



**Department of Energy**  
Richland Operations Office  
P.O. Box 550  
Richland, Washington 99352

November 6, 2018

CERTIFIED MAIL

Mr. Tom Carpenter  
Hanford Challenge  
2719 East Madison Street  
Suite 304  
Seattle, Washington 98112

Dear Mr. Carpenter:

FREEDOM OF INFORMATION ACT REQUEST (FOI 2018-01629)

This letter is in further response to the electronic Freedom of Information Act (FOIA) request you submitted to this office requesting copies of Problem Evaluation Requests (PER), excluding surrounding records, from January 1 2018, to the date of your request.

In a telephone conversation with me on September 28, 2018, you narrowed the scope of your request to a database listing of the PERs that includes the date initiated, number, title and description.

The 823-page listing is enclosed with deletions of names, personal cell phone numbers, certain job titles, and any other personal information regarding other individuals, pursuant to Exemption 6 of the FOIA. Specifically, information has been deleted from the listing when the information is "unique and specific" to certain subjects, allowing individual identities to possibly become apparent from the specific details set forth in the documents.

Exemption 6 provides that an agency may protect from disclosure all personal information if its disclosure would constitute a clearly unwarranted invasion of privacy by subjecting the third-party individuals to unwanted communications, harassment, intimidation, retaliation, or other substantial privacy invasions by interested parties.

In invoking Exemption 6 we considered 1) whether a significant privacy interest would be invaded by disclosure of information, 2) whether release of the information would further the public interest by shedding light on the operations or activities of the government, and 3) whether disclosure would constitute a clearly unwarranted invasion of private or public interest. The U.S. Department of Energy (DOE) has determined that the public interest in the identity and personal information of the individuals whose information appears in the documents does not outweigh the individuals' privacy interests.

All releasable information in these documents has been segregated and is being provided to you. The undersigned individual is responsible for this determination. You have the right to appeal to the Office of Hearings and Appeals, as provided in 10 CFR 1004.8, for this determination. Should you choose to exercise this right, your appeal must be filed within 90 days after receipt of this letter. You may submit your appeal by email to [OHA.filings@hq.doe.gov](mailto:OHA.filings@hq.doe.gov), including the phrase "Freedom of Information Appeal" in the subject line (this is the method preferred by the Office of Hearing and Appeals). Alternatively, any such appeal may be made in writing to the following address: Director, Office of Hearings and Appeals (HG-1), U.S. Department of Energy, L'Enfant Plaza Building, 1000 Independence Avenue SW, Washington, D.C. 20585-1615. The appeal must contain all the elements required by 10 C.F.R. § 1004.8, including a copy of the determination letter. Should you choose to appeal, please provide my office with a copy of your appeal. Thereafter, judicial review will be available to you in the Federal District Court either (1) in the district where you reside, (2) where you have your principal place of business, (3) where DOE's records are situated, or (4) in the District of Columbia.

You may contact the DOE Richland Operations Office FOIA Public Liaison, Richard Buel, at (509) 376-3375, or by mail at P.O. Box 550, Richland, Washington, 99352 for any further assistance or to discuss any aspect of your request. Additionally, you may contact the Office of Government Information Services (OGIS) at the National Archives and Records Administration to inquire about the FOIA mediation services they offer. The contact information for OGIS is as follows: Office of Government Information Services, National Archives and Records Administration, 8601 Adelphi Road-OGIS, College Park, Maryland 20740-6001, email at [ogis@nara.gov](mailto:ogis@nara.gov); telephone at (202) 741-5770; toll free at 1-877-684-6448; or facsimile at (202) 741-5769.

If you have any questions regarding this matter, please contact me at our address or at (509) 376-6288.

Sincerely,

-Original Signed By-

Dorothy Riehle  
Freedom of Information Act Officer  
Office of Communications  
and External Affairs

OCE:DCR

Enclosure

Date Initiated	PER Number	Per Title	Problem Description
1/1/2018	WRPS-PER-2018-0001	AY/AZ Tank Farms LDP missed readings	Per OSD-T-151-00007, and RPP-PLAN-60074, a weekly level is required for the AY-102 leak detection pit. This was scheduled per WO 352049 using AY102-WSTA-WFIT-122. However the reading was not obtained due to the holiday and inclement weather. This PER is written as part of the recovery action stipulated in OSD-T-151-00007.
1/2/2018	WRPS-PER-2018-0002	Failure to obtain a required level reading for AY/AZ Leak Detection Pits.	Failure to obtain a required level reading for AY/AZ Leak Detection Pits.

