generic trends related to NCS or CSA deficiencies; and (3) development of a proceduralized trending program.	APR 96	JUN 96
	(Revision 1a) Develop an implementation plan to execute the NCS Improvement Plan specifics. Include any phasing of changes and any required retraining/requalification needed. (Note: Specific action assignments will involve tasking of facilities to execute requirements. This corrective action plan may require update after the completion of F02 Action 3.) (Original Action 5)	NOV 96	30 NOV 96
ACTION 4	Incorporate threshold criteria for performing root cause analysis in QA-16.1, Corrective Action Program.	APR 96	29 APR 96
ACTION 5	Review and revise root cause procedure to include description of appropriate root cause methods, including TapRoot analysis.	JUN 96	28 JUN 96

2.3: CORRECTIVE ACTION PLAN FOR TASK 2 ASSESSMENT (LMES letter to R.J. Spence dated January 30, 1996.) (Revision 1a, YSO letter to D. Rhoades dated October 28. 1996)

REFERENCE ACTUAL CORRECTIVE ACTION PLAN (CAP) ITEM **PLANNED** NUMBER **CLOSURE** DATE Conduct a TapRoot analysis of the September 22, 1994, event as noted in the Type-C investigation. Develop corrective action plan ACTION 6 **JUN 96** 28 JUN 96 based on results of root cause analysis. Review the root cause identified in Y/DD-679. Based on the NCS Improvement Plan and as scheduled in the ACTION 7 **FEB 97** 1 MAY 97 implementation plan, draft needed changes to procedures/new procedures to improve the noted area. Forward copy of site manual/new procedures to DOE Site Office. **ACTION 8 MAR 97** 15 MAY 97 Develop a plant group (similar in composition to benchmarking **MAY 97** ACTION 9 15 MAY 97 group) to assess effectiveness of implementation plan. Postings do not specify limits on control parameters or explicitly identify allowed material. F11 Using a team of operations managers, NCS managers, procedure ACTION 1 **FEB 96** 8 MAR 96 managers, and DOE Site Office personnel, benchmark other NCS programs in the DOE complex (minimum of 3). Prepare trip report from benchmarking trips. FEB 96 8 MAR 96 **ACTION 2** From trip report, develop needed improvement areas and approach. This NCS Improvement Plan needs to consider at a minimum the following: (1) review use of postings as operator aids **ACTION 3** and (2) requirements of American National Standards Institute (ANSI) 8.1, Section 4.1.4, that postings shall be maintained specifying material identification and all limits that are subjected to procedural control. **NOV 96** 30 NOV 96 (Revision 1a) Develop an implementation plan to execute the NCS Improvement Plan specifics. Include any phasing of changes and any required retraining/requalification needed. (Note: Specific action assignments will involve tasking of facilities to execute requirements. This corrective action plan may require update after the completion of Action 3.) (Original Action 4) ACTION 4 Based on the NCS Improvement Plan and as scheduled in the **FEB 97** 1 MAY 97 implementaion plan, draft needed changes to procedures/new procedures to improve noted area.

REFERENCE NUMBER	CORRECTIVE ACTION PLAN (CAP) ITEM	PLANNED CLOSURE	ACTUAL DATE
ACTION 5	Provide training to NCSD personnel on revised requirements for NCS postings.	MAR 97	1 MAY 97
ACTION 6	Forward copy of site manual/new procedures to DOE Site Office.	MAR 97	15 MAY 97
ACTION 7	Develop a plant group (similar in composition to benchmarking group) to assess effectiveness of implementation plan.	MAY 97	15 MAY 97
F14	LMES has not explicitly identified associated limits for controlled part	rameters in criticality	safety analyses.
ACTION 1	Using a team of operations managers, NCS managers, procedure managers, and DOE Site Office personnel, benchmark other NCS programs in the DOE complex (minimum of 3).	FEB 96	8 MAR 96
ACTION 2	Prepare trip report from benchmarking trips.	FEB 96	8 MAR 96
ACTION 3	From trip report, develop needed improvement areas and approach. This NCS Improvement Plan needs to consider at a minimum the following: Determine the interpretation of ANSI/ANS-8.19-1984, Section 8.3, concerning the "explicit" identification of associated limits for controlled parameters in criticality safety analysis. Ensure requirements are clearly identified from controlled parameters in the analyses. Ensure that these requirements are included in the CSAs to support the controls identified in the analysis. Identify the explicit controls and requirements relied upon for double contingency in criticality safety analyses. Process to quickly revise current CSAs, including a method to document the incorporated revisions. Operations validation and verification of CSA requirements. (Revision 1a) Develop an implementation plan to execute the NCS Improvement Plan specifics. Include any phasing of changes and any required retraining/requalification needed. (Note: Specific action assignments will involve tasking of facilities to execute requirements. This corrective action plan may require update after the completion of Action 3.) (Original Action 4)	NOV 96	30 NOV 96
ACTION 4	Based on the NCS Improvement Plan and as scheduled in the implementation plan, draft needed changes to procedures/new procedures to improve noted area.	FEB 97	1 MAY 97

REFERENCE NUMBER	CORRECTIVE ACTION PLAN (CAP) ITEM	PLANNED CLOSURE	ACTUAL DATE
ACTION 5	Forward copy of site manual/new procedures to DOE Site Office.	MAR 97	15 MAY 97
ACTION 6	Develop a plant group (similar in composition to benchmarking group) to assess effectiveness of implementation plan.	MAY 97	7 MAY 97
	OPERATIONS/NUCLEAR CRITICALITY SAFETY		
F13	Thirty-two identified areas requiring CSAs in Enriched Uranium Ope	erations do not have C	CSAs in place.
ACTION 1	Review enriched uranium operations to identify areas requiring CSAs that are missing CSAs per Y70-150.	MAY 96	AUG 96
ACTION 2	Issue CSAs for those dynamic continuing operation areas that are missing CSAs. [Note: Dynamic fissile material activities are defined as those which (1) require operator movement of fissile materials when actions are taken according to the CSA and/or the existing operating procedure; or (2) the processes/systems induce the movement of fissile material without operator intervention; or (3) surveillances and/or inspections are required by the CSA. Dynamic activities may be categorized as dynamic-deferred activities upon evaluation of risk. Static activities are ongoing but the systems/processes are not changing (e.g. fissile material storage arrays).]	AUG 96	24 OCT 96
ACTION 3	For static continuing operation areas, dynamic-deferred continuing operation areas, and noncontinuing operation areas, formally document the safety basis with peer review (via a "white paper").	DEC 96	2 DEC 96
ACTION 4	Complete development of the NCS Improvement Plan that is to include the following: (1) Define the standard for when a criticality safety analysis is needed and how it is obtained. This standard must comply with ANSI 8.1. (2) Define who is responsible for implementation of the nuclear criticality safety standards, how they are held accountable, and acceptable compensatory actions if compliance with the standards cannot be maintained (e.g. mechanism for deviation without necessarily revising the CSA). (3) Define how to make modifications to procedures and policies if standard changes are required.	NOV 96	30 NOV 96
F16	Operations for Special Nuclear Material (SNM) Vehicle Transport re 1 or Class 2 procedures.	equiring CSAs are no	t covered by Class

REFERENCE NUMBER	CORRECTIVE ACTION PLAN (CAP) ITEM	PLANNED CLOSURE	ACTUAL DATE
ACTION 1	Replace procedure Y20-NM-01-09-002 with a Y50-series technical procedure which will fully comply with the current revision of Y10-102. (Note: All fissile material movements are now required to be covered by Class 1 or Class 2 technical procedures per Y10-102.)	FEB 96	19 FEB 96
ACTION 2	Complete a critique of the incident(s) which lead to F16 and the initial response to the finding. Develop additional corrective actions as required.	MAR 96	29 MAR 96
F20	LMES has not performed a CSA requirement for the Building 9215 r LMES properly authorized the deviation.	nachine shop coolant	system nor has
ACTION 1	Walkdown Enriched Uranium Operations (EUO) continuing operations CSAs to identify deficiencies.	JAN 96	31 JAN 96
ACTION 2	Correct the deficiencies using approved methods.	OCT 96	2 OCT 96
ACTION 3	Coordinate with NCSD to perform redline change to CSA 15104.	AUG 96	1 AUG 96
ACTION 4	Complete development of the NCS Improvement Plan that is to include the awareness of the NCS Department personnel regarding evaluation and documentation of the NCS issues.	NOV 96	30 NOV 96
ACTION 5 10028523 A0066582	Perform a review of EUO equipment prior to restart for holdup. *This action is linked directly with restart of EUO operations. Equipment review for holdup is an integral part of the PBR turnover process and CSR implementation. Holdup points are established with Criticality Safety approval, quantification of existing holdup is performed by EUO technical support personnel with evaluation of results conducted by Criticality Engineers. Cleanout of equipment is based upon results of evaluations of Criticality Engineers. Review of all equipment slated for restart will not be completed until Phase B turnover of equipment is completed, therefore this action closure should be changed to March, 1999.	*MAR 99	
	FIRE PROTECTION		

REFERENCE NUMBER	CORRECTIVE ACTION PLAN (CAP) ITEM	PLANNED CLOSURE	ACTUAL DATE
F07	Nuclear Criticality Safety Guidelines for Fire Fighting in MAAs provides only general guidance and appears as a boiler-plate common attachment (or appendix) to all prefire plans.		
ACTION 1	Issue a Special Instruction for firefighting in moderation control areas; obtain NCSD technical review and written analysis/approval of the Special Instruction.	FEB 96	22 FEB 96
ACTION 2	Submit request for additional resources for the review and update of prefire plans. (Note: When resources are allocated, develop a prioritized schedule to update prefire plans and communicate results to the DOE Site Office.)	FEB 96	22 FEB 96
ACTION 3	Develop a lesson plan from the Special Instruction; obtain NCSD review/approval of the lesson plan; complete training.	MAR 96	16 APR 96
ACTION 4	Review Y50-50-409 and either revise or issue new command media in coordination with the NCSD to match how prefire plans are prepared. Ensure command media has clear and concise steps and includes firefighting requirements for exhaust systems.	JUN 96	14 AUG 96
ACTION 5	Assist the NCSD as subject-matter experts (SMEs) in firefighting with developing a section to the sitewide NCS Manual/Procedure that provides guidance to implement/comply with DOE 5480.24, Section 7.f requirements. This action supports NCSD's corrective actions for F02. (#Site will not be producing a sitewide NCS Manual. Instead NCSD Guidelines for fire fighting is contained in plant procedure YDD-708.)	JUN 97	Canceled# 18 APR 97
ACTION 6	Update existing prefire plans and train to updated plans in accordance with the sitewide NCS procedural requirements.	SEP 97	Canceled. See Action 5 Above
	LESSONS LEARNED		
F08	LMES' lessons learned program is deficient in measuring operational effectiveness and in integrating the program throughout the managem nuclear criticality safety.		
ACTION 1	Define line and staff organizations management responsibilities for identifying, evaluating, and sharing lessons learned.	APR 96	15 APR 96

