

HSS Independent Activity Report - Rev. 0

Report Number: HIAR-HORP-2011-04-18

Site: Office of River Protection**Subject:** Office of Independent Oversight's Office of Environment, Safety and Health Evaluations Activity Report for the Selected Aspects of Tank Farms Unreviewed Safety Question Process Implementation**Dates of Activity** 02/21/2011 - 04/18/2011**Report Preparer**

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Activity Description/Purpose:

The purpose of the activity, which was performed by the Office of Health, Safety and Security (HSS) as part of the Department of Energy (DOE) Office of River Protection's (ORP's) nuclear safety assessment and oversight, was to review and evaluate selected aspects of the Tank Farms Operating Contractor's (TOC's) implementation of the recently revised unreviewed safety question (USQ) procedure. A major aspect of the revised implemented process (Ref. 1) was to eliminate unnecessary screening and to streamline the USQ process by defining facility and procedure changes that are outside the scope of this process and for which the USQ process would not be applicable (called the "N/A Process").

The assessment included a detailed review of various types of documents reflecting changes to facility documents (e.g., work orders and procedures) that were issued during a specific period and that were determined by qualified USQ evaluators as not requiring USQ evaluation because the changes were considered "N/A" or outside the scope of the USQ process. These documents included Engineering Change Notices (ECNs), Technical Procedures, Administrative Document Change Authorizations (ADCA), Document Acceptance Review Form (DARF), Work Orders, and documents released by Engineering Data Transmittals (EDT). The documents reviewed in the assessment were issued by the TOC during the period from September 16, 2010, to January 31, 2011. This period, therefore, was after the end date of the facility and document changes that were reviewed in a previous review by the TOC (i.e., a November 2010 TOC management assessment of the USQ process). The scope of the HSS assessment also included interviews with key USQ personnel and a review of the November 2010 TOC assessment report and subsequent corrective actions.

Result:

The assessment team concluded that the "N/A" process implemented by Revision E of TFC-ENG-SB-C-03 had significant value in streamlining the USQ process, and had an added benefit of improving the quality of the USQ determinations performed on change documentation. In addition, the corrective actions implemented since the November 2010 TOC management assessment had improved the implementation of this new process.

However, the assessment team identified several inadequacies including:

- The use of procedures from a different Hanford site contractor for the maintenance of certain equipment, and modified by that contractor, without performing a USQ evaluation or an evaluation for "N/A."
- Inappropriate use of "N/A" on change documents potentially affecting the nuclear facility.
- Instances of change documentation determined as "N/A" by individuals other than qualified USQ evaluators.
- Incorrect application of the example of "Routine maintenance activities" (specified as items that could be considered out of scope and, therefore, categorized as N/A) to exclude *any* change to a routine maintenance *activity or procedure*.
- Instances of erroneous application of the process (e.g., incorrect exclusion category, deviation from engineering change control requirement).
- Lack of an adequate method to track and retrieve all change documentation that had been considered out of scope of the USQ process.
- Lack of criteria or insufficient explicit examples in the USQ procedure for when the "N/A" process is applicable.

Some of the inadequacies in implementation of the USQ process identified by the team could be traced to potential weaknesses in the revised USQ procedure itself. Additionally, the HS-45 participant identified other potentially significant inconsistencies between the Tank Farms USQ procedure (Ref. 1) and the DOE guide on USQ implementation (Ref. 2); these were outside of the scope of the subject assessment but were brought to the attention of ORP.

The HS-45 participant's overall observation was that the ORP assessment was well planned, properly staffed, appropriately coordinated, and thoroughly conducted. The interactions among the team members, as well as between the assessment team and the TOC were open and effective. The final report (Ref. 3) followed ORP's guidance and provided sufficient detail on the various findings and observations. The team recommended appropriate follow-up ORP surveillances and assessments, including an additional TOC review of the "N/A" process in conjunction with an overall assessment of the USQ process compliance with DOE regulation and guidance, and further assessment by ORP to ensure continued improvement in the implementation of the USQ process. The ORP transmittal letter to the TOC provided appropriate direction for these actions.

HSS Participants	References
1. Shivaji S. Seth	1. TFC-ENG-SB-C-03, Rev. E, <i>Unreviewed Safety Question Process</i> , November 30, 2010.
	2. DOE G 424.1-1B, <i>Implementation Guide for Use in Addressing Unreviewed Safety Question Requirements</i> , April 2010.
	3. 11-NSD-032, Assessment Report A-11-NSD-TankFarm-001, <i>Assessment of Tank Farm Unreviewed Safety Question (USQ) Process</i> , ORP Letter from P.G. Harrington to A.B. Dunning, Contracts Manager, Washington River Protection Solutions.
Were there any items for HSS follow up? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
HSS Follow Up Items	
1. Follow up with ORP to determine if an ORP surveillance of the USQ out-of-scope document, RPP-27195, is performed to ensure that all potential changes for the items listed in that document could be excluded from the USQ process.	
2. Follow up with ORP to ensure ORP conducts an adequate review of TOC corrective actions to ensure that its USQ process is compliant with 10 CFR 830.203 and consistent with DOE guide G 424.1-1B.	