

LANL Waste Characterization, Reduction, and Repackaging Facility DOE ORR 7/21

OPERATIONS (OP)

OBJECTIVE

OP. 1: The formality and discipline of operations, considering operations and support personnel, are adequate to conduct work safely and programs are implemented to maintain this formality and discipline. **(CRs 1, 7, 11, and 13)**

CRITERIA

1. WCRR has an NNSA-approved Conduct of Operations (COO) Matrix. (DOE O 5480.19)
2. There are adequate and correct programmatic procedures, processes, and other work control documents in place to implement the applicable elements of DOE O 5480.19 and the requirements of the WCRRF TSRs (DOE O 5480.19; DOE O 433.1, 10 CFR 830.120, WCRRF TSR 5.6.3)
3. Performance of conduct of operations is observed to be adequate (i.e., logkeeping, shift turnover, timely orders, equipment labeling, review of surveillance, operational formality and work control). (DOE O 5480.19)
4. A routine Operations Drill program has been developed and implemented at WCRRF. Program records including drill scenarios, schedules, and post drill critiques and reports indicate the program is effective. (DOE O 5480.19; DOE O 5480.20A)
5. A structured assessment program of implementation of COO is planned and accomplished, documented, with corrective actions established and tracked to completion. (DOE P 450.4; DOE Order 5480.19; DOE O 226.1; 10 CFR 830.120)

APPROACH

Requirement:

- DOE Order 5480.19, *Conduct of Operations Requirements for DOE Facilities*

Document Review:

- LASO approved Conduct of Operations Applicability Matrix that includes WCRR operations.
- WCRR implementing processes and procedures for each applicable element of conduct of operations.
- WCRRF Technical Safety Requirements
- SER for the WCRRF
- DOE Order 5480.19, Conduct of Operations Requirements for DOE Facilities
- LANL Conduct of Operations Manual, Implementation Support Document ISD 315-1.0
- LANL IMP 315, Conduct of Operations
- ConOps management assessment results.
- CORR final report and Corrective Action closure packages for findings in Operations Functional Area.

- Operational documentation associated with conduct of operations such as logs, checklists, shift turnover records, daily orders, standing orders, etc.
- Operational drill program records
- Staffing documentation (e.g., “watch bill”)

Interviews:

- WCRR Facility Manager
- WCRR supervisors
- WCRR operators (sample)
- Selected functional support staff assigned to support WCRR activities
- Craft personnel who support WCRR (sample)

Observations:

- WCRR operational demonstrations, including pre-shift briefings and post activity debriefs
- Observation of operational drills
- Routine facility operations including shift turnover and surveillance activities
- WCRR facility walkdown
- Operator response to discovery of unanticipated radiological item (higher activity than anticipated) in a drum
- Operator response to a simulated fire in the glovebox or other selected operational drill
- Daily Surveillance Inspections for WCG Glovebox Confinement and for BUILDING TA-50-69 Confinement ventilation system.

OP.2

OBJECTIVE

OP. 2: Sufficient numbers of knowledgeable and qualified personnel are available to conduct and support operations at the WCRRF. The level of knowledge of operations personnel is adequate to support WCRRF operations. (CRs 3, 4, 6, and 7)

CRITERIA

1. WCRR operators and staff are familiar with any stop work activities associated with not fulfilling the TSR requirements for the facility.
2. WCRR operators are knowledgeable and capable of performing the surveillance requirements as defined by the TSRs. (TSR; DOE O 5480.19)
3. Sufficient numbers of trained and qualified personnel are available to meet minimum staffing requirements and support operations. (WCRRF TSR 5.2.3; DOE O 5480.20A)
4. The level of knowledge of operations personnel associated with WCRR is adequate to permit safe operations. (DOE O 5480.19; DOE O 5480.20A)

APPROACH

Requirement:

- DOE Order 5480.19, *Conduct of Operations Requirements for DOE Facilities*

Document Review:

- LASO approved Conduct of Operations Applicability Matrix that includes WCRR operations.
- WCRR implementing processes and procedures for each applicable element of conduct of operations.
- CORR final report and Corrective Action closure packages for findings in Operations Functional Area.
- Staffing documentation (e.g., “watch bill”)

Interviews:

- WCRR Facility Manager
- WCRR supervisors
- WCRR operators (sample)
- Selected functional support staff assigned to support WCRR activities
- Craft personnel who support WCRR (sample)

Observations:

- WCRR operational demonstrations including pre-shift briefings and post activity debriefs
- Observation of operational drills
- Routine facility operations including shift turnover and surveillance activities
- WCRR facility walkdown
- Operator response to discovery of unanticipated radiological item (higher activity than anticipated) in a drum
- Operator response to a simulated fire in the glovebox or other selected operational drill

- Daily Surveillance Inspections for WCG Glovebox Confinement and for Building TA-50-69 Confinement ventilation system.