REFERENCE NUMBER	CORRECTIVE ACTION PLAN (CAP) ITEM	PLANNED CLOSURE	ACTUAL DATE
ACTION 2	Identify lessons learned dissemination approaches.	APR 96	15 APR 96
ACTION 3	Reevaluate and reidentify realistic, internal clearinghouse activities to identify lessons learned.	APR 96	15 APR 96
ACTION 4	(Revision 1a) Identify feedback mechanisms for utilization and application of Lessons Learned information, e.g., procedural changes based on lessons, required reading status, and incorporation of lesson information in training programs. (Note: This action should have been included as part of the original CAP, but was inadvertently left out. It was, however, entered in ESAMS with original CAP actions and has been tracked with original actions.)	APR 96	15 APR 96
ACTION 5	Revise Lessons Learned Procedure, QA-16.3, to incorporate management, line, and staff responsibilities and dissemination approaches identified in associated action plan actions. (Note: QA-16.3 is being replaced with QA-331, <i>Lessons Learned Program.</i>)	AUG 96	30 SEP 96
ACTION 6	Communicate responsibilities as defined in procedure revision.	NOV 96	24 JUN 97
ACTION 7	Review implementation of QA-331, Lessons Learned Program.	MAR 97	2 SEP 97
F15	LMES has not fully addressed examples of Lessons Learned from oth Fuels Corp., Pantex facility, and Los Alamos National Laboratory TA Assessment Plan, Rev 1, October 1995.		
ACTION 1	Review events cited in finding for potential lessons learned and issue lessons learned as applicable.	APR 96	20 JUN 96
ACTION 2	Define line and staff organizations management responsibilities for identifying, evaluating, and sharing lessons learned.	APR 96	15 APR 96
ACTION 3	Identify lessons learned dissemination approaches.	APR 96	15 APR 96
ACTION 4	Reevaluate and reidentify realistic, internal clearinghouse activities to identify lessons learned.	APR 96	15 APR 96

REFERENCE NUMBER	CORRECTIVE ACTION PLAN (CAP) ITEM	PLANNED CLOSURE	ACTUAL DATE
ACTION 5	(Revision 1a) Identify feedback mechanisms for utilization and application of Lessons Learned information, e.g., procedural changes based on lessons, required reading status, and incorporation of lesson information in training programs. (Note: This action should have been included as part of the original CAP, but was inadvertently left out. It was, however, entered in ESAMS with original CAP actions and has been tracked with original actions.)	APR 96	15 APR 96
ACTION 6	Revise Lessons Learned Procedure, QA-16.3, to incorporate management, line, and staff responsibilities and dissemination approaches identified in associated action plan actions. (Note: QA-16.3 is being replaced with QA-331, <i>Lessons Learned Program.</i>)	AUG 96	30 SEP 96
ACTION 7	Communicate responsibilities as defined in procedure revision.	NOV 96	24 JUN 97
ACTION 8	Review implementation of QA-331, Lessons Learned Program.	MAR 97	2 SEP 97
	TRAINING		
F17	Maintenance, radiation control, technical support, and others who may direct or instruct operators do not receive sufficient training on the new and revised criticality safety approvals for unattended work in key areas. This finding is now addressed by the 94-4 Task 5 Corrective Action Plan Section 4.3. Facility specific training will be included in the qualification programs for support personnel.		
C18	Current training has not yet produced a safety culture among workers that prevents criticality safety deficiencies and ensures proper response if deficiencies occur.		

REFERENCE NUMBER	CORRECTIVE ACTION PLAN (CAP) ITEM	PLANNED CLOSURE	ACTUAL DATE
ACTION 1	(Revision 1a) Necessary elements for establishing the required safety culture are embodied in the 94-4 Task 4 and Task 5 CAPs. Establishment of ConOps program standards, ConOps training, and implementation are all addressed in the Task 4 CAP. Training and Qualifications are addressed in the Task 5 CAP. Activities related to resumption of nuclear operations are also under way that enhance the development of the required safety culture. Y-12 procedures Y70-150, Y70-160, and Y70-66-CS-327 are being revised to provide strategic direction on criticality safety requirements which will enhance the safety culture in this area. Assess the effectiveness of these actions under the Self Assessment	Task 4 CAP (Pages 5-7) Task 5 CAP	N/A
	Program per section I.D of the 94-4 Task 4 CAP, Rev 1. OPERATIONAL SAFETY REQUIREMENTS (OSRs)		
F06	OSRs or Technical Safety Requirements (TSRs) have not been approved (or developed) for Buildings 9720-33 and 9995. None of these buildings have DOE approved Safety Analysis Reports (SARs).		
ACTION 1	Review the 1027-92 hazard category for Building 9720-33 and confirm the facility is not a nuclear facility.	FEB 96	9 FEB 96
ACTION 2	Per the current implementation plan schedule for DOE Orders 5480.22 and 5480.23, submit the Building 9995 SAR.	NOV 96	18 NOV 96
ACTION 3	(Revision 1a) Submit a revision to the Y-12 input for the Implementation Plan for DOE Orders 5480.22 and 5480.23. (Note: This plan will indicate task durations and cost estimates, but will not include specific start and completion dates. Also, the 9212 portion of this action will not be delivered at this date, due to the expanded development of the 9212 BIO/OSR for restart.) [Action 4 addresses supplemental documentation concerning schedule	SEP 96 (Partial)	1 OCT 96
	dates.] Bldg. 9212 portion of this action.	DEC 96	31 DEC 96

2.3: CORRECTIVE ACTION PLAN FOR TASK 2 ASSESSMENT (LMES letter to R.J. Spence dated January 30, 1996.)

(Revision 1a, YSO letter to D. Rhoades dated October 28. 1996)

REFERENCE NUMBER	CORRECTIVE ACTION PLAN (CAP) ITEM	PLANNED CLOSURE	ACTUAL DATE
ACTION 4	(Revision 1a) Provide a supplement to the Y-12 input for the Implementation Plan for DOE Orders 5480.22 and 5480.23. This supplement will identify projected start and completion dates associated with upgrade of the Y-12 Summary of Safety Bases to be compliant with 5480.23/22. The costs associated with the schedules provided in this supplement will be submitted via funding requests in the Y-12 budget process.	MAR 97	28 MAR 97
ACTION 5	Prepare SAR for Building 9720-5	SEP 97	3 OCT 97
F09	Problems exist with (1) safety analyses and authorization bases to support safety and other important programs throughout Y-12, (2) clarity of safety bases for newly approved OSRs, (3) quality of OSRs for Enriched Uranium Operations, and (4) implementation of OSRs with respect to criticality safety. The absence of a systematic analysis and hazards review results in a poorly defined safety envelope. The current system may lead to violations of OSRs and DOE requirements, even if facility safety is not significantly threatened.		
ACTION 1	(Revision 1a) Submit a revision to the Y-12 input for the Implementation Plan for DOE Orders 5480.22 and 5480.23. (Note: This plan will indicate task durations and cost estimates, but will not include specific start and completion dates. Also, the 9212 portion of this action will not be delivered at this date, due to the expanded development of the 9212 BIO/OSR for restart.) [Action 4 addresses supplemental documentation concerning schedule dates.]	SEP 96 (Partial)	1 OCT 96
	Bldg. 9212 portion of this action.	DEC 96	31 DEC 96

2.3: CORRECTIVE ACTION PLAN FOR TASK 2 ASSESSMENT (LMES letter to R.J. Spence dated January 30, 1996.)

(Revision 1a, YSO letter to D. Rhoades dated October 28. 1996)

REFERENCE NUMBER	CORRECTIVE ACTION PLAN (CAP) ITEM	PLANNED CLOSURE	ACTUAL DATE
ACTION 2	(Revision 1a) Issue to Y-12 Site Office for review the Y-12 Summary of Safety Bases. (Note: This will not be fully compliant with DOE Orders 5480.23/22 when issued [i.e. it will be a compilation of existing safety documentation with no new analysis performed], but will serve as a framework for future improvements. Also, the 9212 portion of this action will not be delivered at this date, due to the expanded development of the 9212 BIO/OSR for restart.)	SEP 96 (Partial)	1 OCT 96
	Bldg. 9212 portion of this action.	DEC 96	31 DEC 96
ACTION 3 A71342 A71343 A71344 A71345 A71346	(Revision 1a) Submit Basis for Interim Operations (BIOs) for nuclear facilities for review and approval to DOE. BIOs submitted to DOE on schedule, but were rejected. Resubmission schedule: a. Bldg. 9204-4 b. Bldgs. 9201-5; 9201-5N/W; 9204-2E; and 9720-5 c. Bldgs. 9212 and 9215 d. Bldgs. 9206 and 9720-12 e. Bldg. 9720-18	a AUG 96 b SEP 96 c OCT 96 d -MAY 98 e JAN 97	a 31 AUG 96 b 30 SEP 96 c 31 OCT 96 (9212) d. eSubmitted to DOE 9/97
ACTION 4	(Revision 1a) Provide a supplement to the Y-12 input for the Implementation Plan for DOE Orders 5480.22 and 5480.23. This supplement will identify projected start and completion dates associated with upgrade of the Y-12 Summary of Safety Bases to be compliant with 5480.23/22. The costs associated with the schedules provided in this supplement will be submitted via funding requests in the Y-12 budget process.	MAR 97	28 MAR 97
ACTION 5	Prepare SAR for Building 9720-5.	SEP 97	3 OCT 97
C04	OSRs for Buildings 9212 and 9206 should be updated to current DOE requirements prior to resumption of operations in those nuclear facilities.		
ACTION 1	Verify that an RFA exists that requires Category II facilities having new OSRs prior to resumption of operations.	JAN 96	31 JAN 96
C05	LMES has nuclear facilities (e.g., Buildings 9995, 9202/9203, and 98 authorization basis (e.g., no SARs, OSRs, or BIOs).	805) which do not ha	ve an approved

TABLE VI

2.3: CORRECTIVE ACTION PLAN FOR TASK 2 ASSESSMENT (LMES letter to R.J. Spence dated January 30, 1996.) (Revision 1a, YSO letter to D. Rhoades dated October 28. 1996)

REFERENCE NUMBER	CORRECTIVE ACTION PLAN (CAP) ITEM	PLANNED CLOSURE	ACTUAL DATE
ACTION 1	(Revision 1a) Submit a revision to the Y-12 input for the Implementation Plan for DOE Orders 5480.22 and 5480.23. (Note: This plan will indicate task durations and cost estimates, but will not include specific start and completion dates. Also, the 9212 portion of this action will not be delivered at this date, due to the expanded development of the 9212 BIO/OSR for restart.) [Action 2 addresses supplemental documentation concerning schedule dates.]	SEP 96 (Partial)	1 OCT 96
	Bldg. 9212 portion of this action.	DEC 96	31 DEC 96
ACTION 2	(Revision 1a) Provide a supplement to the Y-12 input for the Implementation Plan for DOE Orders 5480.22 and 5480.23. This supplement will identify projected start and completion dates associated with upgrade of the Y-12 Summary of Safety Bases to be compliant with 5480.23/22. The costs associated with the schedules provided in this supplement will be submitted via funding requests in the Y-12 budget process.	MAR 97	28 MAR 97
ACTION 3	Prepare SAR for Building 9720-5.	SEP 97	3 OCT 97

Table VII

3.3: CORRECTIVE ACTION PLAN FOR TASK 3.2 ASSESSMENT (LMES letter to R.J. Spence dated January 30, 1996.) (Revision 1, YSO letter to D. Rhoades dated October 28, 1996)

REFERENCE NUMBER	CORRECTIVE ACTION PLAN (CAP) ITEM	PLANNED CLOSURE	ACTUAL DATE
NCS 2-16	Procedure Y70-01-150 Sect. VI.A.4.d states "actual fissile storage array dimensions shall not exceed CSA dimensions by more than six inches."		
ACTION 1	Using a team of operations managers, NCS managers, procedure managers, and DOE Site Office personnel, benchmark other NCS programs in the DOE complex (minimum of 3).	FEB 96	8 MAR 96
ACTION 2	Prepare trip report from benchmarking trips.	FEB 96	8 MAR 96
ACTION 3	From trip report, develop needed improvement areas and approach. This improvement plan needs to consider at a minimum the incorporation of divisional-level general criticality safety procedures, such as Y70-01-150, into a site-level document controlled by Nuclear Criticality Safety Department (NCSD). (Revision 1) Develop an implementation plan to execute the improvement plan specifics. Include any phasing of changes and any required retraining/requalification needed. (Note: Specific action assignments will involve tasking of facilities to execute requirements. This Corrective Action Plan may require update after the completion of Action 3.)	NOV 96	30 NOV 96
ACTION 4	Based on review in Action 3 and implementation plan, draft needed changes to procedures/new procedures to improve the noted area.	FEB 97	15 MAY97
ACTION 5	Forward copy of site manual/new procedures to DOE Site Office.	MAR 97	15 MAY 97
ACTION 6	Develop a plant group (similar in composition to benchmarking group) to assess effectiveness of implementation plan.	MAY 97	7 MAY 97
NCS 3-8	Y-12 has not formally identified this noncompliance [criticality control but they have not been included in operating procedures (Y/NO-0000 documented corrective actions to meet this requirement for all applications).	9 App. A pg 12)] no	r adequately
ACTION 1	Issue joint Y-12 Plant/Nuclear Operations letter invoking the compensatory measure required plant wide for criticality related procedures which do not have CSA limits and conditions included.	MAY 96	CANCELED
ACTION 2	Develop implementation plans for upgrading technical procedures per the new Technical Procedures Writer's Guide, Y10-103, including the addition of applicable safety controls for all organizations that have CSAs (DSO).	MAY 96	JAN 97#

Table VII

3.3: CORRECTIVE ACTION PLAN FOR TASK 3.2 ASSESSMENT (LMES letter to R.J. Spence dated January 30, 1996.)