1/2/2018	WRPS-PER-2017-2851	An Approved Operator Aid Should be Developed to be Used as a Quick Reference Guide for Operating limits/Specifications for IH	<p><b>Title: BACKSHIFT: Observed AX-102 Pump Removal</b></p> <p><b>Summary:</b> The Retrieval and Closure FRs observed the AX-02A pump pull (WO 260740) on 12/8/2017. The pump pull was delayed in getting started due to the cold temperatures and the FR inquiring about the cold temperature limits of the IHT and HPT monitoring equipment. Review of the operating manual temperature limits for the XRS000 personal sample pump revealed that it has a low temperature operating limit of 32 degrees Fahrenheit. At the time of pre-job the outside temperature was around 29 degrees Fahrenheit and would not be expected to reach 32 degrees until around 1pm that afternoon. The Construction Manager indicated he spoke with a manager within the Retrieval and Closure organization and that a workaround for using the XRS000 sample pumps in cold weather is to place Hot Hands hand warmer packs around the instrument to increase the temperature. WRPS was unable to provide the FR with documentation that this cold weather compensatory measure is approved by the vendor (OFI, 16265). Also, it appears that this would qualify as a Field Deviation to a Monitoring/Sampling Plan and as such should be documented on Form A-6004-451, the Industrial Hygiene Field Deviation Form according to procedure TFC-ESHQ-5_IH-C-46 Industrial Hygiene Reporting and Records Management. This documentation was not provided to capture the field deviation from the sample plan. Furthermore, if this practice is to be utilized throughout the cold weather season I should be formally incorporated in TF-OPS-IHT-009 "Industrial Hygiene Pump Preparation and Field Use for Conducting Personal/Area Air Sampling" (Finding 16262).</p> <p>On 12/12/2017 WRPS Retrieval Health and Safety manager provided an email chain that shows the issue of operating the XRS000 outside of manufacturer recommended relative humidity ranges was brought up and evaluated in December 2012 (WRPS-PER-2012-2063). As a corrective action, TF-OPS-IHT-009 was amended to include Attachment 10 "Considerations for High Relative Humidity". A review of the attachment provides precautions that should be taken when equipment covered by TF-OPS-IHT-009 is going to be operated outside of recommended relative humidity ranges provided by the vendor. However, this attachment does not provide information regarding precautions to take when operating equipment outside of vendor recommended temperature ranges which was the FRs concern the day of the pump pull on 12/8/2017. The email chain does include an email dated Jan 4 2016 from (b)(6) that states, "Cold is generally not a giant issue for the pump itself, until sufficient cold affects the lubricants. The battery performance drops rapidly at cold temperatures. Regarding the specifications published in the SKC manual, discussion with SKC indicates that the limits are generally warranty related, not absolute limits of operations". If this statement is to be interpreted as allowance to operate the XRS000 outside of vendor recommended temperature limits then it should be formalized and incorporated into TF-OPS-IHT-009.</p> <p>RPP-RPT-54432 Industrial Hygiene Root Cause Analysis Report for WRPS-PER-2012-2063, issued on 3/18/2013, identified, "The IH organization relies heavily on informally documented expert determinations. The heavy reliance on informal white papers and email are elements of this process. This allows a nimble organization to respond quickly to emergent issues but carries an inherent vulnerability in terms of providing documented basis for actions affecting the program and achieving a sustainable resolution of issues". This statement is in line with the FRs recommendation for formal documentation of the allowance to operate the XRS000 in temperature ranges beyond what is recommended by the manufacturer, rather than rely on the email chain that was provided.</p> <p>The IHT reviewed sample plan IHSP-RETR-AX-45 during the pre-job brief. This sample plan includes a bullet in the last page that states: "Sample plan may be modified per written or verbal direction from the project IH". There is an opportunity to clarify this language to include the requirement that the sample plan may be modified per written or verbal direction from the project IH and that the deviation should be captured in form A-6004-451 to ensure compliance with TFC-ESHQ-5_IH-C-46 (OFI,16264).</p> <p>(b)(6) and (b)(6) proceeded with the job based on approvals received from higher level retrieval and closure managers, however the temperature recorded by the Hanford weather station at 12:30PM was 30.8 degrees Fahrenheit which is below the vendor approved low temp operating range for the XRS000. By this time the job was mostly complete and the pump had already been pulled and placed into the shield box.</p>
1/2/2018	WRPS-PER-2017-2850	Adherence to Instrumentation Specifications	<p><b>Title: BACKSHIFT: Observed AX-102 Pump Removal</b></p> <p><b>Summary:</b> The Retrieval and Closure FRs observed the AX-02A pump pull (WO 260740) on 12/8/2017. The pump pull was delayed in getting started due to the cold temperatures and the FR inquiring about the cold temperature limits of the IHT and HPT monitoring equipment. Review of the operating manual temperature limits for the XRS000 personal sample pump revealed that it has a low temperature operating limit of 32 degrees Fahrenheit. At the time of pre-job the outside temperature was around 29 degrees Fahrenheit and would not be expected to reach 32 degrees until around 1pm that afternoon. The Construction Manager indicated he spoke with a manager within the Retrieval and Closure organization and that a workaround for using the XRS000 sample pumps in cold weather is to place Hot Hands hand warmer packs around the instrument to increase the temperature. WRPS was unable to provide the FR with documentation that this cold weather compensatory measure is approved by the vendor (OFI, 16265). Also, it appears that this would qualify as a Field Deviation to a Monitoring/Sampling Plan and as such should be documented on Form A-6004-451, the Industrial Hygiene Field Deviation Form according to procedure TFC-ESHQ-5_IH-C-46 Industrial Hygiene Reporting and Records Management. This documentation was not provided to capture the field deviation from the sample plan. Furthermore, if this practice is to be utilized throughout the cold weather season I should be formally incorporated in TF-OPS-IHT-009 "Industrial Hygiene Pump Preparation and Field Use for Conducting Personal/Area Air Sampling" (Finding 16262).