

Caution Bulletin

Missed Forklift Inspection Causes Nuclear Safety Noncompliance

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Tracking No: 749

Summary: In November 2007, a noncompliance with a facility Technical Safety Requirement (TSR) hazard control occurred when a forklift, which had exceeded its annual preventative maintenance (PM) inspection due date, was used to move waste containers. The supervisor providing oversight of the task had a misunderstanding that a grace period applied to the annual inspection. All personnel must be cognizant of when and if grace periods can be applied to specific activities. Grace periods are allowed for TSR surveillance inspections of safety significant equipment, but are not applicable to equipment inspections controlled by other requirements.

Discussion of Activities: The Solid Waste Operations Complex (SWOC) TSR contain an Administrative Control Element related to Hoisting and Rigging which requires that equipment pre-use inspections shall be performed and equipment shall be verified as operational prior to use. On two forklifts, the Class A annual PM inspection was due in October. The forklifts were used in November after the PM had expired, causing a noncompliance with a hazard control.

Analysis: Vehicle Maintenance uses an informal recall service to notify forklift custodians of upcoming service dates. No actions are taken if a facility does not respond to a recall notice. Facility maintenance relied on the vehicle maintenance recall system and daily inspections to ensure compliance with the TSR requirement. At one time, forklifts were subject to duplicate tracking in the Job Control System; however, a decision was made to remove the equipment from this system due to confusion caused by using two tracking systems.

A Field Work Supervisor (FWS) directed an operator to use the forklift after the date on the annual inspection PM tag had passed. The FWS was accustomed to grace periods for safety basis-related equipment. A quarterly lubrication PM does not require equipment to be taken out of service if exceeded; however, annual service inspections require that if the PM is not completed within the month it is due, the equipment must be taken out of service.

Grace periods are allowed for TSR surveillance inspection and maintenance of safety significant equipment, but are not applicable to forklift inspections. Information obtained after the event determined that FWS personnel consistently recognized that if an equipment tag had passed its due date, the equipment should be taken out of service. However, the FWS were consistently uncertain about the applicability of a grace period.

Recommended Actions:

- Develop a structured approach to tracking Hoisting and Rigging, as well as other equipment (including rental), inspections which impact the facility safety basis.
- Ensure personnel understand when and if grace periods can be applied to specific activities.

Cost Savings/Avoidance: Not Evaluated

Work Function: Conduct of Operations - General

Hazards: NA

Keywords: NA

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References: EM-RL--PHMC-SOLIDWASTE-2007-0005