(Revision 1, YSO letter to D. Rhoades dated October 28, 1996)

REFERENCE NUMBER	CORRECTIVE ACTION PLAN (CAP) ITEM	PLANNED CLOSURE	ACTUAL DATE
ACTION 3	Develop implementation plans for upgrading technical procedures (Quality Organization).	MAY 96	JAN 97#
ACTION 4	Develop implementation plans for upgrading technical procedures(Analytical Services Organization (ASO)).	MAY 96	JAN 97#
ACTION 5	Develop implementation plans for upgrading technical procedures(Waste management Organization).	MAY 96	JAN 97#
	ures for these areas were upgraded as part of restart and/or continued op as were developed. These items will be closed in ESAMS January 97.	peration activities the	refore no separate
ACTION 6	Develop implementation plans for upgrading technical procedures(Enriched Uranium Operations Organization).	MAY 96	18 SEP 96
NCS 3-9B & 3-10	The 9720-5 Warehouse postings for array storage areas do not post th (NCSA) limits. The postings list the applicable NCSA number for the		
ACTION 1	Using a team of operations managers, NCS managers, procedure managers, and invited DOE Site Office personnel, benchmark other NCS programs in the DOE complex (minimum of 3).	FEB 96	8 MAR 96
ACTION 2	Prepare trip report from benchmarking trips.	FEB 96	8 MAR 96
ACTION 3	From trip report, develop needed improvement areas and approach. This improvement plan needs to consider at a minimum the following: (1) Review use of postings as operator aids. (2) Requirements of ANSI 8.1, section 4.1.4, that postings shall be maintained specifying material identification and all limits that are subjected to procedural control. (Revision 1) Develop an implementation plan to execute the improvement plan specifics. Include any phasing of changes and any required retraining/requalification needed. (Note: Specific action assignments will involve tasking of facilities to execute requirements. This Corrective Action Plan may be updated after	NOV 96	30 NOV 96
	the completion of Action 3.)		
ACTION 4	Based on review in Action 3 and implementation plan, draft needed changes to procedures/new procedures to improve the noted area.	FEB 97	15 MAY 97
ACTION 5	Forward copy of site manual/new procedures to DOE Site Office.	MAR 97	15 MAY 97

Table VII

3.3: CORRECTIVE ACTION PLAN FOR TASK 3.2 ASSESSMENT (LMES letter to R.J. Spence dated January 30, 1996.) (Revision 1, YSO letter to D. Rhoades dated October 28, 1996)

REFERENCE NUMBER	CORRECTIVE ACTION PLAN (CAP) ITEM	PLANNED CLOSURE	ACTUAL DATE
ACTION 6	Develop a plant group (similar in composition to benchmarking group) to assess effectiveness of implementation plan.	MAY 97	7 MAY 97
NCS 3-10	Procedure Y70-01-150, VI.A.4.g , states "Fissile storage arrays shall CSA)".	be conspicuously po	sted (if required by
ACTION 1	The NCSD conduct a review of Procedure Y70-01-150 for additional cases where exemptions from regulations are annotated.	MAR 96	21 MAR 96
ACTION 2	Revise Procedure Y70-01-150, Section VI.A.4.g, to remove the text "(if required by CSA)" and any additional areas determined by NCSD review as possible exemptions from regulations.	MAY 96	12 JUL 96
NCS 3-15	Supervisor training has not been provided in a programmatic fashion.		
ACTION 1	Using a team of operations managers, NCS managers, procedure managers, and invited DOE Site Office personnel, benchmark other NCS programs in the DOE complex (minimum of 3).	FEB 96	8 MAR 96
ACTION 2	Prepare trip report from benchmarking trips.	FEB 96	8 MAR 96
ACTION 3	From trip report, develop needed improvement areas and approach. This improvement plan needs to consider at a minimum the following: (1) Review of criticality safety training practices to "provide" training for improvement areas, NCSD, operations managers, operations supervisors, support personnel, front line supervisors, and operators. (2) Ensure DOE requirements for training are included in the program.	NOV 96	30 NOV 96
	(Revision 1) Develop an implementation plan to execute the improvement plan specifics. Include any phasing of changes and any required retraining/requalification needed. (Note: Specific action assignments will involve tasking of facilities to execute requirements. This Corrective Action Plan will be updated after the completion of Action 3.)		
ACTION 4	Based on review in Action 3 and implementation plan, draft needed changes to procedures/new procedures to improve the noted area.	FEB 97	15 MAY 97
ACTION 5	Forward copy of site manual/new procedures to DOE Site Office.	MAR 97	15 MAY 97
ACTION 6	Develop a plant group (similar in composition to benchmarking group) to assess effectiveness of implementation plan.	MAY 97	7 MAY 97

Table VII

3.3: CORRECTIVE ACTION PLAN FOR TASK 3.2 ASSESSMENT (LMES letter to R.J. Spence dated January 30, 1996.) (Revision 1, YSO letter to D. Rhoades dated October 28, 1996)

REFERENCE NUMBER	CORRECTIVE ACTION PLAN (CAP) ITEM	PLANNED CLOSURE	ACTUAL DATE
NCS 6-34	Instructions are not posted as required by ANS 8.3 and ESS-CS-101	for response to the si	gnals.
ACTION 1	The NCSD shall verify the requirements of ANSI/ANS 8.3 are properly reflected in the central procedure ESS-CS-101 as invoked by Y70-150.	MAR 96	22 MAR 96
ACTION 2	Emergency Management shall ensure adequate instructions exist on the physical requirements for evacuation signs. For example, maximum spacing.	MAR 96	10 APR 96
ACTION 3	Nuclear Operations shall: (a) Ensure facility compliance with posting requirements stated in paragraphs 1 and 2. (b) Ensure postings are controlled in a program such as operator aids. (c) Ensure evaluation of posting control is incorporated into internal self assessment program for the facilities. (# Per procedure Y70-159, Operations are allowed a maximum of six months from the date of issue (Sep 96) to comply with posting requirements.)	MAR 97#	28 MAR 97
ACTION 4	Waste Management shall: (a) Ensure facility compliance with posting requirements stated in paragraphs 1 and 2. (b) Ensure postings are controlled in a program such as operator aids. (c) Ensure evaluation of posting control is incorporated into internal self assessment program for the facilities.	AUG 96	19 AUG 96
ACTION 5	The ASO shall: (a) Ensure facility compliance with posting requirements stated in paragraphs 1 and 2. (b) Ensure postings are controlled in a program such as operator aids. (c) Ensure evaluation of posting control is incorporated into internal self assessment program for the facilities.	AUG 96	19 SEP 96
ACTION 6	Periodically during evacuation drills evaluate effectiveness of evacuation postings.	MAY 96	30 APR 96

TABLE VIII

4.3: CORRECTIVE ACTION PLAN FOR TASK 4 ASSESSMENTS OF CONDUCT OF OPERATIONS AT Y-12 (Revision 1, YSO letter to D. Rhoades dated October 28, 1996)

REFERENCE NUMBER	CORRECTIVE ACTION PLAN (CAP) ITEM	PLANNED CLOSURE	ACTUAL DATE
I	LMES CONDUCT OF OPERATIONS PROGRAM		
I.A	CONOPS PROGRAM DOCUMENTATION (This is a "new" section that combines "Standards" and "Tools" into one section. (Revision 1))		
	SUBMIT REQUIRED APPLICABILITY MATRICES		
I.A.1 A66998 A67000 A66999 A67001 A67002 A67003	Submit CONOPS Applicability Matrix to DOE. a. Site b. DSO/DUO (resumed) c. EUO (non-resumed) d. Support e. Balance of Plant	a - FEB 96 b - MAR 96 c - MAR 96 d - MAR 96 e - JAN 97	a - 11 JUL 96 b - 8 MAR 96 c - 19 APR 96 d - SEP 96 e - JAN 97
I.A.2 A67004	YSO approve Applicability Matrices.	Receipt + 30 days	a - AUG 96 b - 19 JUL 96 c - 8 MAY 96 d - NOV 96 e - 13 MAY 97
	ISSUE CONOPS MANUAL AND SUPPORTING GUIDANCE		
I.A.3 A67005	Issue draft generic roles and responsibilities of operations (facility) managers, specifically safety and emergency systems, in Conduct of Operations Manual, Chapter 1.	FEB 96	5 JUN 96
I.A.4.a A67006	Issue a Draft Site CONOPS Manual for review and comment. The manual defines the site organization and establishes conduct of operations standards. The manual will be supported by new or revised LMES procedures for those chapters requiring procedural discipline in the execution of the standards.	MAR 96	10 APR 96
I.A.4.b A67007	Approve and issue Site CONOPS Manual.	MAY 96	OCT 96
I.A.5 A67022	Define fire suppression system and Criticality Accident Alarm System ownership for operations managers.	MAR 96	5 JUN 96
I.B.1 A67023 A67024	Define the specific roles and responsibilities of the Operations Managers in Nuclear Facilities and in Balance of Plant Facilities.	APR 96	OCT 96

4.3: CORRECTIVE ACTION PLAN FOR TASK 4 ASSESSMENTS OF CONDUCT OF OPERATIONS AT Y-12 (Revision 1, YSO letter to D. Rhoades dated October 28, 1996)

REFERENCE NUMBER	CORRECTIVE ACTION PLAN (CAP) ITEM	PLANNED CLOSURE	ACTUAL DATE
I.B.2 A67025	Identify the specific zones and facilities at the site to which Operations Managers will be assigned.	JUN 96	OCT 96
I.B.3 A67026 A67027	Assign Operations Managers for each Zone/Facility.	AUG 96	OCT 96
I.D.1 A67053	Cancel obsolete site-level CONOPS procedures that are superseded by the Site CONOPS Manual. These old procedures are standards whose contents will be "rolled in" as requirements to the manual.	OCT 96	OCT 96
I.D.2 A67055	Review any existing site-level CONOPS procedures that will be retained for achieve consistency with the CONOPS Manual; coordinate revision as necessary.	MAR 97	14 MAY 97
	DEVELOP CONOPS PERFORMANCE INDICATORS		
I.B.4 A67028	Obtain and review examples of CONOPS performance indicators (PIs) used at other sites such as Rocky Flats, SRS, Pantex.	FEB 96	19 MAR 96
I.B.5 A67029	Define PIs for the Site. Establish PIs reported to YSO.	JAN 97	JAN 97
I.B.6 A67030	YSO approve proposed PIs to be reported.	FEB 97	MAY 97
	DEVELOP REQUIRED REQUESTS FOR APPROVAL		
I.D.3.4.a A67061	Approve RFA # 162 (EUO).	FEB 96	9 MAY 96
I.D.3.5.a A67063	Prepare/submit RFA for QE (supersede COO implementation as defined by the current Standards & Controls Management Plan).	JUL 96	9 JUL 96
I.D.3.5.b A67064	Approve RFA # 165 for QE.	AUG 96	6 AUG 96
I.D.3.6.a A67066	Revise RFA # 161 (Support Organizations).	DEC 96	JAN 97
I.D.3.6.b A67069	Approve RFA # 161 (Support Organizations). *Disapproved by DOE . Resubmit RFA in February 1998.	*FEB 98	

