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From: Meredith Brown <racer@lanl.gov>
Subject: Yellow Alert: Compliance Readiness Review Skills

Title: Sufficient Breadth with Respect to Conformance with LMITCO Company Procedures

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Lesson Learned Statement: Environmental Restoration (ER) project teams preparing to perform work in a nuclear facility should ensure that they have expertise on their team in the area of nuclear facility Conduct of Operations, and that they possess a thorough understanding of the rigor, depth and breadth required in performing procedural compliance readiness reviews.

Discussion of Activities: In March 1999, DOE-ID conducted a Line Management Assessment (LMA) to determine operational readiness of the OU 7-10 Staged Interim Action (Pit 9). After reviewing the contractor Management Self Assessment (MSA) Report, the LMA Team determined that while the MSA team had "...ensured that the project identified...was in conformance with the applicable environmental regulation (CERCLA) requirements of the FFA/CO and job-specific safety documents (e.g. JSA, USQ, HASP)", the "...MSA lacked sufficient breadth to verify the project was in conformance with all the applicable management control procedures." This post-start finding led to the conclusion by the LMA Team that the "...MSA lacked sufficient breadth to ensure the project operation was ready to move inside the RWMC operations area."

Analysis: This finding occurred because the project team did not fully appreciate the degree of rigor necessary to thoroughly apply company procedures and Conduct of Operations to an environmental investigation at a nonreactor nuclear facility. This lack of appreciation was due to the fact that while the team was highly experienced with environmental investigative drilling at other highly contaminated sites on the INEEL, they had limited nuclear operations experience. As a result, they did not recognize that the requirements of this environmental restoration (ER) project far exceeded those of other CERCLA actions performed at the INEEL to date.

Recommended Actions: Each ER project being performed within a nuclear facility should a) perform a thorough, detailed review of the MCPs identified in the appropriate Conduct of Operations Matrix (general ER Matrix or Facility-specific Matrix, as required) to ensure all identified requirements are applicable and are being met; and b) evaluate ALL company requirements (e.g. MCPs, PRDs, STDs, etc.) against the project operation to ensure compliance. The project has an excellent template/guide to follow, which will make this formidable task much easier to complete.

Priority Descriptor: YELLOW

Functional Category(s) (DOE): Environmental Restoration and Waste Management

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