



Department of Energy

Washington, DC 20585

October 19, 2012

MEMORANDUM FOR DISTRIBUTION

FROM:

Joe O'Brien for
JAMES B. O'BRIEN
DIRECTOR
OFFICE OF NUCLEAR SAFETY
OFFICE OF HEALTH, SAFETY AND SECURITY

SUBJECT:

Facility Representative Program
Performance Indicators Quarterly Report, April–June 2012

This memorandum summarizes the Facility Representative (FR) Program Performance Indicators Quarterly Report covering the period from April through June 2012. Data for these indicators were gathered by field elements per Department of Energy (DOE) Technical Standard 1063-2011, *Facility Representatives*, and reported to Headquarters program offices for evaluation and feedback to improve the FR Program.

Highlights from this report include:

FR Staffing/Qualification/Oversight Data

- DOE was staffed at 176 FR Full Time Equivalent (FTE), which is 95 percent of the full staffing level (DOE goal is 100 percent). This staff reflects a decrease of one FR from the last reporting period due to retirement.
- DOE has 79 percent of the FR staff fully qualified (DOE goal is > 80 percent).
- DOE FRs spent 76 percent of their time on oversight activities (DOE goal is > 65 percent).

FR Program Highlights

Individual site program highlights are included in the current FR Quarterly Report.

The full FR Program Performance Indicators Quarterly Report, current FR information, and the current and past quarterly performance indicator reports are available at the FR Web site at <http://www.hss.energy.gov/nuclearsafety/nfsp/facrep>.

If you have any questions or comments on this report, please contact me at (301) 903-1408 or the DOE FR Program Manager, Earl Hughes, at (202) 586-0065.



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Quarterly Report, April – June 2012:**

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Facility Representative Performance Indicators April-June 2012

OFFICE OF ENVIRONMENTAL MANAGEMENT (EM)

<u>Location</u>	<u>Analysis FTE</u>	<u>Approved FTE</u>	<u>Actual Staff</u>	<u>% Staff *</u>	<u>Gains / Losses</u>	<u>% Core Qualified *</u>	<u>% Fully Qualified *</u>	<u>% Oversight Time **</u>
CBFO	3	3	3	100	0	100	100	73
ID (EM) ¹	7	7	8	100	0	100	100	93
OR (EM)	16	16	15	94	0	88	88	75
ORP	14	14	13	93	0	86	78	81
PPPO ²	6	6	6	100	0	83	83	71
RL	17	17	16	94	0	94	82	66
SPRU ³	2	2	2	100	±1	100	0	70
SR	30	30	30	100	0	90	90	83
WVDP	2	2	2	100	0	100	100	76
EM Totals	97	97	95	98	± 1	93	80	76
DOE GOALS	—	—	—	100	—	—	>80	>65

Location Key:

CBFO = Carlsbad Field Office
 ID = Idaho Operations Office
 OR = Oak Ridge Office

ORP = Office of River Protection
 PPPO = Portsmouth/Paducah Project Office
 RL = Richland Operations Office

SPRU = Separations Process Research Unit
 SR = Savannah River Operations Office
 WVDP = West Valley Demonstration Project

* % Staff and % Qualified:

The number on board divided by the Analysis FTE.

** % Oversight Time:

The number of hours spent in oversight activities divided by the number of available work hours in the quarter. Available work hours include normal scheduled work and overtime, but not leave or special assignments greater than one week.

Notes:

- 1 One ID (EM) FR is slated to transfer to ID (NE) upon startup of the Sodium Bearing Waste Treatment Project.
- 2 One PPPO FR is on long-term detail and has not started qualification.
- 3 One person serving as an FR at SPRU completed a one-year detail and returned to regular duties. In EM's reorganization, the EM Consolidated Business Center will assume responsibility for small site FR programs (including SPRU and WVDP) to provide more consistent coverage and qualification support. This shift is planned for completion in the Third Quarter of Calendar 2012.

