

Date Wed, 08 Dec 1999 151751 -0700
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Subject: Blue Alert- Safety Basis Documents

Title: Blue Alert-Do Not Include the Names of Organizations in Safety Basis Documents

Date September 28, 1999 Identifier INEEL-1999-381

Lesson Learned Statement- In preparing a facility authorization agreement it was discovered that a condition existed that the current organizational structure was outside the administrative technical specification limit. Recent company organizational changes to a site area director concept and facility administrative responsibility, violated the current organization as defined for the facility in the administrative limit. The reporting organization was specifically defined as an administrative specification under the Administrative Controls section of the Technical Specifications. Had the Technical Specifications not been so detailed in the specific organization structure in effect at a particular time (when the document was signed), the violation would not have occurred.

Discussion of Activities- There have been several past instances that should have highlighted the vulnerability of writing authorization basis documents in too much detail. Specifying who was to perform certain actions or specifying the process to meet administrative controls have become a trap when process improvements were made to provide greater reliability or efficiency. Apparently, lessons learned from those previous instances have not been factored into the development of recent authorization bases, including these Technical Specifications, approved as part of the PBF Basis for Interim Operation, in 1995. More fundamentally, management's unfamiliarity with this Administrative Specification precluded the proper USQ screen prior to implementing the organization change. The organization change did not effect facility safety, and the subsequent USQ screen was negative.

Analysis- Authorization Basis documents should clearly state requirements that must be met, but should not identify a particular organization structure by name to maintain requirements. Facility management must be intimately familiar with Facility Authorization Basis Documents, and process Unreviewed Safety Question Screens for any action that could approach the bounding conditions of the Authorization Basis.

Recommended Actions- A recent history of not meeting requirements established by facility authorization basis documents, including the event described in this lessons learned, prompted the INEEL prime contractor to establish a qualification program for all of its Nuclear Facility Managers. A prime element of this program requires that each NFM candidate formally demonstrate detailed knowledge about his or her facility authorization basis documents. As of September 1, 1999, all INEEL prime contractors NFM completed this qualification program. INEEL personnel completing and maintaining this qualification should reduce the probability of events involving violation of facility authorization basis requirements. In the case of the event described in the lessons learned, the more knowledge a NFM has about his or her

facility safety documents, the greater the chances of recognizing unessential wording that could result in violations caused by renaming or changing organization structures.

Priority Descriptor Blue

Functional Category(s) (DOE) Configuration Management, Management

Functional Category(s) (User-Defined) Configuration Management, Management

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Authorized Derivative Classifier D. L. Claflin, 208-526-1199, dfc@inel.gov

Reviewing Official D. L. Claflin

Keywords safety basis documents, authorization

References Occurrence Report ID--LITC-1999-PBF-0001