| | | | | _ | |
|-----------------------------|------------------|--|--|--|--|
| HSS Independe | nt Activity | y Report - Rev. 0 | Report Number: 1 | HIAR PORTS-2012-09-24 | |
| Site: Portsmouth G | aseous | Subject: Office of | Enforcement and Overs | sight's Office of Safety and Emergency | |
| Diffusion Plant | | Management Evaluations Activity Report for Operational Awareness | | | |
| | | Oversigh | Oversight of the Portsmouth/Paducah Project Office (PPPO) Performance of | | |
| | | the Contractor Assurance System (CAS) Program | | | |
| Dates of Activity: | 09/24/12 – | 10/04/12 | Report Preparer: | Joseph P. Drago | |
| Activity Description | /Purpose: | | | | |
| The Office of Health, | Safety and S | Security (HSS) shadov | wed PPPO's review of s | pecific elements of the Fluor-B&W | |
| Portsmouth (FBP) CA | AS program a | t the Portsmouth Gas | eous Diffusion Plant (Po | ORTS). The review was limited to three | |
| requirements of Depa | rtment of En | ergy (DOE) Order 22 | 6.1B, Implementation of | f Department of Energy Oversight Policy: | |
| (1) FBP's submittal o | of the initial C | CAS to the DOE Cont | racting Officer for revie | w and approval; (2) performance of | |

Result:

The PPPO review team adequately executed the review plan through their review of documentation, interviews, and observation of the problem report screening committee. The PPPO team, consisting of four experienced personnel, identified six findings and nine observations. HSS reviewed the team's report and agrees with the categorization of the findings as conditions adverse to quality. The PPPO team adequately assessed the requirements listed in the review plan and appropriately documented the assessors' observations and conclusions.

contractor assessments; and (3) implementation of the contractor issues and corrective action management program. The PPPO review included document reviews, interviews, and observation of the problem report screening committee review.

FBP addressed each of the findings and observations from the PPPO assessment by noting either the completed action taken or a commitment to correcting the condition by a specified date. The stated actions completed and planned and the extent-ofcondition reviews were appropriate. FBP's response suggested that the PPPO assessment was premature because FBP had not had sufficient time to implement the procedures that had been developed to establish the CAS. FBP acknowledged that since the facilities had previously operated under the Nuclear Regulatory Commission's requirements and not DOE's, the previous contractor had not established a CAS. At the time of the surveillance, PPPO had scheduled the Integrated Safety Management System (ISMS) Phase I (documentation) verification for November 2012. The Phase II verification (implementation) is not scheduled until late calendar year 2013. FBP considered that most of the assessment findings resulted from lack of time to fully implement the new CAS processes and expects that those processes will be in place when DOE conducts the ISMS Phase II verification. PPPO concurred with FBP's submitted corrective actions.

In November 2012, HSS performed an Independent Oversight activity of PPPO's ISMS Phase I verification review of FBP. The Independent Oversight team concurred with the findings, observations, and overall conclusion of the PPPO verification team, which was thorough and effective in identifying both strengths and deficiencies within the scope of the review.

| HSS Participants | References | |
|-------------------------------------|---|------------|
| 1(lead). Joseph P. Drago | Review Plan for the Independent Assessment of the Fluor-B&W Portsmouth | |
| | Contractor Assurance System Program Implementation at the Portsmouth Gas | seous |
| | Diffusion Plant, PPPO-12-IA-100457, September 2012 | |
| | Report of the Independent Assessment of the Fluor-B&W Portsmouth Contra | ctor |
| | Assurance System Program Implementation at the Portsmouth Gaseous Diffu | sion |
| | Plant, PPPO-12-IA-100457, November 8, 2012 (PPPO-03-1717116-13) | |
| | FBP Response to the Report of the Independent Assessment of the Fluor-B&V | W |
| | Portsmouth Contractor Assurance System Program Implementation at the Por | rtsmouth |
| | Gaseous Diffusion Plant, PPPO-12-IA-100457, November 8, 2012 (PPPO-03 | - |
| | 1717116-13), dated December 11, 2012 (FBP-12-1026) | |
| | PPPO Response to FBP Corrective Action Plan for Independent Assessment | of the |
| | Fluor-B&W Portsmouth Contractor Assurance System Program Implementation | ion at the |
| | Portsmouth Gaseous Diffusion Plant, PPPO-12-IA-100457, dated January 7, 2 | 2013 |
| Were there any items for HSS follow | 9? ⊠Yes □No | |

HSS Follow Up Items

Review PPPO's ISMS Phase I verification review of FBP. (In November 2012, HSS performed an Independent Oversight activity of PPPO's ISMS Phase I verification review of FBP.)