

DEFENSE NUCLEAR FACILITIES SAFETY BOARD

September 14, 1994

MEMORANDUM FOR: G. W. Cunningham, Technical Director

COPIES: Board Members

FROM: D. Thompson
Senior Technical Specialist

SUBJECT: Supplementary Report on Hanford Emergency Response Exercise Fraser

1. Purpose: This report supplements the June 23, 1994, trip report evaluating the Hanford Emergency Response Exercise Fraser, and documents DNFSB Staff observations concerning the formal Department of Energy (DOE) Evaluation of the same exercise.
2. Summary: Westinghouse Hanford Company's (WHC's) Exercise "Fraser" Final Critique, dated July 26, 1994, was received by the Board on August 15, 1994.

In general, the WHC report adequately reviews the Exercise against the stated objectives, in accordance with evaluation criteria set forth in the Department's Emergency Management Guide dated December 11, 1991. Unfortunately, it appears the authors of the report chose to soft pedal their criticism, apparently seeking to avoid offending anyone. Although the evaluation does note most of the same areas of poor performance identified by the DNFSB Staff - and some other problems as well - in almost every instance, the findings are presented in contexts that would lead the reader to conclude that the exercise was more successful than it actually was.

3. Background: DNFSB Staff evaluators reported the results of their monitoring of Exercise Fraser in a June 23, 1994, memorandum to the Technical Director, including their evaluation of DOE's development, conduct and control of the exercise. DNFSB Staff evaluators also provided their initial assessment of the adequacy of DOE's own evaluation of the exercise, based on the information provided during the post-exercise "hot washes" and discussions with controllers and evaluators following completion of the exercise. At the time the trip report was written, the DNFSB Staff proposed withholding release of its report until DOE documented its review.

Section II B of DOE's Emergency Exercise Evaluation Criteria calls for evaluator findings to be categorized as "Deficiencies", defined as failures to meet the requirements of applicable DOE Orders or failures to meet evaluation criteria leading to inadequate demonstration of the standard; "Weaknesses", defined as degradations of the demonstration called for in the exercise objectives; or "Improvement Items", defined as subjects for which improvements appear to be warranted. Corrective actions for

Deficiencies and Weaknesses must be documented and tracked to closure, whereas Items for Improvement do not require formal tracking and closure documentation.

4. Discussion/Observations: DOE evaluators of Exercise Fraser identified 43 negative findings (No Deficiencies, 15 Weaknesses and 28 Items for Improvement). WHC evaluators identified 15 objectives that either were not observed or were not met. DNFSB Staff members believe that at least some of these 15 failed objectives constitute deficiencies defined in the applicable Evaluation Criteria. It is recognized, however, that the difference between "inadequate demonstration" and "degraded demonstration" may be perceived differently by different evaluators. Inasmuch as both deficiencies and weaknesses must be tracked to completion by DOE, the DNFSB Staff believes that suitable means are available to determine the adequacy of corrective actions.
5. Additional Future Staff Actions: Staff will track and monitor corrective actions for each of the weaknesses identified in the DOE evaluation.