EM Facility Representative (FR) Highlights:

- ID (EM): FRs provided operational oversight support to the Idaho Cleanup Project (ICP) Integrated Waste Treatment Unit (IWTU) at the Idaho Nuclear Technology and Engineering Center (INTEC) during the ID focused surveillance of IWTU initial heat-up and integrated testing operations following completion of the DOE Operational Readiness Review.
- ID (EM): Advanced Mixed Waste Treatment Project (AMWTP) FRs identified weaknesses in personnel response to Stop Work commands, a lack of command and control during abnormal event response, poorly stowed hoisting and rigging equipment, the inappropriate use of a Categorical Exclusion in a work control document, and inappropriate reading material in a control area.
- ID (EM): Radioactive Waste Management Complex (RWMC) FRs identified inadequate compensatory measures taken during a fire protection system impairment. They also noted issues with forklift truck operations including an unattended forklift with a raised load, and a worker observed working under a raised forklift load.
- ID (EM): An AMWTP FR issued a finding for the repeated failure of contractor management to notify the FR of abnormal facility events.

Facility Representative Performance Indicators April-June 2012

EM Facility Representative (FR) Highlights:

- ID (EM): FRs served as members of a DOE Readiness Assessment (RA) team that evaluated the contractor readiness to resume retrieval operations at the AMWTP Transuranic Storage Area and Retrieval Enclosure (TSA-RE). The DOE RA concluded that the contractor was ready to safely resume retrieval operations. This FR support was then shifted to providing focused operational oversight during the TSA-RE startup and initial retrieval operations.
- OR (EM): An FR led the Management Assessment for the 3026D Contractor Operational Readiness Review. The Management Assessment was comprised of several engineers, scientists, and specialists. The FR verified the adequacy of the contractor corrective actions, and recommended to the DOE Start-Up Approval Authority the commencement of the DOE Operational Readiness Review.
- OR (EM): During a review of work activities, the FR at K-25 observed that workers were removing the latches of several transite panels at the same time. This presented a work place hazard in that the 80-to-100 pound panels were elevated and could fall on a worker. The FR notified the K-25 Facility Manager, the job supervisor, and the safety and health representative. Changes were made to the work activity such that one panel is completely removed and lowered prior to removing fasteners from multiple panels.
- OR (EM): An FR at K-25 observed contractor personnel cleaning out residual foam contained in 55 gallon drums left over from the recent annual foaming operations demonstration. The FR noted that personnel were not wearing adequate personal protective equipment and notified the General Foreman, who discussed the concern with the workers and the site's occupational safety organization. Face shields were obtained for the workers.
- OR (EM): A TRU facility FR observing elevated work identified that contrary to the work package, an anemometer was not used to measure the actual wind speed. It was unclear to personnel whether the lift manufacturer's wind speed limitations recommendations were exceeded, but local news reports of the weather indicated it was possible. The project obtained an anemometer and discussed operability limits.
- OR (EM): An EM FR at ORNL has been working with representatives of Atomic Energy Canada Limited (AECL) to create a DOE-like condition assessment program for use in Canadian Facilities. The FR has visited AECL on several occasions this past quarter to provide recommendations, and help develop an asset management program.
- OR (EM): An FR was instrumental in the campaign to ship Zero Power Physics Reactor plates from Building 3019 to the Device Assembly Facility at the Nevada National Security Site. The FR participated in all project activities from conception to execution for this project. This project was executed with zero accidents and injuries, and a collective dose of less than 250 person-mrem. The FR is also actively engaged in the campaign to transfer Certified Reference Material to the Oak Ridge National Laboratory.
- OR (EM): An FR, in partnership with the contractor at Building 3517, has been working with the retired Facility Manager (FM) and current FM to review the historical accidents in the facility. This action was taken to minimize the hazards of potential future accidents. The 3517 facility is a Hazard Category 2 nuclear facility that is in Surveillance and Maintenance mode; it contains approximately 100,000 curies of nuclear material.
- ORP: FRs observed an improvement in the Waste Treatment and Immobilization Plant (WTP) contractor performing independent national electrical code inspections for permanent plant commodity installation. This improvement is in addition to construction taking a more critical look at code compliant design provided by engineering.
- ORP: FRs observed improvements with the WTP process for medium voltage electrical work. Improvements were observed in work package processing, and applicable field work, and during recovery from a recent construction site power interruption resulting from switchgear water intrusion.