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REFERENCE NUMBER	CORRECTIVE ACTION PLAN (CAP) ITEM	PLANNED CLOSURE	ACTUAL DATE
I.D.3.7.a A67073	Revise RFA # 163 (Balance of Plant).	FEB 97	APR 97
I.D.3.7.b A67076	Approve RFA # 163 (Balance of Plant).	MAR 97	MAY 97
I.D.3.8.a A67078	Revise RFA # 164 (Sitewide).	MAR 96	SEP 96
I.D.3.8.b A67079	Approve RFA # 164 (Sitewide).	NOV 96	OCT 96
I.D.3.9 A67081	Cancel RFA # 85 (superseded by RFA 164).	MAR 96	SEP 96
I.B	TRAINING PROGRAM FOR CONDUCT OF OPERA	ΓIONS	
	INITIAL CONOPS TRAINING - Nuclear and Nuclear Support Organizations		
I.C.1 A67031	Prepare line manager CONOPS implementation training for each chapter of the Conduct of Operations Manual.	JUL 96	completed as part of each RESTART
I.C.2 A67032 A67033 A67034 A67035	Conduct line manager CONOPS implementation training for: a. Resumed Nuclear Operations b. Non-resumed Nuclear Operations c. Support organizations - Canceled see Task 5, TAT 4-1 action 4 d. Balance of Plant organizations - Canceled see Task 5, TAT 4-1 action 4	a - AUG 96 b - SEP 96 c - Canceled d -Canceled	a - MAR 96 b - SEP 96
	ONGOING CONOPS TRAINING - Site-level training for all Organizations		
	This training is based on a program that "flows down" from regularly scheduled awareness sessions conducted by the Vice President through the organization managers, and line managers to all employees on site. These awareness sessions will be structured around the site-level conduct of operations manual.		
I.C.3 A67036	Prepare operator CONOPS implementation training	SEP 96	SEP 96

TABLE VIII

4.3: CORRECTIVE ACTION PLAN FOR TASK 4 ASSESSMENTS OF CONDUCT OF OPERATIONS AT Y-12 (Revision 1, YSO letter to D. Rhoades dated October 28, 1996)

REFERENCE NUMBER	CORRECTIVE ACTION PLAN (CAP) ITEM	PLANNED CLOSURE	ACTUAL DATE
I.C.4 A67037 A67039 A67038 A67040	Conduct operator CONOPS implementation training for: a. Resumed Nuclear Operations b. Non-resumed Nuclear Operations c. Support organizations - Canceled see Task 5, TAT 4-1 action 5 d. Balance of Plant organizations - Canceled see Task 5, TAT 4-1 action 5	a - OCT 96 b - OCT 96 c - Canceled d - Canceled	a - MAR 96 b - SEP 96
I.C.5	Ongoing Floor Training - (Revision 1) - This section has CAP. Ongoing training must be integrated with the site-5480.20A. Requirements for on the job training are important and qualification program and will be tracked via Qualification) CAP.	level implementa lemented throug	ation of h the site
I.C	CONOPS IMPLEMENTATION		
	IMPLEMENT CONDUCT OF OPERATIONS in the organizations in accordance with the approved Requests for Approval (RFAs). (Note: "Implemented" is defined as having established programs and implementing procedures, personnel have been trained to the procedures, and the procedures are in use in the facility. "Fully implemented" is defined as having a mature CONOPS program and having completed two full cycles of conops assessments in the facility and having corrected deficiencies from the assessments.)		
I.D.3.1 A67058	Implement RFA # 137C (RSS).	APR 96	15 MAY 96
I.D.3.2 A67059	Implement RFA # 147C (DUO).	MAR 96	26 APR 96
I.D.3.3 A67060	Implement RFA # 160B (D&A).	DEC 96	MAY 96
I.D.3.4.b A67062	Implement RFA # 162 B (EUO).	NOV 96	6 DEC 96
I.D.3.5.c A67065	Implement RFA #165 (QE).	JAN 97	20 NOV 96
I.D.3.6.c A67071	Implement RFA # 161A (Support Organizations). *Disapproved by DOE. Resubmit RFA in February 1998.	*FEB 98	

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REFERENCE NUMBER	CORRECTIVE ACTION PLAN (CAP) ITEM	PLANNED CLOSURE	ACTUAL DATE
I.D.3.7.c A67077	Implement RFA # 163A (Balance of Plant). *Revised based on RFA 161A results.	*APR 98	
I.D.3.8.c A67080	Implement RFA # 164A (Sitewide). *Revised based on RFA 161A results.	*APR 98	
I.D	CONOPS ASSESSMENT PROGRAM		
	IMPLEMENT A MANAGEMENT SELF- ASSESSMENT PROGRAM FOR CONOPS		
I.E.1.a A67082	Develop standards for a site-wide CONOPS assessment program (based on SRS Management Self-Assessment Program, including lessons learned from the DSO and EUO assessment programs).	NOV 96	NOV 96
I.E.2.b A67090	Develop generic cards or checklists for use during management assessments in Nuclear Operations. Assessment cards should include the Elements of 5480.19.	NOV 96	NOV 96
NEW A72569*	Develop generic cards or checklists for use during management assessments in Balance of Plant Facilities. Assessment cards should include the Elements of 5480.19.	JAN 97	JAN 97
I.E.3.c A67093	Develop training for line management on performance based assessment techniques.	AUG 96	AUG 96
I.E.3.d A67094	Train nuclear operations and support line management on performance based assessment techniques.	Cancel - See Task 5, TAT 4.6 action 3	N/A
I.E.4.b A71314	Nuclear organizations complete initial conduct of operations assessments. (Complete a full cycle of the assessments, e.g. all applicable chapters):		
	 a. Receipt Shipment and Storage b. Disasembly and Assembly c. Depleted Uranium d. Quality Evaluation e. Enriched Uranium 	a - DEC 96 b - DEC 96 c - DEC 96 d - DEC 96 e - DEC 96	a - DEC 96 b - DEC 96 c - DEC 96 d - DEC 96 e - DEC 96

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REFERENCE NUMBER	CORRECTIVE ACTION PLAN (CAP) ITEM	PLANNED CLOSURE	ACTUAL DATE
NEW A67097	Nuclear Support organizations complete initial conduct of operations assessments. (Complete a full cycle of the assessments, e.g. all applicable chapters): a. Plant Shift Superintendent b. FMO - Power Operations c. FMO - Defense Programs d. FMO - Utilities e. Radiological Control Dept. f. Fire Department g. Nuclear Criticality Safety Dept.	a - AUG 97 b - AUG 97 c - AUG 97 d - AUG 97 e - AUG 97 f - AUG 97 g - AUG 97	a - AUG 97 b - AUG 97 c - AUG 97 d - AUG 97 e - AUG 97 f - AUG 97 g - AUG 97
	IMPLEMENT A SITE-LEVEL ASSESSMENT PROGRAM		
I.E.2.a A67089	Revise Y60-028 to incorporate assessment requirements for 5480.19 and to reference the new Standard on the performance of management assessments of conops implementations.	SEP 96	SEP 96
I.E.3.b A67092	Identify who needs to be trained and conduct initial round of training for revised Y60-028.	MAR 97	8 MAY 97
I.E.4.a A67095 A67096	Submit assessment plans and schedules for CONOPS assessments in Nuclear Operations and Support organizations per revised Y60-028. #Action rolled into Action No. A67095	MAY 97	28 AUG 97#
I.E.4.f A67101	Complete an independent assessment of compliance with Y60-028.	DEC 97	*DEC 97
I.E.4.g A67102	Revise Y60-028 and guidance if needed based on independent assessment results.	MAR 98	
	PERFORM INDEPENDENT ASSESSMENTS OF THE CONOPS PROGRAM		
I.E.1.c A67084	Conduct independent assessment to evaluate the level of COO implementation in NucOps including support organizations.	AUG 97	AUG 97
I.E.1.e A67086	Revise COO CAP as needed based upon the results of the independent assessments. #Assessment was completed 8/97. CAP currently being revised. *Issues in CAP still being worked.	*FEB 98	

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REFERENCE NUMBER	CORRECTIVE ACTION PLAN (CAP) ITEM	PLANNED CLOSURE	ACTUAL DATE
I.E.1.f A67087	Conduct site-wide independent assessment to evaluate the level of COO implementation. (Note: The scope of this assessment will be limited to the organizations where CONOPS has been implemented per this CAP.)	NOV 97	*NOV 97
I.E.1.g A67088	Revise COO CAP based upon the results of the independent assessments.	MAR 98	
II	ADDITIONAL IMPROVEMENT AREAS		
II.A	TRAINING - The entire section on training and qualification 94-4 Task 4 CAP to the 94-4 Task 5 CAP.	tion has been m	oved from the
II.B	DRILL PROGRAM		
II.B.1.a A67169	Hire an experienced Drill Program Manager.	NOV 95	28 NOV 95
II.B.1.b A67172	Develop a Drill Program Plan for DSO facilities for CY 1996.	MAR 96	24 MAY 96
II.B.1.c A67171	Develop a Drill Program Procedure for Nuclear Operations per 5480.20A. (Note: Balance of Plant is covered by Site Emergency Preparedness Procedures.)	APR 96	17 JUN 96
II.B.2.a A67198	Develop an initial set of Drill Guides for DSO facilities. (Note: Complete for 3 DSO facilities. This is an ongoing process; guides are developed as necessary to support facility activities.	ONGOING	31 MAY 96
NEW A67199	Commence development of Drill Program Tools in EUO. Tools may include: guides, a list of the types/categories of drills, drill scenarios, and simulation devices.	JAN 98	*4 DEC 97
II.B.3.a A67201	Train DSO personnel and drill coordinators on conduct of drills.	JAN 96	24 MAY 96
II.B.3.b A67204	Train EUO organization and Facility Drill Coordinators on conduct of drills.	JAN 98	*21 MAY 97
II.B.3.c A0067206 I0029550	Train EUO and Support personnel on conduct of drills.	JAN 98	*21 MAY 97

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REFERENCE NUMBER	CORRECTIVE ACTION PLAN (CAP) ITEM	PLANNED CLOSURE	ACTUAL DATE
II.B.4.a A67210	Commence drills in DSO based on the schedule of 2 per month.	JAN 96	24 MAY 96
II.B.4.b A67211	Commence drills in EUO facilities per schedules defined in facility drill programs.	APR 98	
II.B.5.a A67214	Drill Program Assessment: Commence observation of the execution of drills in DSO and provide feedback to facility and line managers. (This is a continuous process that is built into the Drill Program.)	JAN 96	24 MAY 96
II.C	ISSUES MANAGEMENT		
II.C.1.a A67175	Establish an Issues Manager for the Y-12 LMES Organization.	DEC 95	29 MAR 96
II.C.1.b A67174	Establish process to assign responsibility for distribution and follow-up of DOE Monthly Assessment Report with the YSO.	DEC 95	14 JUN 96
II.C.2.a A67176	Revise LMES Corrective Action Planning procedures to prohibit the development of an action plan as the only action of a CAP task.	MAR 96	29 APR 96
II.C.2.b A67177	Revise the CAP for the DOE RA finding in RSS MG3-2 to comply with the revised LMES Corrective Action Planning procedures.	JAN 96	3 JUN 96
II.C.2.c A67178	Review/Approve the CAP for the DOE RA finding in RSS MG3-2.	MAR 96	31 MAY 96
II.C.3.a/b A67179 A67180	Provide a briefing to Y-12 managers that outlines the process for responding to the DOE Monthly Assessment Report and emphasizes the importance of understanding the programmatic issues and addressing the issues with follow-up: a. organization managers b. line and facility managers	a - APR 96 b - JUN 96	26 APR 96 17 JUN 96
II.C.5.a A67183	Evaluate the effectiveness of the corrective action process at Y-12, including the issues prioritization process.	AUG 96	3 SEP 96
NEW A66737	Schedule and perform assessments of corrective action implementation.	DEC 96	MAR 97
II.D	RADIOLOGICAL CONTROL		
II.D.1	Root Cause: Management System; Standards, Policies, or Administrative Controls (SPAC) not used.		