</p> <p>On 12/12/2017 WRPS Retrieval Health and Safety manager provided an email chain that shows the issue of operating the XRS000 outside of manufacturer recommended relative humidity ranges was brought up and evaluated in December 2012 (WRPS-PER-2012-2063). As a corrective action, TF-OPS-IHT-009 was amended to include Attachment 10 "Considerations for High Relative Humidity". A review of the attachment provides precautions that should be taken when equipment covered by TF-OPS-IHT-009 is going to be operated outside of recommended relative humidity ranges provided by the vendor. However, this attachment does not provide information regarding precautions to take when operating equipment outside of vendor recommended temperature ranges which was the FRs concern the day of the pump pull on 12/8/2017. The email chain does include an email dated Jan 4 2016 from (b)(6) that states, "Cold is generally not a giant issue for the pump itself, until sufficient cold affects the lubricants. The battery performance drops rapidly at cold temperatures. Regarding the specifications published in the SKC manual, discussion with SKC indicates that the limits are generally warranty related, not absolute limits of operations". If this statement is to be interpreted as allowance to operate the XRS000 outside of vendor recommended temperature limits then it should be formalized and incorporated into TF-OPS-IHT-009. RPP-RPT-54432 Industrial Hygiene Root Cause Analysis Report for WRPS-PER-2012-2063, issued on 3/18/2013, identified, "The IH organization relies heavily on informally documented expert determinations. The heavy reliance on informal white papers and email are elements of this process. This allows a nimble organization to respond quickly to emergent issues but carries an inherent vulnerability in terms of providing documented basis for actions affecting the program and achieving a sustainable resolution of issues". This statement is in line with the FRs recommendation for formal documentation of the allowance to operate the XRS000 in temperature ranges beyond what is recommended by the manufacturer, rather than rely on the email chain that was provided.</p> <p>The IHT reviewed sample plan IHSP-RETR-AX-45 during the pre-job brief. This sample plan includes a bullet in the last page that states: "Sample plan may be modified per written or verbal direction from the project IH". There is an opportunity to clarify this language to include the requirement that the sample plan may be modified per written or verbal direction from the project IH and that the deviation should be captured in form A-6004-451 to ensure compliance with TFC-ESHQ-5_IH-C-46 (OFI,16264).</p> <p>The FWS and construction manager proceeded with the job based on approvals received from higher level retrieval and closure managers, however the temperature recorded by the Hanford weather station at 12:30PM was 30.8 degrees Fahrenheit which is below the vendor approved low temp operating range for the XRS000. By this time the job was mostly complete and the pump had already been pulled and placed into the shield box.</p>
1/2/2018	WRPS-PER-2017-2864	No notification was made to the on-call Facility Representative concerning valve found out of position at ETF	<p><b>Title: Investigated Valve Out of Position Found at ETF</b></p> <p><b>Summary:</b> On December 7th, ETF investigated the cause of reduced pumping capacity of the leachate pump installed at LERF basin 43. For over a week the pump was not pumping at or near the designed flow rate. During the investigation it was found that valve HV-43-26, a needle valve in the discharge path of the pump, was partially closed, restricting flow. The FR became aware of the valve out of position during shift turnover when the oncoming shift operations manager mentioned it during the daily brief. The FR began identifying issues which may have resulted in or from the valve out of position. The attached findings were identified as a result.</p> <p><b>Issue Type:</b> Finding (Level 3) <b>Significance Level:</b> 1 <b>Statement:</b> 35408-F01 No notification was made to the on-call Facility Representative concerning a valve found out of position at ETF. (Priority Level 3)(Swarens 12/8/2017)</p> <p><b>Discussion:</b> On December 7th, ETF investigated the cause of reduced pumping capacity of the leachate pump installed at LERF basin 43. For over a week the pump was not pumping at or near the designed flow rate. During the investigation it was found that valve HV-43-26, a needle valve in the discharge path of the pump, was partially closed restricting flow. No notification by the Central Shift Manager was made to the On-Call Facility Representative of the discovery of a valve out of position, a significant operational issue, at ETF.</p> <p><b>Requirements:</b> <b>Requirement:</b> TFC-OPS-OPER-C-57, "Event Notification" section 5.0, "Definitions: Significant Operational Issues. This event criteria includes entry into abnormal operating procedures (see exemptions below), emergency response procedures, or equipment issues that impact ongoing operations (see examples below) that may not require notification under other reporting categories but would reach a threshold to notify the responsible level 2 manager (this includes a non-injury violation of lock and tag controls where there are no credible barriers left between the worker and the energy source).</p> <p>REF: TOD Weekly 12-11-17; Finding Level 3; C Swarens; OA35408</p>

