

R. Meyer, RES

From: "Simpson, Julie J." <simpsonjj@ornl.gov>
To: <ROM@NRC.GOV>
Date: 1/13/06 2:58PM
Subject: Meeting request

Ralph,

I was just forwarded the below email originating from Mike Billone which references a decision by his lab director (see attached article) to discontinue programmatic activity in the alpha gamma hot cell facility, and I would appreciate the opportunity to meet with you to discuss the implications of this decision. Next Wednesday, January 18 I am already planning to be at NRC HQ, and I have not yet scheduled meetings between 10:30-12:45 and after 3:30. If an alternate date is preferable, please let me know and I will make appropriate arrangements.

I look forward to hearing from you.

Thanks,

Julie

Julie J. Simpson
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From: Mike Billone [mailto:billone@anl.gov]
Sent: Friday, January 13, 2006 8:18 AM
To: Chris Brown; Harold Scott (Harold Scott); John Voglewede; Patrick Baranowsky; M. Wayne Hodges; Paul Clifford; Ralph Meyer (Ralph Meyer); Robert E. Einziger; Albert Machiels (Albert Machiels); Gerald Potts (Gerald Potts); Joe Rashid (Joe Rashid); Kurt Edsinger (Kurt Edsinger); Odelli Ozer (Odelli Ozer); Rob Montgomery (Rob Montgomery); Rosa Yang (Rosa Yang); Bert Dunn; Garry Garner; Bruce Hilton; Doug Crawford; Keener Earle; Pete Planchon; Ross Finlay; Anand Garde; Dave Mitchell; David J. Colburn; Mitch Nissley; Ron Kesterson
Cc: Hofman, Gerard L.; Jim Snelgrove; Finlay, Michael Ross; Poeppe, Roger B.
Subject: News to Me
Importance: High

Dear Sponsors and colleagues,

While I have just finished formulating a contingency plan in case the

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AGHCF is closed or the reopening is delayed, I read the following announcement in the Argonne News today (Friday the 13th). After you and I recover from the shock -- if we ever recover, please consider my plan for continuing to generate high-burnup cladding data for LOCA and SNF application, as well as mechanical properties needed to assess normal performance of high-burnup cladding. The Argonne News is located at http://www.anl.gov/Media_Center/Argonne_News/index.html
<http://www.anl.gov/Media_Center/Argonne_News/index.html>

Mike

CC: <PWB@NRC.GOV>, <FXE@NRC.GOV>, "Greene, Sherrell R." <greenesr@ornl.gov>, <binderjl@ornl.gov>

Safety concerns stem from a trio of 'root causes'

A message from Argonne Director Bob Rosner

As most of you know, I've made a point of trying to enhance communications between my office and the laboratory staff; and with this column, I'd like to introduce another "vehicle" for doing just that. Of course, with the new year just started, the substantially better prospects for new and exciting science and technology projects at the lab, and the Department of Energy's draft Request for Proposal just issued last week, there is much to tell!

This time I'd like to focus on safety and, in particular, on the issues raised by the latest DOE-Office of Assessment (OA) audit of our Environment, Safety and Health capabilities, and especially on the nuclear safety area and the consequent involvement of the DOE Price-Anderson Office of Enforcement (OE). This laboratory has done a very good job of reducing the number of general safety-related incidents over the past five years, especially in areas related to operations. As specifically related to nuclear operations, radiation exposure levels — both the average levels and the peak exposure levels — are down as well. These are achievements we can be rightly proud of, and the key issue for us is to continue these trends. The lab just missed the Office of Science safety targets for FY05, but this fiscal year's trends suggest that things are indeed improving yet further.

Given these results, why is it that the OA's most recent audit (carried out in May 2005), as well as the OE's draft enforcement letter, were so highly critical of our safety activities? As you might imagine, answering these questions is critically important to me as a new lab director!

In my view, a very strong hint about what the answer might be lies in the striking fact that if you compare self-assessment of our safety activities (carried out in anticipation of the OA audits) with the DOE audit reports, it is remarkable how different they are: It is perfectly clear that we totally misjudged DOE's expectations. The gaps between what was expected by DOE, and what we thought was appropriate are huge — and they are legion. Indeed, I have it on good authority that the OE draft letter set a new standard in both length and details regarding the lab's nuclear safety operations. In brief, what I see as the key elements (or "root causes") accounting for the clear discrepancies in expectations are:

■ **Culture** : In my view, there are two "cultural" issues. First, we were focused on "outcomes" and not on procedures; the long stretch of good outcomes (i.e., continued improvements in reportable incidents) led to a relaxation of focus on the procedural end of things, to a lack of vigilance in monitoring changes in expectations in the outside world (both in the DOE and the nuclear industry contexts), and to a lack of attention in enforcing uniform procedural standards (and performance) across the lab.