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REFERENCE NUMBER	CORRECTIVE ACTION PLAN (CAP) ITEM	PLANNED CLOSURE	ACTUAL DATE
II.D.1.a A67217	Establish and implement general requirements for the use of anti- contamination clothing.	DEC 95	7 DEC 95
II.D.1.b A67218	Develop a Required Reading for the Y-12 Plant that consists of recent plant wide RadCon deficiencies.	FEB 96	29 APR 96
II.D.1.c A67219	Incorporate RadCon deficiencies of II.D.1.b into Radiological Worker II training.	JUN 96	16 MAY 96
II.D.1.d A67220	Develop Required Reading for RadCon Department personnel that consists of recent deficiencies in radiological control practices.	FEB 96	29 APR 96
II.D.1.e A67221	Incorporate RadCon deficiencies contained in II.D.1.b and d into the Radiological Control Technician Continuing Training Program.	MAR 96	29 APR 96
II.D.1.f A67222	Conduct refresher Radiological Worker II training for all radiological workers.	DEC 97	16 APR 97
II.D.2	Root Cause: Management System; SPAC less than adequate; No SPAC.		
II.D.2.a A67225	Obtain representative samples of vegetation from outdoor contamination areas and analyze for contamination.	APR 96	9 MAY 96
II.D.2.b A67226	Issue appropriate recommendation to line organizations after obtaining sample results.	MAY 96	30 MAY 96
II.D.2.c A67227	RadCon Manager make formal presentation to senior management concerning status of uncontained outdoor radioactive storage area. Based on their direction, risks, and available funds, a remediation/mitigation plan will be developed.	JUL 96	19 AUG 96
II.D.2.d A67228	Revise and implement procedure Y60-66-RC-600, "Radiological Control Surveillance Program".	DEC 95	1 DEC 95
II.D.3	Root Cause: Management System; Corrective Action not yet implemented.		
II.D.3.a A67230	Hire additional Radiological Control Techs to meet requirements.	SEP 96	19 AUG 96
II.D.3.b A67231	Relocate key managers responsible for oversight of RadCon program implementation to the protected area to improve RadCon/Line Organization interaction.	JUN 96	25 JUN 96
II.E	MAINTENANCE		

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REFERENCE NUMBER	CORRECTIVE ACTION PLAN (CAP) ITEM	PLANNED CLOSURE	ACTUAL DATE
II.E.2.a A67232	Publish "Guideline to Good Practices for Y-12 Maintenance" for maintenance groups, implementing DOE 4330.4B ch-2, and applicable chapters of DOE 5480.19.	MAR 96	10 APR 96
II.E.2.b A67260	Review FMO data to identify additional PIs needed for implementation of CONOPS.	JUL 96	16 JUL 96
II.E.2.c A67261	Update Maintenance PIs to include COO elements.	AUG 96	7 AUG 96
II.E.2.d A67262	Revise work control procedures as needed to fully implement "Guidelines to Good Practices for Y-12 Maintenance".	DEC 96	18 DEC 96
II.E.3.a A67263	Develop lesson plan for each element of "Guidelines to Good Practices for Y-12 Maintenance".	JUN 96	13 JUN 96
II.E.3.b A67264	Conduct training on the elements of "Guidelines to Good Practices for Y-12 Maintenance".	DEC 96	FEB 97
II.E.4.a A67265	Complete the Preventive Maintenance Program improvement project. The project validates PM requirements, eliminating low value maintenance and reducing overdue backlog.	JUN 96	13 JUN 96
II.E.5.a A67266	Assess the implementation of "Guidelines to Good Practices for Y-12 Maintenance" to identify areas of noncompliance.	SEP 97	29 SEP 97
II.E.5.b A67267	Resolve resulting issues (II.E.5.a).	ASMNT RPT +1 MON	*31 OCT 97
II.F	OCCURRENCE REPORTING PROGRAM		
II.F.1.a A67269	Revise Procedure Y60-161 (subsequently replaced by procedure Y10-192) to include all of the categorization criteria listed in DOE 232.1.	JAN 96	30 APR 96
II.F.1.b A67270	Disseminate to the Facility Managers/Designees a memorandum which discusses the importance of reporting through the DOE 232.1 system items which are collectively significant.	FEB 96	30 APR 96
II.F.1.c A67271	DOE (YSO) approve revised procedure Y10-192 and forward to DOE-HQ for approval.	MAR 96	JUL 96
II.F.3.a A67272	Conduct an awareness session for facility managers or their designees to the DOE 232.1 categorization criteria.	FEB 96	2 MAY 96
II.F.5.a A67268	Conduct a surveillance to assess compliance with procedural categorization requirements of Y60-192.	JUL 96	12 AUG 96

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REFERENCE NUMBER	CORRECTIVE ACTION PLAN (CAP) ITEM	PLANNED CLOSURE	ACTUAL DATE
II.G	FIRE PROTECTION		
II.G.1.a A67273	Revise procedure Y50-50-313 or develop other command media for annual maintenance of fire extinguishers.	OCT 96	OCT 96
II.G.1.b A67274	Develop and issue command media or required reading to document that fire extinguishers will be controlled at Y-12 through the Fire Protection Program.	OCT 96	OCT 96
II.G.2.a A71355	Develop a bar code system into a new fire inspection and maintenance information system for identifying and locating fire extinguishers.	MAR 97	MAR 97
II.G.2.b A67276	Develop and issue command media or required reading (to include a records checklist) for monthly visual inspection of fire extinguishers for Building Managers.	NOV 96	10 JAN 97
II.G.2.c A71358	Procure necessary equipment (bar code readers, etc.) to support program improvements.	FEB 97	FEB 97
II.G.2.d A67278	Develop required reading for fire extinguishers education at Y-12.	MAR 97	OCT 96
II.G.3.a A71112*	Train Fire Department personnel to revised procedure for annual maintenance of fire extinguishers.	MAY 97	9 JUL 97
II.G.4.a A71363	Implement bar code ID system.	SEP 97	3 OCT 97
II.G.4.b A71360	Perform surveillances of implementation of monthly inspections of fire extinguishers.	MAR 97	3 OCT 97
II.H	CONFIGURATION MANAGEMENT (CM)		
II.H.1 A67286	Establish a Configuration Management Program Team (CMPT) to oversee and direct installation of configuration management for the Y-12 Plant.	MAR 96	26 APR 96
II.H.2 A67287	Develop a general schedule for the activities contained within the CM program Plan, Y/ES-110.	APR 96	24 APR 96
II.H.3 A67288	Develop guidance for performing ongoing assessments of CM processes.	JUL 96	16 JUL 96
II.I	DOCUMENT CONTROL		

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REFERENCE NUMBER	CORRECTIVE ACTION PLAN (CAP) ITEM	PLANNED CLOSURE	ACTUAL DATE
II.I.2.a A67289	Revise procedure Y10-102 to incorporate Lessons Learned from experience during resumption of Nuclear Operations, including concerns identified during the 94-4 Task 4 Assessment. (# Complete Jul 96. Y10-102 was revised in early CY 1996, however additional needed revisions were identified and completed in July.	MAY 96	JUL 96
II.I.3.a A67290	Identify appropriate personnel to receive training on revised procedure Y10-102.	MAR 96	9 JUL 96
II.I.3.b A67291	Implement training on revised procedures Y10-102. (# Y10-102 has been revised again. Request in to change planned closure date to JAN 98). *Due to lack of resources to implement training on this procedure, planned closure date has been revised to April 1998.	*APR 98	
NEW A66708	Establish document control in support of restart requirements in DSO facilities.	JUN 96	APR 96
II.I.4.a A66708	Implement a Document Control process in EUO based on lessons learned from DSO implementation and the requirements of Y10-189.	APR 96	APR 96
II.I.4.c A67294	Implement Y10-189 in : a. remaining Nuclear Operations and EUO support areas b. Balance of Plant areas	a - DEC 96 b - MAR 98	a- DEC 96 b -
III	DEPARTMENT OF ENERGY IMPROVEMENT ARE	AS	
III.A	DOE OVERSIGHT PROGRAM		
III.A.1	Program Development		
III.A.1.a.1	Develop a Management Walk-Through Process and formalize as part of a Y-12 Site Office (YSO) procedure. (See III.A.2.c).	MAR 96	12 FEB 96
III.A.1.a.2	Develop a program for periodic ORO Assist Visit Process on Conduct of Operations at Y-12.	MAY 96	27 MAY 96
III.A.1.a.3	Develop an ORO Management Walk-Through Process for Y-12.	MAY 96	26 JUL 96
III.A.1.b.1	Develop a list of previously used and projected resource needs that ORO or DP-HQ could provide support in obtaining.	FEB 96	17 SEP 96
III.A.1.b.2	Develop a program to provide ongoing support to ORO/YSO.	MAR 96	15 APR 96

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REFERENCE NUMBER	CORRECTIVE ACTION PLAN (CAP) ITEM	PLANNED CLOSURE	ACTUAL DATE
III.A.1.c	Develop long-term staffing plan after Y-12 long-term missions are better defined in light of ongoing resumption planning and Defense Programs budgets.	AUG 96	29 AUG 96
III.A.1.d	Evaluate Facility Representative (FR) responsibilities as they relate to oversight of the Quality Evaluation Special Operation and performance of principal and collateral duties.		18 JAN 96
III.A.1.e	Revise YSO procedures to utilize high level PIs for Conduct of Operations provided by LMES to be forwarded to YSO and ORO AMDP management for review.	NOV 96	2 JAN 97
III.A.1.f	Evaluate the sufficiency of the award fee percentage weight assigned to Conduct of Operations.	JUN 96	8 JUL 96
III.A.2	Program Execution and Implementation		
III.A.2.a.1	Implement revised agenda for weekly Facility Representative meeting and document changes to file.		18 JAN 96
III.A.2.a.2	Perform and document training and awareness sessions on the need for involving YSO staff on issues identified by the FR and encourage open communications with YSO personnel.		18 JAN 96
III.A.2.b	Conduct training on the revised procedure for reviewing Conduct of Operations Performance Indicators.	NOV 96	21 MAY 97
III.A.2.c	Implement a Management Walk-through Process as part of a YSO procedure. (See III.A.1.a.1)	MAR 96	16 APR 96
III.A.2.d.1	Implement a periodic ORO Assist Visit Process on Conduct of Operations at Y-12. (See III.A.1.a.2)	MAY 96	26 JUN 96
III.A.2.d.2	Implement an ORO Management Walk-Through Process for Y-12.	MAY 96	16 SEP 96
III.A.2.e	Initiate actions to improve FR coverage of principle and collateral duties based on results of evaluation per item III.A.1.d.		18 JAN 96
III.A.2.f	Issue a recommendation in writing to the YSO Manager with the results of the evaluation of the sufficiency of award fee percentage weight assigned to Conduct of Operations. (See III.A.1.f)	JUN 96	8 JUL 96
III.A.3	Program Assessment		
III.A.3.a	Conduct a YSO self-assessment on the effectiveness of YSO oversight of conduct of operations.	AUG 96	17 OCT 96