1/2/2018	WRPS- PER- 2017- 2865	An event investigation was not initiated when a valve (HV-43-26) was discovered out of position at	<p>Title: Investigated Valve Out of Position Found at ETF</p> <p>Summary: On December 7th, ETF investigated the cause of reduced pumping capacity of the leachate pump installed at LERF basin 43. For over a week the pump was not pumping at or near the designed flow rate. During the investigation it was found that valve HV-43-26, a needle valve in the discharge path of the pump, was partially closed, restricting flow. The FR became aware of the valve out of position during shift turnover when the oncoming shift operations manager mentioned it during the daily brief. The FR began identifying issues which may have resulted in or from the valve out of position. The attached findings were identified as a result.</p> <p>-----</p> <p>Issue Type: Finding (Level 3) Significance Level: 1</p> <p>Statement: 35408-F02 An event investigation was not initiated when a valve (HV-43-26) was discovered out of position at ETF. (Priority Level 3)(Swarens 12/8/2017).</p> <p>Discussion: On December 7th, ETF investigated the cause of reduced pumping capacity of the leachate pump installed at LERF basin 43. For over a week the pump was not pumping at or near the designed flow rate. During the investigation it was found that valve HV-43-26, a needle valve in the discharge path of the pump, was partially closed restricting flow. No event investigation was initiated when the valve was found out of position.</p> <p>Requirements: Requirement: TFC-OPS-OPER-C-14, "Event Investigation Process", Attachment A – "Initial Investigation Determination", Section 1: Examples of specific events, but not limited to, requiring investigation, and criteria for identifying other events or conditions to be investigated as defined in DOE O 422.1 are as follows: (7.1.2) • Discovery of improperly positioned valves, switches, or components that adversely affects operations, safety or system features.</p> <p>REF: TOD Weekly 12-11-17; Finding Level 3; C Swarens; OAS3408</p>
1/2/2018	WRPS- PER- 2017- 2866	No procedure or process initialized system alignment (including leachate pump switch alignment) prior	<p>Title: Investigated Valve Out of Position Found at ETF</p> <p>Summary: On December 7th, ETF investigated the cause of reduced pumping capacity of the leachate pump installed at LERF basin 43. For over a week the pump was not pumping at or near the designed flow rate. During the investigation it was found that valve HV-43-26, a needle valve in the discharge path of the pump, was partially closed, restricting flow. The FR became aware of the valve out of position during shift turnover when the oncoming shift operations manager mentioned it during the daily brief. The FR began identifying issues which may have resulted in or from the valve out of position. The attached findings were identified as a result.</p> <p>-----</p> <p>Issue Type: Finding (Level 3) Significance Level: 1</p> <p>Statement: 35408-F03 No procedure or process initialized system alignment (including leachate pump switch alignment) prior to use of the leachate pumping system prior to operation or during operation. (Priority Level 3)(Swarens 12/8/2017).</p> <p>Discussion: Following the discovery of a valve out of position at ETF, no procedure or line-up was identified that positioned the valve and other system components for start-up. Further no procedures or other documents were identified that allowed operation of the valve.</p>
1/2/2018	WRPS- PER- 2017- 2867	ETF-60M-002 section 5.6 found that the controller referenced in the procedure did not match the label of the controller	<p>Title: Investigated Valve Out of Position Found at ETF</p> <p>Summary: On December 7th, ETF investigated the cause of reduced pumping capacity of the leachate pump installed at LERF basin 43. For over a week the pump was not pumping at or near the designed flow rate. During the investigation it was found that valve HV-43-26, a needle valve in the discharge path of the pump, was partially closed, restricting flow. The FR became aware of the valve out of position during shift turnover when the oncoming shift operations manager mentioned it during the daily brief. The FR began identifying issues which may have resulted in or from the valve out of position. The attached findings were identified as a result.</p> <p>-----</p> <p>Issue Type: Finding (Level 3) Significance Level: 1</p> <p>Statement: 35408-F04 Procedure ETF-60M-002 section 5.6 "Manual operation of Leachate Pumps" indicates operation of handswitch P-4X-4 (HS_P4X_4_3) when the controller for leachate pumps is labeled P-4X. (Priority Level 3) (Swarens 12/8/2017).</p> <p>Discussion: Review of procedure ETF-60M-002 section 5.6 "Manual operation of Leachate Pumps" and associated equipment found that the controller referenced in the procedure did not match the label of the controller. The procedure indicates operation of handswitch P-4X-4 (HS_P4X_4_3) when the controller for the leachate pumps is labeled P-4X.</p>

