

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

MAINTENANCE (MN)

OBJECTIVE

MN.1: LANL line management has established a Maintenance Program to ensure safe accomplishment of work within the requirements of the safety basis documents and regulatory permits necessary for WCRR Facility operations and activities. Sufficient numbers of qualified maintenance personnel as well as adequate facilities and equipment are available to support WCRRF operations (**CRs 1, 4, 6, 7, 8, 9, 10, and 12**).

CRITERIA

1. The WCRRF Maintenance Management Program is compliant with the WCRRF Technical Safety Requirements (WCRRF TSR 5.6.7, 10 CFR 830).
2. Surveillance tests and in-service inspections have been developed, performed, and are tracked for safety systems identified in the BIO and TSRs (WCRRF TSRs).
3. The WCRRF Maintenance Management Program is compliant with a DOE-approved MIP which, on a graded approach, addresses the 10 elements identified under DOE O 433.1A, 4.c.
4. The MEL is current and effective (DOE O 433.1A).
5. The WCRRF Maintenance Management Program has established performance metrics to measure program performance and problems needing correction (DOE O 433.1A, 4d).
6. The WCRRF Maintenance Management Program is integrated with other DOE requirements (DOE O 433.1A, 4.e).
7. The WCRRF Maintenance Management Program identifies appropriate voluntary consensus standards that must be incorporated into the program (DOE O 433.1A).
8. The WCRRF Maintenance Management Program MIP is reviewed and approved every two years and any changes submitted to the DOE approval authority (DOE O 433.1A).
9. The WCRR work control process ensures that systems are adequately tested for operability following maintenance or modification. (DOE O 420.1B)
10. Systems, including calibrations, are current/operational as required to support start-up (DOE O 433.1A).
11. The level of knowledge of maintenance personnel concerning their roles and responsibilities for WCRR operations is adequate. (DOE O 5480.20A)
12. There are adequate numbers of trained, qualified personnel available to support the maintenance program (DOE O 433.1A).

APPROACH

Requirements:

10 CFR 830, *Nuclear Safety Management*

DOE O 226.1, *Implementation of Department of Energy Oversight Policy*

DOE O 414.1C, *Quality Assurance*

DOE O 420.1B, *Facility Safety*

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

DOE O 433.1A, *Maintenance Management Program for DOE Nuclear Facilities*

DOE Order 5480.20A, *Personnel Selection, Qualification, and Training Requirements for DOE Nuclear Facilities*

Document Review:

- WCCR BIO, TSRs, and SER
- EP-PLAN-0101; Integrated Formality of Operations Plan for Environmental Waste Management Operations (EWMO)
- WCCR maintenance, surveillance and in-service inspection program documentation
- Approved MIP which includes WCCR requirements
- WCCR LCO surveillance and in-service inspection records
- WCCR equipment maintenance schedules
- WCCR equipment checklist/inspection/maintenance records
- Calibration records for WCCR installed equipment and M&TE required in support of WCCR
- Assessments of WCCR maintenance program/processes for past 6 months and corrective action reports
- CORR Final Report and Corrective Action Packages for Maintenance Findings
- ISD950-1.0 LANL Conduct of Maintenance Manual
- Previous assessment results of maintenance activities for closure/scheduling of identified issues (LIMITS).
- Selected work packages to be reviewed for lessons learned and a mechanism to incorporate into future work activities.

Interviews:

- WCCR Facility Manager
- WCCR Maintenance Manager
- Maintenance workers who support WCCR
- Maintenance supervisor responsible for WCCR
- Cognizant System Engineers responsible for WCCR VSS

Observations:

- WCCR surveillances and preventative maintenance items as available
- Maintenance work planning at WCCR