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REFERENCE NUMBER	CORRECTIVE ACTION PLAN (CAP) ITEM	PLANNED CLOSURE	ACTUAL DATE
III.A.3.b	Conduct follow-up assessment on the effectiveness of corrective actions for findings and concerns identified by the Task 4 review.	AUG 97	7 AUG 97
III.B	DOE CORRECTIVE ACTION PROGRAM		
III.B.1	Program Development		
III.B.1.a	Revise Monthly Report process to include: 1) Provide LMES an advance draft copy of the Monthly Assessment Report prior to the monthly meeting. 2) Clarify YSO guidance to LMES on transmitting corrective action plans to the YSO.		22 JAN 96
III.B.1.b	Revise YSO procedures to enhance the Deficiency Tracking System used within the YSO.	SEP 96	24 JUN 96
III.B.1.c	Revise the YSO issues management methods; revise procedures where needed to enhance the Issues Management System.	NOV 96	5 FEB 97
III.B.1.d	Revise YSO procedures to provide guidance on the requirements for evaluating for lessons learned and generic implications for findings against the YSO.	MAR 96	24 JUN 96
III.B.1.e	Develop and promulgate guidance for the approval of LMES corrective action plans to preclude future CAP approvals which contain the development of an action plan as the only action.	MAR 96	24 JUN 96
III.B.1.f	Review previously closed DOE findings from RSS resumption oversight activities in accordance with revised YSO procedure guidance to ensure that generic implications, lessons learned, etc. were properly addressed.	MAY 96	12 JUL 96
III.B.2	Program Execution and Implementation		
III.B.2.a	Initiate additional corrective actions as determined necessary from the review of previously closed DOE findings from RSS resumption oversight activities. (See III.B.1.f)	MAY 96	23 SEP 96
III.B.2.b	Perform CAP development and Verification/Validation on DOE RSS RA findings against ORO in accordance with YSO procedures.	MAR 96	28 MAR 96
III.B.2.c	Implement actions of Item 14.1.1 to provide LMES an advance draft copy of the Monthly Assessment Report prior to the monthly meeting and to clarity YSO guidance to LMES on transmitting CAPs to the YSO. (See III.B.1.a)		22 JAN 96

4.3: CORRECTIVE ACTION PLAN FOR TASK 4 ASSESSMENTS OF CONDUCT OF OPERATIONS AT Y-12 (Revision 1, YSO letter to D. Rhoades dated October 28, 1996)

REFERENCE NUMBER	CORRECTIVE ACTION PLAN (CAP) ITEM	PLANNED CLOSURE	ACTUAL DATE
III.B.2.d	Implement revisions to YSO procedures which enhance the Deficiency Tracking System used within the YSO. (See III.B.1.b)	NOV 96	5 FEB 97
III.B.2.e	Implement the changes to existing YSO issues management methods and procedures for the Issues Management System.	NOV 96	5 FEB 97
III.B.2.f	Implement revised YSO procedures for evaluating lessons learned and generic implications for findings against the YSO. (III.B.1.d)	MAR 96	22 JUL 96
III.B.2.g	Implement guidance for the approval of LMES CAPs to preclude future CAP approvals which contain the development of an action plan as the only action. (See III.B.1.e)	MAR 96	22 JUL 96
III.C	OCCURRENCE NOTIFICATION / REPORTING		
III.C.1	Program Development		
III.C.1.a.1	Develop LMES procedure for compliance to DOE Order 232.1.	JAN 96	4 MAR 96
III.C.1.a.2	Approve the new LMES procedure for compliance to DOE Order 232.1.	OCT 96	25 OCT 96
III.C.1.a.3	Provide DP and EH a courtesy copy of the LMES procedure for compliance to DOE Order 232.1	MAR 96	16 APR 96
III.C.1.a.4	Provide overview to FR and YSO personnel on DOE Order 232.1.	FEB 96	20 MAR 96
III.C.2	Program Execution and Implementation		
III.C.2.a.1	Install ORPS work stations for all YSO FRs.		20 DEC 95
III.C.2.a.2	Train FRs on ORPS usage.	JAN 96	9 FEB 96
III.C.2.a.3	Provide ORPS passwords to FRs from Operational Event Information Systems (OEIS).		7 NOV 95

TABLE IX

5.6: CORRECTIVE ACTION PLAN FOR TECHNICAL COMPETENCE REVIEW. (LMES letter to R.J. Spence dated July 19, 1996.)

REFERENCE NUMBER	CORRECTIVE ACTION PLAN (CAP) ITEM	PLANNED CLOSURE	ACTUAL DATE	
TAT 1 (Para 4.1)	Training programs should be revised from a procedure based system to a system which emphasizes system knowledge, interactions, and relationship to safety related process. (General)			
ACTION 1-1	The requirement to incorporate and emphasize system interactions and relationships to safety-related processes will be included in the revised Y-12 training directives. (A70015)	DEC 96	31 DEC 96	
ACTION 1-2	Training programs will then be revised, as required, as each Y-12 organization completes its biennial review and revision of their training modules. (A70002, A70010, A70012, A70013, A70204)	DEC 98		
ACTION 1-3	The evaluation of Y-12 organizations implementation of this requirement, as stated in the revised Y-12 training directive, willbe emphasized in the ongoing Y-12 Management Self-Assessment (MSA) program. MSA reports will document progress on emphasizing knowledge, interactions, and relationships to safety related processes in required training documents. (A70016, A70018, A70021, A70024, A70026, A70028, A70248)	JUN 97 (Starting 10 APR 97)	JUL 97	
ACTION 1-4	Commence ongoing training for Nuclear Ops, Support and BOP Line Managers on principles of Conduct of Operations and implementation in their facilities. (A67034[I.C.2.c], A67044[I.C.5.a.4], A67035[I.C.2.d])	JUN 97 (Starting APR 97)	JUL 97	
ACTION 1-5	Conduct operator CONOPS implementation training for support organizations and Balance of Plant (BOP). (A67038[I.C.4.c], A67040[I.C.4.d])	JUN 97 (Starting MAY 97)	JUL 97	
TAT 2 (Para 4.2)	Management should quickly revise the training directives to more effectively provide sufficient guidance to implement the training programs at Y-12. This will allow standardization of the training programs at the Y-12 Plant. The development of the training directives should have line management involvement and be approved by Senior Line Management. (General)			
ACTION 2-1	Revise Y-12 training directives to include clear and concise guidance to implement a standard and fully mature T&Q program which incorporates lessons learned from more successful/creditable programs. (A70029)	DEC 96	31 DEC 96	
ACTION 2-2	Assess organization T&Q programs against revised training directive standards. (A70050)	JUN 97 (Starting 10 APR 97)	JUN 97	

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REFERENCE NUMBER	CORRECTIVE ACTION PLAN (CAP) ITEM	PLANNED CLOSURE	ACTUAL DATE
ACTION 2-3	Keep line management, senior management informed on the status of organizations' compliance with training and qualification status reports. (A70051)	AUG 96	31 AUG 96
ACTION 2-4	Develop a matrix to show how the revised training directive complies with the 5480.20A Standards/Requirements Identification Document (S/RIDS). (A70103)	DEC 96	31 DEC 96
ACTION 2-5	The revised Y-12 training directives will receive line management concurrence and Senior Management approval. (A70108)	DEC 96	31 DEC 96
TAT 3 (Para 4.3)	Include facility and process specific training at the appropriate level for nuclear facilities. (General)	or those personnel wh	no work in Y-12
ACTION 3-1	Y-12 Plant training management complete benchmarking of resumed Y-12 and other DOE facilities for effective facility and process specific training approaches. Report will document benchmarking completion. (A70109) # Schedule slipped when SRS requested delay in benchmarking trip.	FEB 97#	FEB 97
ACTION 3-2	Incorporate lessons learned from both the EUO approach and benchmarking other resumed facilities into the revised Y-12 training directives. (A70110)	DEC 96	31 DEC 96
ACTION 3-3	Revise training programs, as required, as each Y-12 organization completes its biennial review and revision of its training modules to include facility and process specific training, at the appropriate level, for those personnel who work in nuclear facilities. Training MSAs will document progress and closure. (A70002, A70004, A70005, A70007, A70008, A70009, A70010, A70012, A70013, A70204, A70504)	DEC 98	
TAT 4 (Para 4.4)	determination of qualified/certified positions results (Ceneral)		
ACTION 4-1	Establish a special working group under the Y-12 Training Working Group to review and revise the current Classification Job Position Checklist and associated guidance.	JUL 96	19 JUL 96

TABLE IX

5.6: CORRECTIVE ACTION PLAN FOR TECHNICAL COMPETENCE REVIEW. (LMES letter to R.J. Spence dated July 19, 1996.)

REFERENCE NUMBER	CORRECTIVE ACTION PLAN (CAP) ITEM	PLANNED CLOSURE	ACTUAL DATE
ACTION 4-2	Organizational managers review their TIM positions against the revised guidance, recommend any necessary revisions to their positions currently in the Y-12 TIM. (A70118, A70119, A70125, A70126, A70127, A70128, A70129, A70130, A70131, A70132, A70206)	AUG 96	31 AUG 96
ACTION 4-3	Complete actions 4-1 and 4-2 prior to submission Revision 6 to the Y-12 TIM to DOE for approval. (A70270)	FEB 97	20 DEC 96
TAT 5 (Para 4.5)	Establish a system to ensure senior managers are informed accountable for achieving TIM IPP milestones. (General	-	gers are held
ACTION 5-1	Y-12 Plant Training Manager will provide a monthly status report/brief of missed/overdue TIM commitments for each organization to organizational managers and Senior Management.	AUG 96	AUG 96
ACTION 5-2	Provide this status data to YSO quarterly.	AUG 96	AUG 96
ACTION 5-3	Organizational managers with missed/overdue TIM commitments must present recovery plans to Senior Management within 10 working days.	SEP 96	SEP 96
TAT 6 (Para 4.6)	Training self-assessments should include more performation level of knowledge. (General)	nce based evalua	tions and focus
ACTION 6-1	Include the requirement to incorporate and emphasize performance based assessments in the revised Y-12 training directives. (A70137)	DEC 96	31 DEC 96
ACTION 6-2	Protective Services Organization will provide training to Y-12 organizations to assist in implementing more performance based assessments of the training and qualification programs. (A70138)	JAN 97	15 NOV 96
ACTION 6-3	Include more performance based evaluations in training self-assessments beginning in the second quarter of 1997. (A70139, A70148, A70275)	APR 97	JAN 97
ACTION 6-4	Train nuclear operations and support line management on performance based assessment techniques. (A67094[I.E.3.d])	JUN 97 (Starting APR 97)	JUL 97
TAT 7 (Para 4.7) Establish effective continuing training and proficiency programs. (General)			

TABLE IX

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REFERENCE NUMBER	CORRECTIVE ACTION PLAN (CAP) ITEM	PLANNED CLOSURE	ACTUAL DATE
ACTION 7-1	Benchmark those Y-12 continuing training and proficiency programs which are recognized as the best as part of the process to revise the Y-12 training directives. (A70149)	DEC 96	31 DEC 96
ACTION 7-2	Organizations with training and qualification program requirements will initiate the self-assessment of continuing training programs using revised guidance. (A70150, A70159, A70276)	APR 97	APR 97
TAT 8 (Para 4.8)			
ACTION 8-1	Complete the EUO Training and Qualification Program Descriptions that include knowledge and skill requirements for operators and define the qualification/certification process for each position.	AUG 96	AUG 96
ACTION 8-2	Submit the EUO Training and Qualification Program Plan for Restart to YSO for approval.	AUG 96	AUG 96
ACTION 8-3	Instructional staff qualification requirements will be established on a case-by-case basis by the EUO training organization and specific requirements will be established as required by the Conduct of Training Manual. (A70180)	NOV 96	15 NOV 96
TAT 9 (Para 4.9)	Evaluate the current number of operator positions to det fissionable materials in significant quantities to require continuous continuous description.		
ACTION 9-1	Complete the EUO Training and Qualification Program Descriptions that include knowledge and skill requirements for operators and define the qualification/certification process for each position.	AUG 96	AUG 96
ACTION 9-2	EUO establish a "Position Certification Review Panel" by October 1, 1996 to make a determination as to whether or not a position requires certification. (A70163)	OCT 96	1 OCT 96
TAT 10 (Para 4.10)	Develop a method to improve retention of radiological controls knowledge. (EUO)		

TABLE IX

5.6: CORRECTIVE ACTION PLAN FOR TECHNICAL COMPETENCE REVIEW. (LMES letter to R.J. Spence dated July 19, 1996.)