1/2/2018	WRPS- PER- 2017- 2868	ETF-60M-002 section 5.6 indicates that the handswitch be placed in the "OFF" position following manual leachate pumping oper	<p>Title: Investigated Valve Out of Position Found at ETF</p> <p>Summary: On December 7th, ETF investigated the cause of reduced pumping capacity of the leachate pump installed at LERF basin 43. For over a week the pump was not pumping at or near the designed flow rate. During the investigation it was found that valve HV-43-26, a needle valve in the discharge path of the pump, was partially closed, restricting flow. The FR became aware of the valve out of position during shift turnover when the oncoming shift operations manager mentioned it during the daily brief. The FR began identifying issues which may have resulted in or from the valve out of position. The attached findings were identified as a result.</p> <p>-----</p> <p>Issue Type: Finding (Level 3) Significance Level: 1</p> <p>Statement: 35408-F05 Procedure ETF-60M-002 section 5.6 "Manual operation of Leachate Pumps" returns the operating switch to "OFF", no procedure or process returns the switch to the "AUTO" position. Automatic operation is the normal mode. (Priority Level 3)(Swarens 12/8/2017).</p> <p>Discussion: Procedure ETF-60M-002 section 5.6 "Manual operation of Leachate Pumps" indicates that the handswitch be placed in the "OFF" position following manual leachate pumping operations. No mention is made to return the switch to "AUTO" following manual operation. Automatic operation is the designed normal mode of operation.</p> <p>Requirements: Requirement: DOE O 422.1, "Conduct of Operations" Attachment 2 Paragraph 2.p, "technical Procedures" 2.p.(3) Procedure content, including consistent format and use of terms (e.g. prerequisites, warnings, cautions, notes,hold points, etc.), detail sufficient for accomplishing the operation, technically accurate procedures capable of performance as written, and procedure conformance with the facility design and manufacturer documentation r. Procedures specify the restoration or shutdown steps for equipment following tests or other operations.</p> <p>REF: TOD Weekly 12-11-17; Finding Level 3; C Swarens; OA35408</p>
1/2/2018	WRPS- PER- 2017- 2870	ETF-60M-002 section 5.6 found that the handswitch referenced in the procedure did not have labeling.	<p>Title: Investigated Valve Out of Position Found at ETF</p> <p>Summary: On December 7th, ETF investigated the cause of reduced pumping capacity of the leachate pump installed at LERF basin 43. For over a week the pump was not pumping at or near the designed flow rate. During the investigation it was found that valve HV-43-26, a needle valve in the discharge path of the pump, was partially closed, restricting flow. The FR became aware of the valve out of position during shift turnover when the oncoming shift operations manager mentioned it during the daily brief. The FR began identifying issues which may have resulted in or from the valve out of position. The attached findings were identified as a result.</p> <p>-----</p> <p>Issue Type: Finding (Level 3) Significance Level: 1</p> <p>Statement: 35408-F06 Handswitches for the leachate pumps at LERF basins are not labeled. (Priority Level 3)(Swarens 12/8/2017).</p> <p>Discussion: Review of procedure ETF-60M-002 section 5.6 "Manual operation of Leachate Pumps" and associated equipment found that the handswitch referenced in the procedure did not have labeling. The procedure indicates operation of handswitch P-4X-4 (HS_P4X_4_3). No such labeling exists on the handswitch.</p> <p>Requirements: Requirement: DOE O 422.1, "Conduct of Operations" Attachment 2 Paragraph 2.r, "Component Labeling" The operator must establish and implement operations practices for clear, accurate equipment labeling, addressing the following elements: 2.r.(1) Components that require a label. a. Directives contain provisions for component labeling, including identification of components and standardized</p>
1/2/2018	WRPS- PER- 2017- 2871	ETF's Outside Operator Rounds incorrectly identifies the position of the "leachate pump motor starter mode switch"	<p>Title: Investigated Valve Out of Position Found at ETF</p> <p>Summary: On December 7th, ETF investigated the cause of reduced pumping capacity of the leachate pump installed at LERF basin 43. For over a week the pump was not pumping at or near the designed flow rate. During the investigation it was found that valve HV-43-26, a needle valve in the discharge path of the pump, was partially closed, restricting flow. The FR became aware of the valve out of position during shift turnover when the oncoming shift operations manager mentioned it during the daily brief. The FR began identifying issues which may have resulted in or from the valve out of position. The attached findings were identified as a result.</p> <p>-----</p> <p>Issue Type: Finding (Level 3) Significance Level: 1</p> <p>Statement: 35408-F07 ETF's Outside Operator Rounds incorrectly identifies the position of the "leachate pump motor starter mode switch" as "MAN/AUTO" while the switch is labeled "HAND/OFF/AUTO". (Priority Level 3)(Swarens 2/8/2017).</p> <p>Discussion: Review of Outside Operator Rounds found that the sheet identifies the position of the "leachate pump motor starter mode switch" as "MAN/AUTO". The switch is labeled "HAND/OFF/AUTO". The switches are usually in the "OFF" position due to inoperable level probes in the leachate system causing continuous operation in "AUTO" (see RATL 08-0T-018).</p> <p>Requirements: Requirement: DOE O 422.1, "Conduct of Operations" Attachment 2 Paragraph 2.p, "technical Procedures" 2.p.(3) procedure content, including consistent format and use of terms (e.g. prerequisites, warnings, cautions, notes, hold points, etc.), detail sufficient for accomplishing the operation, technically accurate procedures capable of performance as written, and procedure conformance with the facility design and manufacturer documentation o. Procedures reflect human factors considerations such as procedure callouts exactly matching equipment labels, units in procedures match instrument markings, charts and graphs easily read, and important steps or information highlighted.</p> <p>REF: TOD Weekly 12-11-17; Finding Level 3; C Swarens; OA 35408</p>