Facility Representative Performance Indicators April-June 2012

EM Facility Representative (FR) Highlights:

- ORP: An FR conducted a broad sweep of portable fire extinguishers in distributed work areas of the WTP due to reductions in staffing of craft workers and associated reductions in work load in these areas. The FR found that the inspection and verification program had degraded. The contractor acknowledged the issue and took corrective actions
- ORP: During a review for closure of an Occurrence Report at WTP, an FR determined that the corrective actions did not address a weakness in a programmatic element related to the problem. Through feedback, the contractor reopened the review and revised the corrective actions.
- ORP: An FR identified an issue with the WTP feedback process during the Integrated Safety Management System (ISMS) Feedback and Improvement surveillance. The feedback section of the Safety Task Analysis Risk Reduction Talk (STARRT) card (pre-job briefing tool) had not been routinely completed by workers. The documentation provided on the reviewed STARRT cards was insufficient to determine how the worker's feedback had been addressed by the supervisor and to determine if any feedback had been provided back to worker(s) from the supervisor. Additionally, feedback provided on STARRT cards had not been utilized to develop Lessons Learned.
- ORP: FRs identified several hoisting and rigging and elevated work issues and communicated them to the operators for correction.
- ORP: A Tank Farms FR found that during the 219-S Tank 102 sampling activity, the step-by-step procedure was not followed as written, and operators performed actions that were not addressed in the procedure. The contractor has a corrective action to improve the procedure use and content issues for this procedure and is evaluating other operating procedures for extent of condition.
- ORP: An FR found that the incorrect waste designation was applied to a 222-S Laboratory waste drain line that was removed and packaged for disposal. The container was located and re-designated from low level waste to mixed waste, and a causal analysis is forthcoming.
- ORP: During a surveillance of the reasons behind a pump failure associated with the C-107 Mobile Arm Retrieval System, the FR identified numerous issues associated with the failure of the AN-106 Supernatant Pump. These issues included inadequate oversight of pump procurement and subcontractor testing, and inadequate justification for increasing the allowed pump amperage above vendor specifications. The contractor is developing a corrective action plan to improve their oversight of subcontractors.
- ORP: While observing work to resolve inadequate hydraulic fluid flow to the AN-106 Supernatant Pump, four fittings were found to be inadequately tightened. Although the hydraulic hoses were physically connected, they were not adequately connected since restoration required that the hoses be connected such that they would function under operational scenarios (i.e., supernate pump operating). The consequences of this include: Inadequate step execution of a work step in the procedure, weakness in Conduct of Operations (ConOps), schedule and resource impacts due to the delayed AN-106 to AP-104 transfer. Corrective actions included briefings to personnel and entry of the discrepant condition into the corrective action management system to prevent recurrence.
- ORP: An FR identified several Conduct of Operations issues in the field while observing waste transfer valve operations. The issues included poor work control leading to conflicting work activities in the field, poor three-way communications, failure to comply with procedures, poor knowledge of methods of waste transfer valve operation, and trip hazards that were not corrected after being pointed out by oversight personnel. Several findings and observations tracked the corrective actions on these issues.
- RL: Two FRs completed Core Qualification

Facility Representative Performance Indicators April-June 2012

EM Facility Representative (FR) Highlights:

- RL: FRs identified significant and longstanding issues with equipment and facilities configuration and housekeeping associated with facilities being placed in layup after closure of ARRA funding.
- RL: An FR Identified work control issues (job planning, event response, extent of condition analysis, resumption of work) associated with glove box removal activities at PFP.
- RL: AN FR provided key operational oversight of two contractor Readiness Assessment activities for Found Fuel and Knock Out Pot retrieval at three associated facilities (K Basins, Cold Drying Vacuum Facility, Container Storage Building)
- RL: An FR identified numerous issues with a contractor Fall Protection Program which led to a reactive surveillance and numerous identified findings/observations.
- RL: An FR identified a lack of detailed understanding of biological processes in the Fluidized bed Reactor (FBR) at the 200 West Pump and Treat facility, which led to significant upset conditions and an inability of the operators to proactively manage changing conditions.
- RL: An FR identified numerous issues that contractor did not find during their investigation of the overflow of a 25 million gallon water reservoir.
- SR: Office of Laboratory Oversight (OLO) FRs reviewed a revision to the draft Savannah River National Laboratory (SRNL) Justification for Continued and the DOE Safety Evaluation Report for Revision 12 of the SRNL Technical Safety Requirements. Both the draft JCO and the revision to the TSR were written in response to issues with the Fire Protection System identified by OLO FRs and a Headquarters Office of Health, Safety, and Security assessment team.
- SR: OLO FRs supported the DOE-SR Fire Protection Engineer in developing a response to external oversight issues with the A- and K-Area fire protection water supply at the Savannah River Site.
- SR: Salt Waste Processing Facility (SWPF) FRs identified significant issues during the review of SWPF startup procedures that resulted in the development of the Parsons Startup Operations and Test procedure template.
- SR: SWPF FRs coordinated a team of rigging and lifting Subject Matter Experts to review, comment, approve, and provide execution oversight of contractor critical lift plans for the receipt, lift, and setting of the 10 critical large ASME vessels within the SWPF. These tanks weigh up to 105K lbs and required an 1800 ton capacity crane due to the reach and heights involved.
- SR: While observing a hydrostatic test for the F/H Lab Wet-Fire Suppression System New Fire Department Connection, Nuclear Materials Operations Division (NMOD) FRs found numerous issues with the work package.
- SR: The DOE-SR Facility Representative Council developed and gained approval for a Duty Officer Qualification Standard
- WVDP: One FR completed full qualification.

