

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

LOS ALAMOS SITE OFFICE (LASO)

OBJECTIVE

LASO.1: Los Alamos Site Office (LASO) programs that provide oversight for WCRR, such as, Project Management, Facility Representative (FR), Authorization Basis (AB), Safety System Oversight (SSO), Safety Subject Matter Experts (SME), Occurrence Reporting, Contractor Assessment (CA), Issues Management, and Quality Assurance (QA) are adequate. **(CR 18)**

CRITERIA

1. Required LASO management, oversight, and assessment programs important to nuclear safety activities specific to WCRR operations such as facility readiness and authorization, program management, nuclear safety, fire protection, emergency management, radiological protection, occupational safety and industrial hygiene, quality assurance, occurrence reporting, contractor assessment, and issues management are adequately defined, effectively integrated into existing LASO programs and are satisfactorily implemented. (DOE O 231.1, DOE O 226.1, DOE O 420.1, DOE O 413.3, DOE O 433.1, DOE O 5480.20A, 10 CFR 830, LASO FRAM)
2. LASO oversight processes include evaluation of the adequacy of implementation of the various Safety Management Programs defined in the WCRR BIO, TSR, and WCRR requirements management. (DOE P 450.4; DOE O 226.1)
3. LASO validation of readiness including the validation of finding closure actions and readiness to oversee WCRR operations is adequate and is reflected in the LASO endorsement to the contractors Readiness to Proceed Memorandum. (DOE 425.1)

APPROACH

Requirements:

- DOE P 411.1, *Safety Management Functions, Responsibilities, and Authorities Policy*
- DOE O 231.1A Chg 1, *Environment, Safety and Health Reporting*
- DOE O 226.1, *Implementation of Department of Energy Oversight Policy*
- DOE O 420.1, *Facility Safety*
- DOE O 413.3A, *Program and Project Management for the Acquisition of Capital Assets*
- DOE O 433.1, *Maintenance Management Program for DOE Nuclear Facilities*
- DOE O 5480.20A, Chg 1, *Personnel Selection, Qualification, and Training Requirements for DOE Nuclear Facilities*
- 10 CFR 830, *Nuclear Safety Management*
- DOE P 450.4; *Safety Management System Policy*
- DOE 425.1C, *Startup and Restart of Nuclear Facilities*
- DOE O 360.1, *Federal Employee Training*

Record review:

- LASO process procedures and management documents that define the LASO oversight program and facility authorization requirements for WCRR operations.

- Recently completed Program Self Assessments for the Facility Representative Program and other WCRR oversight programs.
- LASO's Validation of the GPP Project Execution Plan and project deliverables
- Senior Technical Safety Managers, Facility Representative, Authorization Basis, Safety System Oversight, safety Subject Matter Experts, and Occurrence Reporting training and qualification program documentation and records.
- LASO assessment reports and surveillance oversight plans for WCRR contractor assessments.
- LASO organization chart.
- LASO Safety Evaluation Report approving the WCRR BIO and TSRs.
- LASO WCRR readiness validation report/documentation.
- LASO line oversight and analysis evaluation reports.
- LASO Fire Protection oversight assessments of fire protection programs in support of WCRR
- LASO emergency management procedures that include WCRR
- LASO operational awareness documentation associated with formality of operations.
- LASO oversight records associated with requirements management for WCRR.

Interviews:

- LASO Facility Representative(s) assigned to WCRR and associated support facilities.
- LASO Safety System Oversight engineer assigned to WCRR safety system oversight.
- LASO Program Managers assigned to WCRR as a GPP.
- Authorization Basis review personnel who prepared the SER for the WCRR facility.
- Personnel who oversee the Occurrence Reporting, issues management/operational awareness programs for WCRR Operations.
- LASO Technical Qualification Program Manager
- LASO Safety Subject Matter Experts with WCRR responsibilities (e.g. Radiological Protection Program, Quality Assurance Operations/Startup, Fire Protection, Criticality Safety, Occupational and Industrial Safety and Hygiene (OISH), etc.)

Observations:

- Facility Representative, Safety System Oversight engineer, and subject matter expert field activities at WCRR, including a facility walkdown and a facility surveillance or assessment, as scheduled.
- Determine LASO personnel's understanding of WCRR operations, specifically, operations layout, radiologically controlled areas, process and safety system operations, normal operator routines, abnormal conditions response, emergency and life safety equipment, and backshift activities.

LASO.2

OBJECTIVE

LASO.2: The technical and managerial qualifications of those personnel at LASO who have been assigned responsibilities for providing nuclear safety technical direction, guidance and oversight to the contractor for WCRR are adequate. (CR 16)

CRITERIA

1. Qualification of LASO personnel with oversight responsibilities specific to WCRR operations, such as the LASO Senior Technical Safety Managers, Facility Representatives, Authorization Basis Specialists, Safety System Oversight Engineers, and safety Subject Matter Experts are documented by formal training and qualification requirements, are complete, and are adequate to address the hazards identified with WCRR operations and the required safety controls. (DOE O 360.1; DOE-STD- 1063-2000, 10 CFR 830)
2. The demonstrated level of understanding of the systems, hazards, and controls by LASO personnel with responsibilities specific for verifying readiness and authorizing WCRR operations, such as LASO Senior Technical Safety Managers, Facility Representatives, Authorization Basis Specialists, Safety System Oversight Engineers, and safety Subject Matter Experts is adequate. (DOE-STD-1063-2000, DOE O 226.1, DOE O 420.1, DOE O 425.1, 10 CFR 830)

APPROACH

Requirements:

- DOE P 411.1, *Safety Management Functions, Responsibilities, and Authorities Policy*
- DOE O 420.1, *Facility Safety*
- 10 CFR 830, *Nuclear Safety Management*
- DOE P 450.4; *Safety Management System Policy*
- DOE O 360.1, *Federal Employee Training*

Record review:

- LASO process procedures and management documents that define the LASO oversight program and facility authorization requirements for WCRR operations.
- Recently completed Program Self Assessments for the Facility Representative Program and other WCRR oversight programs.
- Senior Technical Safety Managers, Facility Representative, Authorization Basis, Safety System Oversight, safety Subject Matter Experts, and Occurrence Reporting training and qualification program documentation and records.
- LASO assessment reports and surveillance oversight plans for WCRR contractor assessments.

Interviews:

- LASO personnel assigned to oversee WCRR operations to determine their understanding of operations, safety envelope, past incidents and occurrences, conduct of operations principles, and stop work authority relating to WCRR operations. Personnel include:
- LASO Facility Representative(s) assigned to WCRR and associated support facilities.
- LASO Safety System Oversight engineer assigned to WCRR safety system oversight.
- Authorization Basis review personnel who prepared the SER for the WCRR facility.

- Personnel who oversee the Occurrence Reporting, issues management/operational awareness programs for WCRR Operations.
- LASO Technical Qualification Program Manager
- LASO safety Subject Matter Experts with WCRR responsibilities (e.g. Radiological Protection Program, Quality Assurance Operations/Startup, Fire Protection, Criticality Safety, Occupational and Industrial Safety and Hygiene (OISH), etc.)

Observations:

- Facility Representative, Safety System Oversight engineer, and subject matter expert field activities at WCRR, including a facility walkdown and a facility surveillance or assessment, as scheduled.
- Determine LASO personnel's understanding of WCRR operations, specifically, operations layout, radiologically controlled areas, process and safety system operations, normal operator routines, abnormal conditions response, emergency and life safety equipment, and backshift activities.