1/2/2018	WRPS- PER- 2017- 2872	Outside Operator Rounds incorrectly indicate a note instead of the position of the "leachate pump motor starter mode switch"	<p><b>Title:</b> Investigated Valve Out of Position Found at ETF</p> <p><b>Summary:</b> On December 7th, ETF investigated the cause of reduced pumping capacity of the leachate pump installed at LERF basin 43. For over a week the pump was not pumping at or near the designed flow rate. During the investigation it was found that valve HV-43-26, a needle valve in the discharge path of the pump, was partially closed, restricting flow. The FR became aware of the valve out of position during shift turnover when the oncoming shift operations manager mentioned it during the daily brief. The FR began identifying issues which may have resulted in or from the valve out of position. The attached findings were identified as a result.</p> <p>-----</p> <p><b>Issue Type:</b> Finding (Level 3) <b>Significance Level:</b> 1</p> <p><b>Statement:</b> 35408-F08 Outside Operator Rounds from 11/27/17 incorrectly indicate a note instead of the position of the "leachate pump motor starter mode switch" which reads "Basin 42 to 43 transfer in progress". (Priority Level 3) (Swarens 12/8/2017).</p> <p><b>Discussion:</b> Reviewed and accepted Outside Operator Rounds from 11/27/2017 improperly indicate a note that read "Basin 42 to 43 transfer in progress" in the space for the position of the "leachate pump motor starter mode switch" which indicates positions as "MAN/AUTO". The note has no bearing on the operation of the leachate system and is not the position of the valve. This discrepancy was not corrected by (b)(6)</p> <p><b>Requirements:</b> Requirement: DOE O 422.1, "Conduct of Operations" Attachment 2 Paragraph 2.b "Shift Routines and Operating Practices" 2.b. The operator must establish and implement operations practices to ensure shift operators are alert, informed of conditions, and properly operate equipment, addressing the following elements: 2.b.(4) Procedures for completing round sheets or inspection logs, responding to abnormal conditions, and periodic supervisory reviews of round sheets or inspection logs.</p>
1/2/2018	WRPS- PER- 2017- 2874	Rounds from 11/27/2017 improperly indicate dates of 12/3/2017 when the rounds were completed, reviewed, and signed on 11/27/2	<p><b>Title:</b> Investigated Valve Out of Position Found at ETF</p> <p><b>Summary:</b> On December 7th, ETF investigated the cause of reduced pumping capacity of the leachate pump installed at LERF basin 43. For over a week the pump was not pumping at or near the designed flow rate. During the investigation it was found that valve HV-43-26, a needle valve in the discharge path of the pump, was partially closed, restricting flow. The FR became aware of the valve out of position during shift turnover when the oncoming shift operations manager mentioned it during the daily brief. The FR began identifying issues which may have resulted in or from the valve out of position. The attached findings were identified as a result.</p> <p>-----</p> <p><b>Issue Type:</b> Finding (Level 3) <b>Significance Level:</b> 1</p> <p><b>Statement:</b> 35408-F09 Outside Operator Rounds for the week of 11/27 to 12/3 are dated incorrectly. (Some read WE 11-27-17, while others are dated WE 12-3-17, and all signatures for performed by and reviewed by signed with the date 11/27/17). (Priority Level 3)(Swarens 12/8/2017).</p> <p><b>Discussion:</b> Reviewed and accepted Outside Operator Rounds from 11/27/2017 improperly indicate dates of 12/3/2017 when the rounds were completed, reviewed, and signed on 11/27/2017. This discrepancy was not corrected by (b)(6)</p> <p><b>Requirements:</b> Requirement: DOE O 422.1, "Conduct of Operations" Attachment 2 Paragraph 2.b "Shift Routines and Operating Practices" 2.b. The operator must establish and implement operations practices to ensure shift operators are alert, informed of conditions, and properly operate equipment, addressing the following elements: 2.b.(4) Procedures for completing round sheets or inspection logs, responding to abnormal conditions, and periodic supervisory reviews of round sheets or inspection logs. h. Supervisors review round sheets for trends, abnormalities, and proper data and narrative entries during each shift.</p> <p>REF: TOD Weekly 12-11-17; Finding Level 3; C Swarens; OA35408</p>
1/2/2018	WRPS- PER- 2017- 2875	Changes have not been made to Rounds to reflect the fact that automatic	<p><b>Title:</b> Investigated Valve Out of Position Found at ETF</p> <p><b>Summary:</b> On December 7th, ETF investigated the cause of reduced pumping capacity of the leachate pump installed at LERF basin 43. For over a week the pump was not pumping at or near the designed flow rate. During the investigation it was found that valve HV-43-26, a needle valve in the discharge path of the pump, was partially closed, restricting flow. The FR became aware of the valve out of position during shift turnover when the oncoming shift operations manager mentioned it during the daily brief. The FR began identifying issues which may have resulted in or from the valve out of position. The attached findings were identified as a result.</p> <p>-----</p> <p><b>Issue Type:</b> Finding (Level 3) <b>Significance Level:</b> 1</p> <p><b>Statement:</b> 35408-F10 Changes have not been made to the Outside Operator Rounds to reflect the fact that automatic control of the leachate pumps has been inoperable since August of 2008. (Priority Level 3)(Swarens 12/8/2017).</p> <p><b>Discussion:</b> The leachate pumps for all three LERF basins have been inoperable in the AUTO mode since at least August of 2008. Despite this, Outside Operator Rounds have not been updated to include the "OFF" position as a possible position of the "leachate pump motor starter mode switch". Due to the inoperable auto mode, the usual position of this switch is "OFF".</p> <p><b>Requirements:</b> Requirement: DOE O 422.1, "Conduct of Operations" Attachment 2 Paragraph 2.b "Shift Routines and Operating Practices" 2.b. The operator must establish and implement operations practices to ensure shift operators are alert, informed of conditions, and properly operate equipment, addressing the following elements: 2.b.(4) Procedures for completing round sheets or inspection logs, responding to abnormal conditions, and periodic supervisory reviews of round sheets or inspection logs.</p>