REFERENCE NUMBER	CORRECTIVE ACTION PLAN (CAP) ITEM	PLANNED CLOSURE	ACTUAL DATE
ACTION 10-1	Review, to include benchmarking, other DOE facilities, radiological worker core training and testing. (A70164)	JUN 97	OCT 96
ACTION 10-2	Review current radiological controls training and testing methods/approach for adequacy in promoting trainee retention of fundamental knowledge requirements. (A70165)	JUN 97	NOV 96
ACTION 10-3	Make recommendation to DOE on necessary revisions to initial RADCON training courses and continuing RADCON training program. (A70166)	MAR 97	APR 97
ACTION 10-4	Request resources to implement the revised radiological controls training, if revisions to the DOE course are approved; and include assessment of retention in Management Self Assessments. (TBD)	OCT 97	OCT 97
TAT 11 (Para 4.11)	Evaluate staffing levels against requirements to determine is sufficient competent resources are currently available. In addition, sufficient time must be made available for operators to participate in required training. (EUO)		
ACTION 11-1	Establish minimum staffing requirements to support various phases of the EUO Process Based Restart	AUG 96	AUG 96
ACTION 11-2	Designate individuals/staff positions for each qualification area in the EUO Training and Qualification Project Schedule which reflects when training and examinations will be conducted, thereby ensuring sufficient time for training is made available.	AUG 96	AUG 96
TAT 12 (Para 4.12)	Training requirements for supervisory positions should be should be revised accordingly. (FMO)	e established and	l the TIM
ACTION 12-1	FMO establish supervisory position training requirements and submit a TIM change request.	JUL 96	JUL 96
TAT 13 (Para 4.13)	Complete the development of training materials and implement training to meet the requirements of maintenance organization positions. (FMO)		
ACTION 13-1	FMO complete task analysis for Train, Overtrain, or Pre-Train tasks and will use a graded approach with EUO supporting positions/tasks being completed first. (A70175)	NOV 96	30 NOV 96
ACTION 13-2	FMO develop Performance Documentation Checklists (PDC) for each task. (A70176)	MAY 97	MAY 97

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REFERENCE NUMBER	CORRECTIVE ACTION PLAN (CAP) ITEM	PLANNED CLOSURE	ACTUAL DATE
ACTION 13-3	Training and qualification will be implemented through utilization of formal On-Job-Training (OJT) with EUO maintenance related activities being the first to train and qualify. (A70179)	DEC 98	
TAT 14 (Para 4.14)	Include basic Industrial Hygiene and Industrial Safety tra programs for IH and IS personnel, especially at the techr		
ACTION 14-1	HSEA assess IH and IS training and qualification programs to determine the level of knowledge and/or deficiencies in selected fundamentals training. (A70196) # IH & IS positions no longer in Y-12 TIM.	MAR 97	CANCELED#
ACTION 14-2	HSEA incorporate selected fundamentals training into the initial and continuing training programs for IH and IS personnel. (A70197) # IH & IS positions no longer in Y-12 TIM.	FEB 97	CANCELED#
TAT 15 (Para 4.15)	Provide the capability for training managers to access and sort the ESAMS data base to facilitate the management of training issues which have been entered into ESAMS. (EUO)		
ACTION 15-1	Provide training for managers on the existing capability to sort ESAMS data base.	SEP 96	SEP 96
TAT 16 (Para 4.16)	The Y-12 Plant Training Manager should regularly provisues to CCE Senior Management. CCE Senior Management (CCE)		
ACTION 16-1	Y-12 Plant Training Manager provide CCE a detailed overview of the major Y-12 training issues, requirements, etc. on a monthly basis.	JUL 96	JUL 96
ACTION 16-2	Revise the Y-12 Training Working Group Charter to include CCE membership and to have the group function as a training issues management forum.	SEP 96	SEP 96
ACTION 16-3	CCE Senior Management initiate processes and systems to improve service to the Y-12 customer including: track to resolution customer requests; regularly review ESAMS database for training issues; CCE Director meet with Y-12 VP every six weeks to review customer satisfaction levels, CCE performance and discuss issues pertinent to service. (A70209, A70210, A70211)	SEP 96	NOV 96

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REFERENCE NUMBER	CORRECTIVE ACTION PLAN (CAP) ITEM	PLANNED CLOSURE	ACTUAL DATE
ACTION 16-4	CCE Director meet with Y-12 managers every quarter to discuss customer satisfaction issues. (A70277)	DEC 96	DEC 96
ACTION 16-5	Conduct a customer satisfaction survey with a random sample of directors and Y-12 division training officers at the beginning of every calendar year. (A70213)	MAR 97	MAR 97
TAT 17 (Para 4.17)	Develop and conduct training for Plant Shift Superintendents (PSS) and Fire Department personnel on the attributes necessary to safely operate OSR related systems. (SSO/EM/ESPS)		
ACTION 17-1	Complete development and conduct training on the attributes necessary to operate OSR related systems for: a. PSS personnel b. Fire Department personnel (A70218)	a - AUG 96 b - DEC 96	a - AUG 96 b- 1 JUL 97
TAT 18 (Para 4.18)	Complete the provisional qualification process for DUO personnel by obtaining the Qualification Verification Official signature in the qualification records. (DUO)		
ACTION 18-1	DUO obtain the Qualification Verification Official signature in the qualification records.	JUL 96	19 JUL 96

TABLE X

REFERENCE NUMBER	CORRECTIVE ACTION PLAN (CAP) ITEM	PLANNED CLOSURE	ACTUAL DATE
CS-6/Y-12/003 132786	LMES is making slow progress in correcting the fundam safety Program.	ental problems in	n the Criticality
A72096	Develop a listing of assessment areas for the NCS Program.	APR 97	20 AUG 97
A72015	Review and concur with the listing of assessment areas for the NCS Program. Comments from selected Task 3 assessors should be solicited and considered during the review.	MAY 97	31 MAR 97
A72105	Review the scope of external assessments/audits performed since the issue of DNFSB Recommnedation 94-4 and report assessment areas that have not been examined.	JUL 97	20 AUG 97
A72108	Perform or schedule assessment of areas identified as not previously addressed. *Past assessments coupled with EUO restart ORR sufficiently cover all areas requiring assessment. Additionally the driver for this action, ES-101, is being canceled therefore eliminating the need for this review. Documentation requesting cancellation is being prepared.	OCT 97	*
A72111	Review open issues/actions directly related to the NCS Program as documented in ESAMS and report to the NCSAC any recommenations for: additional root cause evaluations; additional short term analysis.	MAY 97	20 AUG 97
A72114	Perform root cause evaluations and/or modify action plans as directed by the NCSAC based on the issues/actions report.	OCT 97	15 MAY 97
A72117	Review plantwide criticality safety status, improvement efforts, and lessons learned to identify further plans for improvement for FY1998.	JUN 97	15 MAY 97
A72120	Reassess and revise the NCS Long Term Improvement Plan and Implementation Plan based upon plantwide review.	SEP 97	15 MAY 97
CS-6/Y-12/002 132785	LMES has not established corrective actions to fix either the specific problems or the root cause for many of the issues identified in their evaluations.		
A72096	Develop a listing of assessment areas for the NCS Program.	APR 97	20 AUG 97

TABLE X

REFERENCE NUMBER	CORRECTIVE ACTION PLAN (CAP) ITEM	PLANNED CLOSURE	ACTUAL DATE
A72015	Review and concur with the listing of assessment areas for the NCS Program. Comments from selected Task 3 assessors should be solicited and considered during the review.	MAY 97	31 MAR 97
A72105	Review the scope of external assessments/audits performed since the issue of DNFSB Recommnedation 94-4 and report assessment areas that have not been examined.	JUL 97	20 AUG 97
A72108	Perform or schedule assessment of areas identified as not previously addressed. *Past assessments coupled with EUO restart ORR sufficiently cover all areas requiring assessment. Additionally the driver for this action, ES-101, is being canceled therefore eliminating the need for this review. Documentation requesting cancellation is being prepared.	OCT 97	*
A72111	Review open issues/actions directly related to the NCS Program as documented in ESAMS and report to the NCSAC any recommenations for: additional root cause evaluations; additional short term analysis.	MAY 97	20 AUG 97
A72114	Perform root cause evaluations and/or modify action plans as directed by the NCSAC based on the issues/actions report.	OCT 97	15 MAY 97
A72117	Review plantwide criticality safety status, improvement efforts, and lessons learned to identify further plans for improvement for FY1998.	JUN 97	15 MAY 97
A72120	Reassess and revise the NCS Long Term Improvement Plan and Implementation Plan based upon plantwide review.	SEP 97	15 MAY 97
CS-6/Y-12/001 132784	LMES has not completed evaluations of the effectiveness of all aspects of the Y-12 Criticality Safety Program.		
A72096	Develop a listing of assessment areas for the NCS Program, using the site S/RIDS.	APR 97	20 AUG 97
A72015	Review and concur with the listing of assessment areas for the NCS Program. Comments from selected Task 3 assessors should be solicited and considered during the review.	MAY 97	31 MAR 97

TABLE X

REFERENCE NUMBER	CORRECTIVE ACTION PLAN (CAP) ITEM	PLANNED CLOSURE	ACTUAL DATE
A72105	Review the scope of external assessments/audits performed since the issue of DNFSB Recommnedation 94-4 and report assessment areas that have not been examined.	JUL 97	20 AUG 97
A72108	Perform or schedule assessment of areas identified as not previously addressed. *Past assessments coupled with EUO restart ORR sufficiently cover all areas requiring assessment. Additionally the driver for this action, ES-101, is being canceled therefore eliminating the need for this review. Documentation requesting cancellation is being prepared.	OCT 97	*
A72111	Review open issues/actions directly related to the NCS Program as documented in ESAMS and report to the NCSAC any recommenations for: additional root cause evaluations; additional short term analysis.	MAY 97	20 AUG 97
A72114	Perform root cause evaluations and/or modify action plans as directed by the NCSAC based on the issues/actions report.	OCT 97	15 MAY 97
A72117	Review plantwide criticality safety status, improvement efforts, and lessons learned to identify further plans for improvement for FY1998.	JUN 97	15 MAY 97
A72120	Reassess and revise the NCS Long Term Improvement Plan and Implementation Plan based upon plantwide review.	SEP 97	15 MAY 97
CS-5/Y-12/ 001/002 132783	Current CSAs impede Operator/Supervisor training and day-to-day operations.	are difficult to ap	oply in normal,
A72200	For each organization with fissile material processes, through the Training Working Group, perform analysis of NCS training needs, considering: 1) basic knowledge needs, 2) basic facility-specific knowledge needs, and 3) job-specific knowledge needs.	MAR 97	MAR 97
A72358	Based on the analysis above, through the Training Working Group, revise and implement training as required.	JUN 97	21 MAY 97
A72359	Reassess the effectiveness of the NCS training program.	FEB 98	