Facility Representative Performance Indicators April-June 2012

OFFICE OF NUCLEAR ENERGY (NE)

<u>Location*</u>	<u>Analysis FTE</u>	<u>Approved FTE</u>	<u>Actual Staff</u>	<u>% Staff *</u>	<u>Gains / Losses</u>	<u>% Core Qualified *</u>	<u>% Fully Qualified *</u>	<u>% Oversight Time **</u>
ID (NE)	9	9	8	89	0	100	89	94
NE Totals	9	9	8	89	0	100	89	94
DOE GOALS	—	—	—	100	—	—	>80	>65

* Location Key:

ID = Idaho Operations Office

* % Staff and % Qualified:

The number on board divided by the Analysis FTE.

** % Oversight Time:

The number of hours spent in oversight activities divided by the number of available work hours in the quarter. Available work hours include normal scheduled work and overtime, but not leave or special assignments greater than one week.

Notes:

One ID (EM) FR is slated to transfer to ID (NE) upon startup of the Sodium Bearing Waste Treatment Project.

NE Facility Representative (FR) Highlights:

- ID (NE): FRs provided operational oversight support to the Idaho Cleanup Project (ICP) Integrated Waste Treatment Unit (IWTU) at the Idaho Nuclear Technology and Engineering Center (INTEC) during the ID focused surveillance of the IWTU initial heat-up and integrated testing operations following completion of the DOE Operational Readiness Review (ORR).
- ID (NE): Advanced Test Reactor Complex FRs noted that weaknesses persist in implementation of operations fundamentals associated with less high-profile operations and maintenance tasks. Examples of these weaknesses included log keeping accuracy, failure to update equipment status, housekeeping, material storage/staging, improper use of the Lockout/Tagout system and the Out of Service tagging system, and informal use of an operator aid to monitor reactor vessel level
- ID (NE): The Materials and Fuels Complex (MFC) FRs provided oversight and real-time feedback to the contractor on corrective actions for the contractor senior-management-imposed Work Stand Down at MFC based on a continued trend of poor operational performance. Recovery efforts initially concentrated on re-establishing personal accountability and competence for all work at MFC.
- ID (NE): MFC FRs provided oversight and real-time feedback to the contractor on the effectiveness of the corrective actions for the DOE Accident Investigation Board's Judgment of Needs for the Zero Power Physics Reactor (ZPPR) Plutonium contamination event, thus ensuring that the corrective actions taken to date will improve the overall facility safety posture.

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NATIONAL NUCLEAR SECURITY ADMINISTRATION (NNSA)

<u>Location</u>	<u>Analysis FTE</u>	<u>Approved FTE</u>	<u>Actual Staff</u>	<u>% Staff *</u>	<u>Gains / Losses</u>	<u>% Core Qualified *</u>	<u>% Fully Qualified *</u>	<u>% Oversight Time **</u>
LASO	15	13	13	87	0	80	67	71
LSO	8	8	8	100	0	75	75	72
NSO	7	7	7	100	0	100	86	75
NPO-PX ¹	10	9	9	90	0	90	90	85
NPO-Y12 ¹	9	9	9	100	0	89	89	76
SRSO	3	3	3	100	0	100	100	77
SSO ²	6	6	5	83	-1	83	83	74
NNSA Totals	58	55	54	93	-1	88	84	76
DOE GOALS	—	—	—	100	—	—	>80	>65

Location Key:

LASO = Los Alamos Site Office
LSO = Livermore Site Office

NSO = Nevada Site Office
NPO = NNSA Production Office, Pantex (PX) and Y-12

SRSO = Savannah River Site Office
SSO = Sandia Site Office

* % Staff and % Qualified:
The number on board divided by the Analysis FTE.