1/2/2018	WRPS-PER-2017-2882	ETF has not issued standing orders to prohibit the use of the automatic function of the leachate pumps when the automatic function was deemed inoperable.	<p><b>Title:</b> Investigated Valve Out of Position Found at ETF</p> <p><b>Summary:</b> On December 7th, ETF investigated the cause of reduced pumping capacity of the leachate pump installed at LERF basin 43. For over a week the pump was not pumping at or near the designed flow rate. During the investigation it was found that valve HV-43-26, a needle valve in the discharge path of the pump, was partially closed, restricting flow. The FR became aware of the valve out of position during shift turnover when the oncoming shift operations manager mentioned it during the daily brief. The FR began identifying issues which may have resulted in or from the valve out of position. The attached findings were identified as a result.</p> <p><b>Issue Type:</b> Finding (Level 3) <b>Significance Level:</b> 1</p> <p><b>Statement:</b> 35408-F11 ETF has not issued standing orders to prohibit the use of the automatic function of the leachate pumps when the automatic function was deemed inoperable. (Priority Level 3)(Swarens 12/8/2017).</p> <p><b>Discussion:</b> The leachate pumps for all three LERF basins have been inoperable in the AUTO mode since at least August of 2008. Despite this, no standing orders have been issued by ETF to prohibit the use of the automatic function.</p> <p><b>Requirements:</b> <b>Requirement:</b> TFC-OPS-OPER-C-40, "Timely Instructions/Orders" 1.0 Purpose and Scope: The types of information distributed through these processes may include special operations, administrative directions, special data collection campaigns, notification of expected visitors, direction to perform special evolutions or tests, limitations on performing certain operations, compensatory measures, notification of critical procedure revisions, work priorities, new Technical Safety Requirements (TSR) Red Arrows (excluding LCO/LCO time monitoring), or other specific direction that affects field operations. (7.1.1 a).</p> <p>REF: TOD Weekly 12-11-17; Finding Level 3; C Swarens; OA35408</p>
1/2/2018	WRPS-PER-2017-2883	ETF has not installed out of service tags (or equivalent tags to caution tags) at the leachate pump	<p><b>Title:</b> Investigated Valve Out of Position Found at ETF</p> <p><b>Summary:</b> On December 7th, ETF investigated the cause of reduced pumping capacity of the leachate pump installed at LERF basin 43. For over a week the pump was not pumping at or near the designed flow rate. During the investigation it was found that valve HV-43-26, a needle valve in the discharge path of the pump, was partially closed, restricting flow. The FR became aware of the valve out of position during shift turnover when the oncoming shift operations manager mentioned it during the daily brief. The FR began identifying issues which may have resulted in or from the valve out of position. The attached findings were identified as a result.</p> <p><b>Issue Type:</b> Finding (Level 3) <b>Significance Level:</b> 1</p> <p><b>Statement:</b> 35408-F12 ETF has not installed out of service tags (or equivalent tags to caution tags) at the leachate pump controllers to indicate the automatic function is not to be used. (Priority Level 3)(Swarens 12/8/2017).</p> <p><b>Discussion:</b> The leachate pumps for all three LERF basins have been inoperable in the AUTO mode since at least August of 2008. Use of the pumps in "AUTO" result in the pumps not securing when the low level is reached. Despite this, no caution tags (or equivalent) have been installed by ETF at the pump controllers to prohibit the use of the automatic function for equipment protection or operational control.</p> <p><b>Requirements:</b> <b>Requirement:</b> DOE O 422.1, "Conduct of Operations" Attachment 2 Paragraph 2.1 "Lockouts and Tagouts" 2.1(2) The operator must establish and implement operations practices that address the following elements for the installation and removal of caution tags for equipment protection or operational control.</p> <p>REF: TOD Weekly 12-11-17; Finding Level 3; C Swarens; OA35408</p>
1/2/2018	WRPS-PER-2017-2863	IH Sample Plans Should Reference TFC-ESHQ-5_IH-C-46 to Ensure that Any Modification Made to a Sample Plan are Recorded in Co	<p><b>Title:</b> BACKSHIFT: Observed AX-102 Pump Removal</p> <p><b>Summary:</b> The Retrieval and Closure FRs observed the AX-02A pump pull (WO 260740) on 12/8/2017. The pump pull was delayed in getting started due to the cold temperatures and the FR inquiring about the cold temperature limits of the IHT and HPT monitoring equipment. Review of the operating manual temperature limits for the XRS000 personal sample pump revealed that it has a low temperature operating limit of 32 degrees Fahrenheit. At the time of pre-job the outside temperature was around 29 degrees Fahrenheit and would not be expected to reach 32 degrees until around 1pm that afternoon. The Construction Manager indicated he spoke with a manager within the Retrieval and Closure organization and that a workaround for using the XRS000 sample pumps in cold weather is to place Hot Hands hand warmer packs around the instrument to increase the temperature. WRPS was unable to provide the FR with documentation that this cold weather compensatory measure is approved by the vendor (OFI, 16265). Also, it appears that this would qualify as a Field Deviation to a Monitoring/Sampling Plan and as such should be documented on Form A-6004-451, the Industrial Hygiene Field Deviation Form according to procedure TFC-ESHQ-5_IH-C-46 Industrial Hygiene Reporting and Records Management. This documentation was not provided to capture the field deviation from the sample plan. Furthermore, if this practice is to be utilized throughout the cold weather season it should be formally incorporated in TF-OPS-IHT-009 "Industrial Hygiene Pump Preparation and Field Use for Conducting Personal/Area Air Sampling" (Finding 16262).</p> <p>On 12/12/2017 WRPS Retrieval Health and Safety manager provided an email chain that shows the issue of operating the XRS000 outside of manufacturer recommended relative humidity ranges was brought up and evaluated in December 2012 (WRPS-PER-2012-2063). As a corrective action, TF-OPS-IHT-009 was amended to include Attachment 10 "Considerations for High Relative Humidity". A review of the attachment provides precautions that should be taken when equipment covered by TF-OPS-IHT-009 is going to be operated outside of recommended relative humidity ranges provided by the vendor. However, this attachment does not provide information regarding precautions to take when operating equipment outside of vendor recommended temperature ranges which was the FRs concern the day of the pump pull on 12/8/2017. The email chain does include an email dated Jan 4 2016 from (b)(6) that states, "Cold is generally not a giant issue for the pump itself, until sufficient cold affects the lubricants. The battery performance drops rapidly at cold temperatures. Regarding the specifications published in the SKC manual, discussion with SKC indicates that the limits are generally warranty related, not absolute limits of operations". If this statement is to be interpreted as allowance to operate the XRS000 outside of vendor recommended temperature limits then it should be formalized and incorporated into TF-OPS-IHT-009.</p> <p>RPP-RPT-54432 Industrial Hygiene Root Cause Analysis Report for WRPS-PER-2012-2063, issued on 3/18/2013, identified, "The IH organization relies heavily on informally documented expert determinations. The heavy reliance on informal white papers and email are elements of this process. This allows a nimble organization to respond quickly to emergent issues but carries an inherent vulnerability in terms of providing documented basis for actions affecting the program and achieving a sustainable resolution of issues". This statement is in line with the FRs recommendation for formal documentation of the allowance to operate the XRS000 in temperature ranges beyond what is recommended by the manufacturer, rather than rely on the email chain that was provided.</p> <p>The IHT reviewed sample plan IHSP-RETR-AX-45 during the pre-job brief. This sample plan includes a bullet in the last page that states: "Sample plan may be modified per written or verbal direction from the project IH". There is an opportunity to clarify this language to include the requirement that the sample plan may be modified per written or verbal direction from the project IH and that the deviation should be captured in form A-6004-451 to ensure compliance with TFC-ESHQ-5_IH-C-46 (OFI,16264).</p> <p>(b)(6) and (b)(6) proceeded with the job based on approvals received from higher level retrieval and closure managers, however the temperature recorded by the Hanford weather station at 12:30PM was 30.8 degrees Fahrenheit which is below the vendor approved low temp operating range for the XRS000. By this time the job was mostly complete and the pump had already been pulled and placed into the shield box.</p>