TABLE X

REFERENCE NUMBER	CORRECTIVE ACTION PLAN (CAP) ITEM	PLANNED CLOSURE	ACTUAL DATE
CS-5/Y-12/ 002/001 132782	Some Operators, specifically in EUO, did not demonstrate adequate knowledge of the need to control mass and material types as handled and stored in Y-12 facilities as required by ANSI/ANS 8.20, Section 7.5.1.		
A70002	Training programs will be revised as the Enriched Uranium Operations Organization completes its biennial review and revision of its training modules. Management self-assessments will document progress and completion.	DEC 98	
A70150	Perform self-assessments of continuing training programs using the revised guidance and develop CAPs where necessary to ensure compliance.	APR 97	28 JAN 97
A70204	Training programs will be revised as the Waste Management Organization completes its biennial review and revision of its training modules. Management self-assessments will document progress and completion.	DEC 98	
A70276	Perform self-assessments of continuing training programs using the revised guidance and develop CAPs where necessary to ensure compliance.	APR 97	9 FEB 97
A70012	Training programs will be revised as the Analytical Services Organization completes its biennial review and revision of its training modules. Management self-assessments will document progress and completion.	DEC 98	
A70027	Perform self-assessments of continuing training programs using the revised guidance and develop CAPs where necessary to ensure compliance.	APR 97	8 APR 97
A70013	Training programs will be revised as the Protective Services Organization completes its biennial review and revision of its training modules. Management self-assessments will document progress and completion.	DEC 98	
A70159	Perform self-assessments of continuing training programs using the revised guidance and develop CAPs where necessary to ensure compliance.	APR 97	11 APR 97

TABLE X

REFERENCE NUMBER	CORRECTIVE ACTION PLAN (CAP) ITEM	PLANNED CLOSURE	ACTUAL DATE
A70010	Training programs will be revised as the Site Shift Operations and Emergency Preparedness Organization completes its biennial review and revision of its training modules. Management self-assessments will document progress and completion.	DEC 98	
A70026	Perform self-assessments of continuing training programs using the revised guidance and develop CAPs where necessary to ensure compliance.	APR 97	6 NOV 96
A70018	Training programs will be revised as the Disassembly and Storage Organization completes its biennial review and revision of its training modules. Management self-assessments will document progress and completion.	DEC 98	
A70004	Perform self-assessments of continuing training programs using the revised guidance and develop CAPs where necessary to ensure compliance.	APR 97	28 MAY 97
CS-2/9720-5/ 001/002 132750	Plant personnel conduct criticality evacuation drills with	out procedures.	
A70963	Issue an Energy Systems Immediate Action Directive (IAD) for the conduct of emergency drills, including criticality evacuation drills.	SEP 97	9 OCT 97
A70961	Develop an issue an Energy Systems Emergency Drill Plan for CY 1997.	JAN 97	13 JAN 97
A70967	Complete implementation of the CY 1997 Energy Systems Emergency Drill Plan for Criticality Evacuation Drills.	JAN 98	*12 DEC 97
CS-2/9720-5/ 001/001 132738	Y-12 emergency procedures do not clearly designate evacuation routes; some facilities do not show the routes, and those that do, do not avoid areas of higher risk.		
A70962	Issue an Energy Systems IAD to implement a facility emergency program.	MAR 97	25 AUG 97
A70964	Develop a prioritized schedule for implementing the facility emergency program IAD.	MAY 97	29 APR 97

TABLE X

REFERENCE	CORRECTIVE ACTION PLAN (CAP) ITEM	PLANNED	ACTUAL
NUMBER		CLOSURE	DATE
A70966	Develop an Energy Systems training module to ensure facility emergency wardens (FEW) are trained to implement the Facility Emergency Procedures (FEPs).	DEC 97	*30 OCT 97
A70965	Complete the development and issuance of Facility-specific Emergency Procedures (FEPs), according to the schedule in A70964, that follow a standard procedure format/content, including the designation of facility evacuation routes.	MAY 98	
A70968	Initiate the training program for facility emergency wardens by presenting the training module developed for A70966.	JAN 98	*30 OCT 97
C-4/9212/ 001 132781	Mass limits are not posted in Building 9212 in areas of continuing operations.		
A72361	Review and assure that documents needed by operating personnel are accessible to the operators.	MAR 97	1 MAR 97
A72090	Perform an assessment of the effectiveness of Task 2 Finding #11 corrective actions and develop revised posting requirements to assure compliance with ANSI/ANS-8.1-1983, Section 4.1.4 as necessary.	JUN 97	15 MAY 97
A72093	Revise Y-12 Plant NCS procedures to incorporate revised posting requirements as needed from Action A72090.	SEP 97	15 MAY 97
A72094	Train NCSD personnel qualified to perform external monitoring on revised posting requirements.	JUL 97	15 MAY 97
CS-2/Y-12/ 004/004 132752	Fixed nuclear accident dosimetry is not provided in locations with portable CAAS units.		
A72168	Walk down areas covered by CAAS units to ensure fixed nuclear accident dosimetry (FNADs) is in place as required by 10 CFR 835.1304. Place FNADs in appropriate locations.	DEC 96	4 JAN 97
CS-2/Y-12/ 004/006 132753	The Y-12 Plant CAAS drawing and the CAAS analysis document (SAD-21) do not reflect the location of portable CAAS units.		

TABLE X

REFERENCE NUMBER	CORRECTIVE ACTION PLAN (CAP) ITEM	PLANNED CLOSURE	ACTUAL DATE
A72181	Portable CAAS units which are deployed on a temporary basis will be managed under procedure Y10-153, "Temporary Modifications," and/or the Nuclear Operations Conduct of Operations Manual, Chapter VIII. #Additional time is required to remove portables from waste management facilities. Evaluation of temporary modification procedure reveals that the portables do not meet rquirements to be included as temporary modifications.	#DEC 97	*22 DEC 97
CS-2/9720-5/ 002/003 132751	The CAAS Surveillance Procedure was not followed as	written on Octob	per 2, 1996.
A72148	Review (Revise) the CAAS Procedure for Building 9720-5 to allow making announcements on both the Emergency Notification System and the Public Address System.	NOV 96	2 JAN 97
A72149	Review training records for all Plant Shift Superintendent personnel associated with conduct of CAAS testing. Review to ensure all personnel have been trained in Chapter 16 of the Nuclear Conduct of Operations Manual, Module #14544.	JAN 97	3 JAN 97
CS-3/Y-12/ 002/003 132756	The review of current CSAs, proposed ICSE/CSEs, and documents indicates the issue of double contingency relaadequately addressed.		
A72363	Prepare and issue a position paper describing the status of analysis of seismic issues relating to nuclear criticality safety.	MAR 97	14 AUG 97
A72132	Perform an assessment of Y-12 Plant practices governing the relationships between the NCSD double contingency analysis and natural phenomena events related in authorization basis documents.	OCT 97	*24 OCT 97
A72275	Develop methodologies to address weaknesses revealed by Action A72132. *Document currently in review process. Expected completion date is 2/1/98.	DEC 97	*
A72133	Revise Y-12 Plant procedures as necessary to ensure natural phenomena related in Authorization Basis List documents are addressed in NCSD criticality safety evaluations based upon assessment recommendations.	APR 98	

TABLE X

REFERENCE NUMBER	CORRECTIVE ACTION PLAN (CAP) ITEM	PLANNED CLOSURE	ACTUAL DATE
A72273	Train NCS Engineers on the revised procedures and implementation methodology.	MAY 98	
A72274	Implement the revised procedure.	JUN 98	
CS-3/Y-12/ 002/002 132755	The lack of a comprehensive authorization basis on which Question (USQ) screening and Unreviewed Safety Question the validity of the process.	-	-
A72285	Verify and update the CAP for 94-4, Task 2, Assessment Finding #9. (This concern is addressed by that CAP.)	JUN 97	7 AUG 97
A72360	Reassess effectiveness following completion of the rescheduled actions of the CAP for 94-4 Task 2, Assessment Finding #9.	DEC 98	
CS-3/Y-12/ 001/005 132758			
A72088	Revise procedures governing the preparation of NCS evaluations to include a requirement that interaction SHALL be addressed in the NCS evaluation.	MAR 97	17 APR 97
A72089	Train NCSD personnel qualified to perform NCS evaluations on the methodology to address interaction in NCS evaluations.	APR 97	24 JUN 97
CS-3/Y-12/ 001/004 132757	There is only one validated cross section set/computer configuration in the Engineers to perform calculations.	ode available to l	NCSD
A72073	Validate the Monte Carlo N-Particle Transport Code on the NCSD's HP9000 Workstation for use in NCS computations.	DEC 97	9 OCT 97
CS-1/Y-12/ 004 132735	Little interaction exists between the criticality safety engineers and the safety analysts to ensure that CSEs and safety analysis documents address criticality accident scenarios consistently and comprehensively in CSEs and safety analysis documents. The NCSD does not document its review of safety documents, such as BIOs, or formally approve them.		
A72279	Perform an assessment of LMES and Y-12 Plant practices governing the relationships between the NCSD and Facility Safety Organization. Include need for NCSD concurrence of ABL documents involving fissile operations.	APR 97	17 APR 97

TABLE X

REFERENCE NUMBER	CORRECTIVE ACTION PLAN (CAP) ITEM	PLANNED CLOSURE	ACTUAL DATE
A72280	Revise Y-12 Plant procedures as necessary to strengthen the required interaction between NCSD and FSE based upon assessment recommendations of Actions A72279.	JUN 97	15 MAY 97
A72134	Train Facility Safety, NCSD, and site safety engineers on the importance of interaction among disciplines.	JUL 97	15 MAY 97
A72135	Conduct a reassessment to evaluate effectiveness of program modifications.	SEP 97	15 MAY 97
CS-1/Y-12/ 005 132736	NCSD staff time is devoted to many activities that do no staff expertise and that should be carried out by other or		efficient use of
A72356	During the EUO process-based restart, qualify Shift Technical Advisors (STAs) in NCS deficiency oversight in accordance with the EUO STA qualification standard.	NOV 97	13 JUN 97
A72057	Document differences between the NCS staff roles and responsibilities at the Y-12 Plant and those of other selected DOE facilities.	JUN 97	15 MAY 97
A72059	Revise Y-12 Plant NCS procedures as necessary to incorporate modified roles and responsibilities based on the needs of the Y-12 Plant and differences between the NCS staff roles and responsibilities at Y-12 when compared to other DOE facilities.	SEP 97	15 MAY 97
A72357	Assess the effectiveness of the revised responsibilities.	MAR 98	
CS-1/Y-12 006 132737	NCSD staff have not regularly participated in tabletop and drill exercises to practice the skills necessary to perform their response team and Emergency Operations Center (EOC responsibilities.		
A 72296	Appoint an Energy Systems Emergency Drill and Exercise Planning Committee, including representation from the NCSD.	MAR 97	6 FEB 97
A72298	Demonstrate by attendance records that Emergency Response Organization cadre members participate annually in an emergency management drill and/or exercise.	JAN 98	*13 JAN 98