

### Department of Energy

Savannah River Operations Office P.O. Box A Aiken, South Carolina 29802

# JUN 27 2016

Mr. Harold Simon, Chairperson Savannah River Site Citizens Advisory Board P.O. Box A Aiken, South Carolina 29802

Dear Mr. Simon:

# SUBJECT: Citizens Advisory Board (CAB) Recommendation Number 334 – Nuclear Materials Operations Review (Letter, Simon to Craig, CAB Recommendation Number 334 – Nuclear Materials Operations Review, 05/24/16)

Department of Energy (DOE) partially accepts your recommendation concerning Nuclear Materials Operations Review. As communicated to the CAB during Nuclear Materials Facilities updates, Savannah River Nuclear Solutions (SRNS) conducted a root cause analysis and extent of condition review regarding the Technical Safety Requirements (TSR) and Nuclear Criticality Safety Evaluation (NCSE) violations referenced in the recommendation. The DOE concluded the reviews adequately identified the causes of the events and appropriate corrective actions were taken or are planned. Below, please find the Department's responses to the elements of your recommendation.

# Elements 1-3. Not Accepted

Procedure review by an additional supervisory level does not address any of the identified causes of the event therefore allocating/requesting additional funds to hire supervisors is not warranted. Corrective actions were identified and are being implemented regarding less-than-adequate engagement by line management that was determined to be a cause of the event.

### Element 4. Not Accepted

Section 5.3 of Procedure 1.3 in the Conduct of Operations Manual provides adequate guidance regarding procedure review by the Shift Operations Manager or designee by the end of the shift on which they were performed but no later than the end of the next shift. No changes to the procedure are needed.

### Element 5. Not Accepted

Team composition was not identified as a cause of the HB-Line TSR/NCSE violations. The Direct causes included 1) Willful procedure violation, 2) Unwillingness to call a timeout, 3) Departure from Conduct of Operations, 4) First Line Manager Performance and 5) Less-than-adequate management engagement. In general, qualifications to perform the work drive team composition. Periodically changing team composition does not address the identified causes of the event.

#### Mr. Simon

# Element 6. Accepted

The Department will request that SRNS assess the topics described in this element as part of the SRNS independent assessment.

#### Element 7. Accepted

DOE will work with the CAB to include in the work plan, a presentation on the results of the SRNS effectiveness review when it is completed. The review is expected to complete by December 2017.

#### Element 8. Accepted

DOE will work with the CAB to include in the work plan, a presentation on the results of the independent review of SRNS' Nuclear Criticality Safety Program. The review is expected to complete by April 2018.

In the background information of the recommendation you indicate, "The problem was only discovered four days later by an engineer who was checking other unrelated paperwork and, only by accident, noticed the improper packaging and reported it." Please note that the discovery of the error, although not timely, was not an accident but was discovered during an engineering supervisory review of a relevant report that revealed the Tamper Indicating Devices were attached to pails rather than the carts.

If you have any questions, please contact me or have your staff contact Patrick McGuire at (803) 208-3927.

Sincerely.

Savannah River Site Manager

NMPD-16-0062

cc:

Kristen Ellis, (EM-3.2), DOE-HQ David Borak, (EM-3.2), DOE-HQ Gary Deleon, (EM-22), DOE-HQ Michael Mikolanis, DDFO, DOE-SR Patrick McGuire, DDFO, DOE-SR Catherine Heigel, SCDHEC Gwen Keys, USEPA Mark Williams, GADNR