OP.3

OBJECTIVE

OP. 3: Adequate and correct procedures and safety limits are in place for operating the process systems and utility systems that include revisions for modifications that have been made to the facility. **(CRs 8, 9, 10, and 13)**

CRITERIA

1. Procedures are developed, issued, revised and controlled as required by DOE Order 5480.19. (DOE O 5480.19; DOE O 433.1)
2. Operations personnel follow procedures, work control documents and other implementing methods. When procedures cannot be followed, work is stopped until they are corrected. (DOE P 450.4; DOE O 5480.19)
3. Procedures for all In Service Inspection (ISI) that comply with requirements of the TSR have been developed and accomplished. All ISIs have been completed satisfactorily and are current. (TSR Section 6.0)
4. WCRRF Reviews and audits (TSR 5.5) appropriately address procedure development, use, and management. Results indicate the procedure program is satisfactory. (TSR; DOE O 5480.19; 10 CFR 830.120)

APPROACH

Requirement:

DOE Order 5480.19, Conduct of Operations Requirements for DOE Facilities

Document Review:

- Review processes used in writing and formatting procedures to ensure that procedures are written and formatted in accordance with acceptable formality of operations procedures
- Review Nuclear operations procedure processes to ensure that procedures are checked for accuracy and functionality by a Verification and Validation process prior to approval and issue
- Review procedure processes to ensure that procedures used to implement requirements of the DSA/TSRs are screened through a USQ process if changed, or modified.
- Review procedure processes to ensure that a configuration control process is in place for the issuance, and approval of new or revised procedures.
- Review procedure processes to ensure that adequate training is provided prior to the performance of new or revised procedures.
- LASO approved Conduct of Operations Applicability Matrix that includes WCRR operations.
- WCRR implementing processes and procedures for procedure development, use, maintenance, and configuration management.
- ConOps management assessment results with emphasis on procedure development and use.
- CORR final report and Corrective Action closure packages for findings in Operations Functional Area.

- Operational documentation associated with conduct of operations procedure development, use, and maintenance
- Selected operational procedures
- All ISI procedures and documentation of first use of each.
- Reviews and audits applicable to procedures including schedules, review plans, and review results.

Interviews:

- WCRR Facility Manager
- WCRR supervisors
- WCRR operators (sample)
- Selected functional support staff assigned to support WCRR procedure development and maintenance
- Craft personnel who support WCRR (sample)

Observations:

- WCRR operational demonstrations including pre-shift briefings and post activity debriefs
- Observation of operational drills
- Routine facility operations including shift turnover and surveillance activities
- Procedure development processes such as V&V, procedure training, and procedure configuration management processes.

OP.4

OBJECTIVE

OP.4: An adequate startup plan has been developed for starting the WCRR facility that includes plans for graded operations and testing after startup to simultaneously confirm operability of equipment, the viability of procedures, and the performance and knowledge of the operators.
(CR 12)

CRITERIA

1. The Start-up Plan (SUP) has been developed and approved. (DOE O 425.1C, DOE STD 3006-2000)
2. The SUP reflects deliberate, controlled actions including criteria for escalation and exit from the plan requirements. (DOE O 425.1C, DOE STD 3006-2000)
3. Management Oversight has been specifically required in the plan. Specific expectations for the management oversight are defined. Hold points are specified. (DOE O 425.1C, DOE STD 3006-2000)
4. WCRRF SUP is successfully demonstrated during operations. Required reports and records are maintained. Supervisory watches function as specified in the SUP. Hold points are exercised as applicable. (SUP; DOE O 425.1C, DOE STD 3006-2000)
5. Compensatory measures are defined and implemented with provisions for phase out as confidence is gained. (DOE O 425.1C, DOE STD 3006-2000)

6. Required documentation is identified to demonstrate effective implementation of the plan. (DOE O 425.1C, DOE STD 3006-2000)
7. The level of knowledge of personnel concerning their roles and responsibilities with respect to the SUP is adequate based on interviews and observation during operations. (DOE O 425.1C, DOE O 5480.20A)

APPROACH

Requirement:

- DOE O 425.1C, *Startup and Restart of DOE Nuclear Facilities*

Document Review:

- LANL Startup plan for WCRR startup
- CORR Report for Operations Functional Area including final closure packages for findings in the Operational Functional Area.
- Implementing processes and documentation for SUP such as guidance for compensatory measures, records of oversight and monitoring, planning sequence documentation, training records, etc.

Interviews:

- WCRR Facility Manager
- WCRR supervisors
- Identified participants in WCRR SUP

Observations:

Observe implementation of elements of SUP during operational demonstrations, including performance of management oversight and verification of specified compensatory measures