

# memorandum

Idaho Operations Office

Date: May 7, 2007

Subject: CSSG Annual Review of Site Criticality Safety Infractions and Deficiencies Addressing  
Calendar Year 2006

To: J. N. McKamy, Manager  
Nuclear Criticality Safety Program

In Tasking 2007-02 (Attachment 1), the Criticality Safety Support Group (CSSG) was asked to: 1) review the process and results from the first annual review and to recommend changes in scope and conduct of the review in order to identify improvements; and 2) recommend sites requiring a review in 2007 and a resource loaded schedule for conducting the review and providing the final report. Response to this tasking was the subject of a CSSG conference call on April 26, 2007.

Based on the results of site reviews that were reported in response to Tasking 2006-01, and the earlier effort by the Criticality Safety Coordinating Team (CSCT), the CSSG recommends that the approach to this task be modified.

### Background

The CSCT tried unsuccessfully to compile data on low-level criticality safety infractions and to project trends that would be useful to the entire complex. Because of the differences used to evaluate and categorize the severity of incidents, and even the incident reporting threshold, no clear pattern could be established that was applicable to the complex or even to multiple sites.

The CSSG review of infractions during calendar year 2005 identified two global issues: management is generally not being briefed on low-level, non-reportable occurrences; and occurrence categorization at all levels is inconsistent and misleading.

In addition, recent feedback from the CSCT via the NCSP Program Manager has indicated that the use of the NCSEs (that were related to the various ORPS-reportable events in 2005) may have been non-uniform from site-to-site and led to some of the variability in characterization and reporting these events.

### Proposed Approach

Due to limited resources for conducting site visits, and the fact that determination of a complex-wide trending pattern has proven to be not achievable, the CSSG proposes a limited site-oriented approach.

The chairman of the CSSG will write to the local member of the CSCT asking for a summary of all reported/documentated infractions that were identified in CY2006. The results of these queries will be used as indicators to help determine if a specific site visit is warranted.

In addition, if any CSSG members will, in the coming few months, participate in a criticality safety review at a site, they will be asked to try to schedule a review of documented infractions with the appropriate person at the site. Depending on the scope of the primary review and time constraints, this may not be possible, but should be considered when developing the review schedule. The local member of the CSCT would also be asked to participate in this review.

CSSG members who are close to specific sites will be asked to conduct reviews of documented infractions at those sites. This will minimize the need for CSSG travel and conserve funding allocations and CSSG members' time for other projects and meetings.

Until the results of the inquiries to the sites are returned, only the following sites have been identified for potential review of CY2006 infractions: LANL, Y-12 and ORNL.

Y-12 and ORNL are the subjects of planned criticality safety reviews that include one or more CSSG members. It is not clear if the review team members will be able to include the violation review in their schedule, but an attempt will be made. A backup position would be to ask one or more CSSG members from ORNL to conduct brief interviews with the appropriate criticality safety staff at the two locations. Tom McLaughlin has agreed to conduct the LANL review with the help of Jerry Hicks.

During the review of the ORPS-reported events, particular attention will be given to the NCSE associated with the operation in question to provide an independent assessment of the appropriateness of the assigned categorization.

#### Schedule

Requests for information on CY2006 infractions will be sent to site contacts by May 11, 2007. The request will include, for any ORPS-reportable infractions, a request for a copy of the associated NCSEs.

The final list of sites to be included in this review will be submitted to the NCSP manager by May 18, 2007.

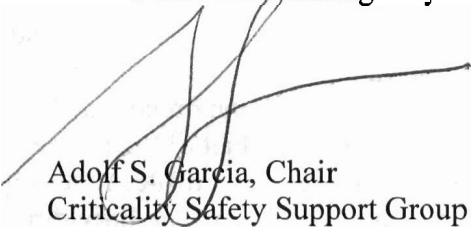
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Site reviews will be scheduled between May 21, 2007, and July 13, 2007

The final report will be prepared and submitted to the NCSP manager by July 27, 2007.



Adolf S. Garcia, Chair  
Criticality Safety Support Group

Attachment

Task Title: CSSG Second Annual Review of Site Criticality Safety Infractions and Deficiencies Occurring in Calendar Year 2006

Task Statement: The CSSG is requested to plan and conduct the second annual review of site criticality safety infractions and deficiencies that occurred in calendar year 2006. As part of the plan, the CSSG is requested to review the process and results from the first annual review and to recommend changes in scope and conduct of the review in order to identify improvements. Also, the CSSG is requested to recommend sites requiring a review in 2007 and a resource loaded schedule for conducting the review and providing the final report. Finally, the CSSG is requested in their final comprehensive report to include recommendations for site-specific and broad programmatic improvements to improve criticality safety and to recommend ways to best promulgate lessons learned throughout the DOE. As with the first annual review process, the CSSG teams should provide site-specific feedback to contractor and DOE site management promptly upon the completion of each site review. The reviews should be led at each site by a CSSG member but may utilize CSCT members as well.

Task Deliverables:

1. Implementation plan with recommendations and milestones provided to the NCSP Manager.
2. Final comprehensive report covering all the site reviews containing lessons learned and recommendations.