

## MANAGEMENT (MG)

**Objective MG.1** – An adequate startup program has been developed that includes plans for graded operations and testing after startup to simultaneously confirm operability of equipment, the validity of procedures, and the performance and knowledge of the operators. The plans should indicate validation processes for equipment, procedures, and operators after startup or resumption operations, including any required restrictions and additional oversight. (Core Requirement 12)

### Criteria

- The Startup Plan has been developed in accordance with Y15-190, *Readiness Manual*, Volume II, Chapter 1.0, for use during initial operation, and it documents the operability of the equipment, adequacy of the procedures, proficiency of the operators, and any required data collection activities. The equipment and procedures will be identified in the readiness evidence files. Applicable personnel are identified by category in Appendix A of the BWXT POA and by name in the readiness evidence files.

### The Startup Plan identifies the following:

- Equipment/functions requiring testing and test criteria
- What actions are necessary to carefully control the startup (first use controls)
- Criteria for removing controls
- The use of a standalone procedure for the introduction of HF and system passivation
- The limit on the amount of uranium for first use
- The transition from provisional to full qualification/certification
- The first use controls associated with control manipulations
- Use of management oversight personnel during the startup period and at what point oversight is no longer required.

### The Startup Plan has the appropriate approval.

- An oversight team is established and required to be present in an oversight capacity through a prescribed number of evolutions. Their role and responsibilities are well defined and understood by startup personnel.
- The definition for successful operation is included in the plan and includes the evaluation of personnel, equipment, and procedures in the environment with actual material.

### Approach

**Record Review:** Review the Startup Plan and any associated procedures.

**Interviews:** Interview operations and oversight personnel to determine their level of knowledge of their roles and authorities.

**Shift Performance:** Determine whether required oversight is present during observed evolutions, and activities are being conducted in accordance with the Startup Plan.

**Objective MG.2** – Formal agreements between the operating contractor and DOE have been established via the contract or other enforceable mechanism to govern the safe operation of the facility. A systematic review of the facility's conformance to these requirements has been performed. These requirements have been implemented in the facility, or compensatory measures are in place and formally agreed to during the period of implementation. DOE has approved the compensatory measures and the implementation period. (Core Requirement 14)

### Criteria

- The formal agreements between BWXT and the NNSA were reviewed at the initiation of the BWXT contract in November 2000. BWXT procedure Y15-058, *Requirements Compliance Assurance*, requires that assessments be accomplished upon approval of S/RID requirements.

- Any issues identified during assessments directed at OCF operations have been appropriately closed and documented. At a minimum, the following will be reviewed:
  - The original investigation and accident report as a result of the 1992 release
  - Independent Assessment of the HF construction in 1999
  - BWXT corporate assessment
  - Technical Baseline Review
  - Defense Nuclear Facilities Safety Board letters pertaining to the OCF
  - Welding Review
- Any issues or actions identified as not fully implemented are evaluated for impact on OCF operations, and compensatory measures are identified.
- An authorization agreement is in place for the current facility operations. Review the proposed authorization agreement for OCF inclusion.
- Permits or plans required for OCF operation are issued and implemented (e.g., critical lifts, environmental permits, etc.).
- Project-specific welding of OCF components has been appropriately closed and documented.

## Approach

**Record Review:** Review the compliance schedule approvals, exemptions, and compensatory measures associated with the S/RIDs applicable to Building 9212.

**Interviews:** Interview contractor and YSO management concerning systems or processes used to establish and verify compliance with contractual agreements and to identify the compensatory measures currently in force.

**Shift Performance:** Verify that the compensatory measures are enforced during observed evolutions.

**Objective MG.3** – A feedback and improvement process has been established to identify, evaluate, and resolve deficiencies and recommendations made by the oversight groups, official review teams, audit organizations, and the operating contractor (e.g., DOE Policy 450.5). (Core Requirement 15)

## Criteria

- There are no open pre-restart actions for the OCF. The Corrective Action Planning System and Nonconformance Reports have been evaluated for applicability to the OCF, and those items deemed necessary have been appropriately dispositioned and documented.
- BWXT lessons learned have been evaluated for applicability to the OCF and, where applicable, have been implemented.
- Technical Baseline deficiencies identified since 1999 have been resolved. The Technical Baseline includes list of documentation described in the *Technical Baseline Index Summary*, such as Process System Diagrams (PSDs), system design descriptions, etc., which describe the current system configuration.
- The BWXT issue management process and tracking system are fully implemented in Building 9212. Implementation of feedback from oversight groups, review teams, auditing organizations, and internal assessments are an integral part of the issues management system.

Approach Record Review: Review all open issues for Building 9212 for applicability to the OCF.

Interviews: Interview operations and oversight personnel to verify the adequate tracking, correction, and closure of findings from oversight groups, official review teams, audit organizations, and the operating contractor that are relevant to the OCF operations.

**Shift Performance:** None.

**Objective MG.4** – The breadth, depth, and results of the responsible contractor’s readiness review are adequate to verify the readiness of hardware, personnel, and management programs for operations. (Core Requirement 17)

**Criteria**

- BWXT has completed an ORR in accordance with DOE Order 425.1C, *Startup and Restart of Nuclear Facilities*.
- The ORR implementation plan adequately scoped the POA in terms of the depth and breadth.
- Team member knowledge and experience of the contractor ORR team members was sufficient to support their selection to the team.
- The startup recommendation that is provided by the contractor ORR team was consistent with the conclusions that are documented in the ORR final report.

**Approach**

**Record Review:** Review the contractor’s POA, IP, and final report.

**Interviews:** Interview selected contractor ORR team members to assess their knowledge and expertise.

**Shift Performance:** None.