** % Oversight Time:
The number of hours spent in oversight activities divided by the number of available work hours in the quarter. Available work hours include normal scheduled work and overtime, but not leave or special assignments greater than one week.

Notes:

- 1 The Pantex and Y-12 Site Offices were combined into the NNSA Production Office (NPO) with new local management designated NPO-Pantex and NPO-Y-12, reporting local FR PIs as before.
- 2 One SSO FR retired.

NNSA Facility Representative (FR) Highlights:

- LASO: During a Chief, Defense Nuclear Safety (CDNS) Biennial Review of Los Alamos Site Office, all objectives met. This was only the 5th of 21 CDNS reviews where all objectives were met. The review noted “Strong Performance” in the Facility Representative functional area.
- LASO: FRs identified a number of Conduct of Operations deficiencies.
- LASO: An FR identified that two cranes that had “passed” annual inspection still had deficiencies that should have resulted in failure.
- LASO: FRs found issues with radiological postings, radiological training,
- LASO: FRs identified a number of fire safety and fire suppression system deficiencies.
- LSO: One FR completed periodic re-qualification.
- LSO: FRs participated in a readiness assessment and an explosives safety review.
- LSO: An FR identified issues with Tritium Facility instrumentation calibration.
- NPO-PX: FRs led three NNSA Readiness Assessments.
- NPO-Y12: FRs identified a weakness related to operating production equipment without procedures.

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NNSA Facility Representative (FR) Highlights:

- NPO-Y12: FRs identified an issue related to improper storage and labeling of compressed gas cylinders.
- NPO-Y12: FRs conducted over 40 assessments in response to a Defense Nuclear Facilities Safety Board concern with activity level work control.
- NPO-Y12: FRs identified a weakness in Integrated Safety Management implementation; hazards and mitigating controls were not identified, analyzed, and documented properly.
- NSO: FRs started a site-wide comprehensive Conduct of Operations assessment.
- NSO: An FR participated in the Tremor-12 Multi-Facility Venue Full Participation Exercise, and was evaluated as part of the NSO Line Oversight and Contractor Assurance System Affirmation Review
- NSO: Two FRs completed qualification on additional facilities, and one is the Qualifying Official for the other FRs qualifying at the facility.
- NSO: An FR participated in a comprehensive training and qualification assessment of the site contractor.
- SRSO: FRs participated in the Implementation Verification Review (IVR) for the Helium-3 Separations and Bottling Process located in the H-Area New Manufacturing Facility. The IVR results determined that the contractor's Readiness Assessment process was adequate to ensure safe operations.
- SRSO: An FR reviewing round sheets during the facility turnover process identified several procedure non-compliance issues that contributed to less than adequate tracking of LCO conditions for Gloveboxes. The discovery of this issue resulted in the SRSO Manager issuing a formal letter to the contractor requesting immediate actions to mitigate the non-compliances.
- SSO: An FR was recognized by the Chief Health, Safety and Security Officer for an outstanding Lessons Learned presentation at the May, 2012 FR Workshop.
- SSO: An FR provided oversight during loading operations at the Sandia Pulsed Reactor Facility.

Facility Representative Performance Indicators April-June 2012

OFFICE OF SCIENCE (SC)

<u>Location</u>	<u>Analysis FTE</u>	<u>Approved FTE</u>	<u>Actual Staff</u>	<u>% Staff *</u>	<u>Gains / Losses</u>	<u>% Core Qualified *</u>	<u>% Fully Qualified *</u>	<u>% Oversight Time **</u>
AMES ¹	1	1	0.5	50	0	100	0	25
ASO ²	5	4	4	80	0	80	80	54
BHSO	4	4	4	100	0	100	100	76
FSO	2	2	2	100	0	50	50	73
NBL ¹	1	1	0.5	50	0	100	0	35
OR (SC)	5	5	5	100	0	100	100	74
PNSO	3	3	3	100	0	100	100	72
SC Totals	21	20	19	90	0	90	61	58
DOE GOALS	—	—	—	100	—	—	>80	>65

Location Key:

AMES=AMES Site Office BHSO = Brookhaven Site Office NBL = New Brunswick Laboratory PNSO = Pacific Northwest Site Office
 ASO = Argonne Site Office FSO = Fermi Site Office OR = Oak Ridge Office

* % Staff and % Qualified:
 The number on board divided by the Analysis FTE.

