

HSS Independent Activity Report - Rev. 0**Report Number:** HIAR NNSS-2011-11-28**Site:** Nevada National Security Site**Subject:** Office of Enforcement and Oversight's Office of Safety and Emergency Management Evaluations Activity Report for Operational Awareness Oversight of the National Nuclear Security Site**Dates of Activity :** 11/28/2011**Report Preparer:** William Macon**Activity Description/Purpose:**

The purpose of this Office of Health, Safety and Security (HSS) activity was to independently review the National Nuclear Security Administration/Nevada Site Office (NNSA/NSO) report ASM-AMSO-7.1.2011-360061, *Conduct of Operations Management Assessment Final Report*, dated October 2011, for operational awareness oversight. The subject report documents NSO's formal management assessment of the site contractor's Conduct of Operations (COO) safety management program (SMP) in accordance with Department of Energy (DOE) Order 5480.19, Change 2, *Conduct of Operations Requirements for DOE Facilities*.

The Chief of Defense Nuclear Safety (CDNS) conducted the third NNSA biennial review of NSO during May 9-18, 2011, to provide feedback to NNSA management on the safety of nuclear operations. As a result of the review, NSO received a grade of "Needs Improvement" in the COO functional area because of a lack of evidence that NSO had performed assessments of the site contractor's implementation of COO. NSO had the procedures, processes, and personnel in place that would ensure that the COO objective would be met but had not demonstrated the proper execution of procedures and processes by the personnel with assigned responsibilities, resulting in the CDNS review identifying three findings, two weaknesses, and three opportunities for improvement (OFIs).

Based on the previously identified COO issues at NSO, HSS determined that increased HSS awareness was warranted to assess the current level of NSO compliance with COO requirements and expectations for performing adequate Federal oversight safety of its nuclear and high hazard activities.

Result:

The recent NSO assessment was conducted over the period from June 6 through September 30, 2011. The scope of the assessment took into consideration the results of previous contractor assessments, documented COO issues (Federal and contractor), operational awareness activities by the Facility Representative Group (FRG) and shadow assessments conducted by the FRG. The scope of the NSO assessment also reviewed implementation of COO for quality control and implementation of Integrated Safety Management processes.

The NSO assessment team determined that the overall performance of the site contractor, National Security Technologies, LLC (NSTec), met the majority of the reviewed Criteria, Review and Approach Documents (CRADs). While the majority of the objectives were met, the 18 findings and 21 OFIs identified by the NSO team suggest there is still general weakness across most of the facilities reviewed in the COO SMP functional area. In addition, one facility failed to meet the objectives of the CRADs (i.e., the Radiological/Nuclear Countermeasures Test & Evaluation Complex).

Of the nuclear facilities subject to HSS independent oversight, the Device Assembly Facility (DAF)/National Criticality Experiments Research Center (NCERC), the U1a Complex [including Sub-Critical Experiment (SCE) activities] and the Radioactive Waste Management Complex (RWMC), all met the assessment objectives associated with DOE O 5480.19 implementation. DAF/NCERC had 11 findings and 8 OFIs, and failed to meet one review criterion related to independent verifications (i.e., operators are trained in the appropriate techniques for verifying the positions of all facility components). The U1a Complex had one OFI. The RWMC had one finding and three OFIs. Many of the issues identified by the NSO review team are a result of inaccuracies associated with the COO applicability matrices for the facility under review and the flow-down to facility procedures. Also, the NSO team noted that the contractor's Contractor Assurance System (CAS) is still not mature in its application to the COO SMP functional area.

NSTec is addressing the issues in the report and designating appropriate corrective actions. The Federal line oversight by the FRG will continue at the current FY 11 transactional level until the COO SMP functional area achieves the sustainment level as defined in the NSTec Performance Evaluation Plan for FY 12. HSS concurs with the NSO management assessment team's conclusions and the path forward by NSTec and the FRG to resolve the identified COO issues and provide improved assurance of safety for its nuclear and high hazard activities.

HSS Participants	References
1 (lead). William Macon	

Were there any items for HSS follow up? Yes No

HSS Follow Up Items

- None.