Second, safety issues are often considered to be secondary to programmatic concerns and are seen by many as a bureaucratic imposition; the staff associated with safety has consequently not always had the level of attention and respect that is essential in order to perform their jobs properly. This led to a cascade of other problematic issues, including insufficient training and morale problems. This second issue is related to our focus on outcomes, as well as to the funding problems discussed next.

■ **Funding** : Our relaxation of attention to maintaining standards and executing against them was abetted by the poor funding levels associated with the lab's nuclear facilities. Given that the programmatic and operational aspects of our nuclear facilities were carried out by the same organization structure, and given our long-standing ambitious attitudes towards programmatic work, it was a very short step for programs to economize on the operational end of things, given that the outcomes had continued to be viewed as positive.

■ **Organization** : Finally, the implementation of Integrated Safety Management (ISM) at the lab

has had the key flaw that no effective means were put in place for constant and consistent quality assurance of the ES&H processes. As a result, we are being cited for consequential failures such as not carrying out required (and expected) self-assessments and, in some instances, altogether failing to schedule needed assessments.

While it might seem to many of you that all this is totally new, the key fact is that OE clearly sees our deficiencies as historical and systemic in nature, pointing out that many of the deficiencies identified in the 2005 OA audit are the same as those identified in the earlier 1999 and 2002 OA audits, for which we had submitted corrective action plans — and, as the reports make plain, the plans were never fully implemented.

Where does all this leave us? My view is straightforward: I believe that — for a number of reasons — we have no choice but to fix these problems now. To do otherwise risks everything this lab has worked so hard to attain because DOE will simply not tolerate any other course of action. But most simply, fixing our problems is just the right thing to do — to do otherwise would imply a disregard for the safety of our fellow workers that is, in my view, unconscionable.

The corrective actions we are now implementing have a number of distinct aspects, each one of which addresses one of the three "root causes." One key step is, of course, the timely execution of the detailed (and DOE-approved) Corrective Action Plan that our ES&H folks have developed in response to the various audits; this process is now well underway. But that is far from sufficient — I have directed that the following additional steps be taken:

■ **ES&H Organization** . While ISM is a key aspect of any modern approach to safety, our implementation was incomplete and, in particular, left the central ES&H organization with insufficient clout to carry out many of the key functions — especially assessment — that must remain centralized even under ISM. For this reason, we are creating a new Office for Performance Assurance, which will be led by Bob McCook. Bob will be coming to us from Bechtel Nevada, where he played a leadership role in resolving major nuclear safety problems and changing the safety culture at the Nevada Test Site. The details of the Office of Performance Assurance will be worked out in concert with Audra Karalius, EQO director, and her staff and will include our new Radiation Safety Officer, Gary Zeman, focusing on the nuclear aspects. I expect that we will transition to the new organization this February. The aim is to combine an effective and comprehensive centralized ES&H organization (reporting directly to me) that promulgates safety policies and audits performance with continued reliance on the line organization to actually carry out safe practices, i.e., ISM.

■ **Nuclear Operations** . We will separate programmatic and operational responsibilities for our nuclear facilities, so that all nuclear facility operations will be carried out by a new division whose sole focus will be nuclear operations; we are now in the process of setting up this new division.

■ **Alpha-Gamma Hot Cells** . After the OA and Price-Anderson Amendments Act assessments of last year, I directed that all programmatic work in our Alpha-Gamma Hot Cells be suspended, and I requested a detailed business plan for the continued (future) operations of our hot cells. My original intent was to re-start programmatic work once we could credibly claim that we had addressed all of the DOE's concerns, on the assumption that there is in fact also a credible business plan for moving forward. It turns out that there is no credible business plan, i.e., hot cell work can only continue if the lab chooses to subsidize that work. In my view, such subsidies are unjustifiable, and for this reason, I have directed that the Alpha-Gamma Hot Cells no longer be used for programmatic work. This course of action will also substantially lower the lab's safety risks. We are now in the process of working out alternate off-site arrangements for carrying out the programmatic work that will now no longer be done in our hot cells.

■ **"Nuclear Facilities."** According to DOE regulations, locations that have more than a certain well-defined threshold amount of radioactive materials must be regarded as "nuclear facilities." Argonne has a substantial number of such "facilities," mostly due to nuclear materials that are the

remnants of our extensive nuclear reactor work of more than a decade ago. I have directed that all such materials be transported (in an appropriately safe manner) to the Alpha-Gamma Hot Cells; thus, while the hot cells will no longer be used for programmatic work, they will be used as a very safe interim storage location until we can get these nuclear materials off site. Once the lab has removed all such materials, these hot cells can then be fully shut down.

The past week has seen a real surge in activities related to these organizational changes, and I was very pleased to see the "can-do," cooperative attitudes displayed by all concerned. Argonne is at its best when we come together with a common purpose, and I think all of us would like nothing better than for Argonne to become "best in class" for safety — nuclear or other — within the DOE labs system. This is an achievable goal — so let's do it!