** % Oversight Time:
 The number of hours spent in oversight activities divided by the number of available work hours in the quarter. Available work hours include normal scheduled work and overtime, but not leave or special assignments greater than one week.

Notes:

1. The NBL FR covers Ames and NBL. Ames is performing a staffing analysis for its FR needs. The percent fully qualified for NBL was previously reported in error as 100%.
2. ASO performed a staffing analysis which showed 5.4 FTE required. Rounded down to 5.

SC Facility Representative (FR) Highlights:

- ASO: An FR identified several laboratory fume hoods with very high face velocities (>200 fpm). The FR investigated further and identified a weakness in the laboratory's procedure for hood testing in which only an acceptable minimum flow was required. The laboratory is revising the procedure to also include a maximum acceptable face velocity.
- ASO: An FR participating in the Lab-level ALARA review of CARIBU foil changing tasks identified the need for improved air sampler positioning and prompted Argonne to evaluate an unidentified hazard, creating a flammable atmosphere in a glovebag.
- BHSO: An FR participated in the contractor investigation of potential cadmium and lead contamination of workers while working in an air duct.
- BHSO: An FR organized and coordinated the annual BHSO Safety Day. Events included fire extinguisher training, emergency planning reviews, and general safety information for the entire Site Office.
- BHSO: An FR participated in the contractor investigation of a mis-steered beam event during the commissioning of the National Synchrotron Light Source-II (NSLS-II) Linac.
- BHSO: An FR participated in the contractor investigation of a wheeled gas cylinder transport cart holding six gas cylinders which toppled over while being removed off a truck tailgate lift.
- FSO: FRs participated in the DOE Accelerator Safety Guide Coordination and re-write.
- FSO: FRs conducted Construction/Facility Walkthroughs.

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SC Facility Representative (FR) Highlights:

- FSO: FRs Participated in Accelerator Maintenance Shutdown Oversight.
- OR (SC): FRs conducted 73 walkthroughs, with 15 of these walkthroughs conducted jointly with Environment Safety and Health subject matter experts.
- OR (SC): FRs conducted a joint assessment of ORNL's implementation of DOE Order 433.1B, *Maintenance Management Program for DOE Nuclear Facilities* with ORNL Site Office personnel and a subject matter expert from the Oak Ridge Office.
- PNSO: An FR followed the investigation into a laboratory spill of dichloromethane that was initially discovered and reported as an unknown. The researcher involved in the spill did not report the incident, complicating correlation of later questions/reports to the spill.
- PNSO: An FR supported investigation of a DOE Employee Concern involving a potential exposure to two operators during intrusive exhaust system maintenance. Many issues were identified in contractor work planning, work control, and issue follow-up that will be documented in a surveillance report.
- PNSO: FRs supported development of an update to Site Office emergency response procedures.
- PNSO: An FR followed an investigation into a diesel generator periodic load test that resulted in extensive damage to the generator. The work was being performed by an offsite vendor.
- PNSO: An FR identified incorrectly labeled storage of flammable gas bottles, which was immediately corrected by the contractor upon FR notification
- PNSO: FRs followed up on two instances where 90-day waste clocks were expected to be violated due to the need to characterize the waste as an explosive to meet DOT requirements. The contractor had missed the implications of a 2009 DOT interpretation on requirements to characterize even dilute mixtures involving explosives as new explosives. The long-term path forward to prevent future 90-day clock issues for such waste is still being worked out by contractor.
- PNSO: An FR served as a Team Member on a Nuclear Maintenance Management Program Assessment, and an FR reviewed and commented on a contractor procedure for removal of contaminated water from a hot cell transfer duct.
- PNSO: An FR identified an open electrical conduit near an ongoing maintenance activity. The FR notified contractor management, and the work was stopped until the conduit was covered.
- PNSO: An FR supported a Safety System Oversight assessment of the facility Fire Suppression System.