1/2/2018	WRPS-PER-2017-2862	Cold Weather Contingency should be formally documented and implemented	<p><b>Title: BACKSHIFT: Observed AX-102 Pump Removal</b></p> <p><b>Summary:</b> The Retrieval and Closure FRs observed the AX-02A pump pull (WO 260740) on 12/8/2017. The pump pull was delayed in getting started due to the cold temperatures and the FR inquiring about the cold temperature limits of the IHT and HPT monitoring equipment. Review of the operating manual temperature limits for the XRS000 personal sample pump revealed that it has a low temperature operating limit of 32 degrees Fahrenheit. At the time of pre-job the outside temperature was around 29 degrees Fahrenheit and would not be expected to reach 32 degrees until around 1pm that afternoon. The Construction Manager indicated he spoke with a manager within the Retrieval and Closure organization and that a workaround for using the XRS000 sample pumps in cold weather is to place Hot Hands hand warmer packs around the instrument to increase the temperature. WRPS was unable to provide the FR with documentation that this cold weather compensatory measure is approved by the vendor (OFI, 16265). Also, it appears that this would qualify as a Field Deviation to a Monitoring/Sampling Plan and as such should be documented on Form A-6004-451, the Industrial Hygiene Field Deviation Form according to procedure TFC-ESHQ-5_IH-C-46 Industrial Hygiene Reporting and Records Management. This documentation was not provided to capture the field deviation from the sample plan. Furthermore, if this practice is to be utilized throughout the cold weather season it should be formally incorporated in TF-OPS-IHT-009 "Industrial Hygiene Pump Preparation and Field Use for Conducting Personal/Area Air Sampling" (Finding 16262).</p> <p>On 12/12/2017 WRPS Retrieval Health and Safety manager provided an email chain that shows the issue of operating the XRS000 outside of manufacturer recommended relative humidity ranges was brought up and evaluated in December 2012 (WRPS-PER-2012-2063). As a corrective action, TF-OPS-IHT-009 was amended to include Attachment 10 "Considerations for High Relative Humidity". A review of the attachment provides precautions that should be taken when equipment covered by TF-OPS-IHT-009 is going to be operated outside of recommended relative humidity ranges provided by the vendor. However, this attachment does not provide information regarding precautions to take when operating equipment outside of vendor recommended temperature ranges which was the FRs concern the day of the pump pull on 12/8/2017. The email chain does include an email dated Jan 4 2016 from (b)(6) that states, "Cold is generally not a giant issue for the pump itself, until sufficient cold affects the lubricants. The battery performance drops rapidly at cold temperatures. Regarding the specifications published in the SKC manual, discussion with SKC indicates that the limits are generally warranty related, not absolute limits of operations". If this statement is to be interpreted as allowance to operate the XRS000 outside of vendor recommended temperature limits then it should be formalized and incorporated into TF-OPS-IHT-009.</p> <p>RPP-RPT-54432 Industrial Hygiene Root Cause Analysis Report for WRPS-PER-2012-2063, issued on 3/18/2013, identified, "The IH organization relies heavily on informally documented expert determinations. The heavy reliance on informal white papers and email are elements of this process. This allows a nimble organization to respond quickly to emergent issues but carries an inherent vulnerability in terms of providing documented basis for actions affecting the program and achieving a sustainable resolution of issues". This statement is in line with the FRs recommendation for formal documentation of the allowance to operate the XRS000 in temperature ranges beyond what is recommended by the manufacturer, rather than rely on the email chain that was provided.</p> <p>The IHT reviewed sample plan IHSP-RETR-AX-45 during the pre-job brief. This sample plan includes a bullet in the last page that states: "Sample plan may be modified per written or verbal direction from the project IH". There is an opportunity to clarify this language to include the requirement that the sample plan may be modified per written or verbal direction from the project IH and that the deviation should be captured in form A-6004-451 to ensure compliance with TFC-ESHQ-5_IH-C-46 (OFI,16264).</p> <p>The FWS and construction manager proceeded with the job based on approvals received from higher level retrieval and closure managers, however the temperature recorded by the Hanford weather station at 12:30PM was 30.8 degrees Fahrenheit which is below the vendor approved low temp operating range for the XRS000. By this time the job was mostly complete and the pump had already been pulled and placed into the shield box.</p>
1/2/2018	WRPS-PER-2018-0003	Reinstate the usage of flow meters, during all water usages.	<p>During a review of the WRPS Site Wide Required Reading issued on 12/21/2017, regarding the issuance of a new procedure revision, TO-040-540 Water Surveillance and Usage. It was discovered the new revisions could lead to human performance issues and potential procedural violation(s) with removing the need for a flow meter. Flow meters ensure an accuracy level of water being used within the tank farms. Section 3.3.1 Environmental Compliance requires the maximum of 60 gallons of water be used in a contamination area, since the removal of using a water flow meter, this step could easily be violated. Since there is no Hanford or Tank Farm standard for trucks or trailers utilizing water tanks, the potential to misjudge water levels and usage, increases. If the company shall continue the work practice of not using water meters, the procedure still needs to address the usage of using other sources. In the current data sheets, they provide no direction of what kind of tank, trailer, or carboy to be used, or was used. Step 5.3.4 of the procedure says to record the beginning volume of flush truck water on Data Sheet 1 or 2. This step is not workable, since neither data sheet has a location to put a beginning volume. The data sheets are tailored to use flow meters and not estimating water usage.</p>
1/2/2018	WRPS-PER-2018-0004	ETF failed to initiate an Event Investigation for increased leachate pumping rate	<p><b>Title: Investigated LERF Basin 43 Leachate Levels.</b></p> <p><b>Summary:</b> Beginning November 3rd, 2017 ETF began transferring contents from LERF basin 42 to Basin 43. Basin 43 had been emptied in June of 2017 to allow replacement of the basin cover. Following basin 43 cover replacement, the transfer began to empty basin 42 for cover replacement of basin 42.</p> <p>During the transfer it was discovered the basin 43 leachate collection system was experiencing rising levels, and difficulties in pumping the leachate collection system were encountered due to a valve on the discharge line of the leachate pump being misaligned. During this period the level in the leachate system increased over the RCRA permitted 13 inches, requiring notification of the Washington State Department of Ecology.</p> <p>Soon after exceeding the 13 inch level requirement, the electric level detector was calibrated using an installed dip tube level detector as a reference. The electric level detector was found to be out of calibration, with the dip tube detector indicating a level as high as 44 inches, while the electric indicator read 13.1 inches. The electric detector was re-calibrated and checked the following day only to find the level indicator was again out of tolerance. Several subsequent calibration efforts failed to achieve stable, accurate readings. No event investigation has been initiated for the measuring equipment found out of calibration with the potential to impact operations or safety.</p> <p>Since that time a temporary round sheet has been used to take LERF basin 43 leachate collection system level readings. Levels are taken hourly, and the leachate collection system pumped as required based upon level. No standing order has been issued recognizing the temporary round sheet.</p> <p>Since the transfer from LERF basin 42 to basin 43 began November 3rd, 2017 48,050 gallons have been pumped from the basin 43 leachate collection system, requiring 335 hours of pump operation in a five week period. Prior to the basin 43 cover replacement, the total volume pumped from the leachate collection system was 681 gallon in an eleven month period, requiring a pump run time of 8.5 hours. No event investigation has been initiated for the recorded data that is out-of-specification or shows unexpected trends with potential adverse impact on operations or safety.</p> <p>-----</p> <p>Issue Type: Finding (Level 3) Significance Level: 2 Statement: 35485 - F01 ETF Failed to Initiate an Event Investigation for Leachate Pumping Rate That Has Increased by Over 600 Times Previous Rates. (Priority Level 3) (Swarens, 12/19/2017)</p> <p>Discussion: Since the transfer from LERF basin 42 to basin 43 began November 3rd, 2017 48,050 gallons have been pumped from the basin 43 leachate collection system, requiring 335 hours of pump operation in a five week period. Prior to the basin 43 cover replacement, the total volume pumped from the leachate collection system was 681 gallon in an eleven month period, requiring a pump run time of 8.5 hours.</p>

1/2/2018	WRPS-PER-2018-0005	ETF Has Not Issued a Standing Order for Temporary Rounds Used to Determine Leachate Collection	<p>Title: Investigated LERF Basin 43 Leachate Levels</p> <p>Summary: Beginning November 3rd, 2017 ETF began transferring contents from LERF basin 42 to Basin 43. Basin 43 had been emptied in June of 2017 to allow replacement of the basin cover. Following basin 43 cover replacement, the transfer began to empty basin 42 for cover replacement of basin 42.</p> <p>During the transfer it was discovered the basin 43 leachate collection system was experiencing rising levels, and difficulties in pumping the leachate collection system were encountered due to a valve on the discharge line of the leachate pump being misaligned. During this period the level in the leachate system increased over the RCRA permitted 13 inches, requiring notification of the Washington State Department of Ecology.</p> <p>Soon after exceeding the 13 inch level requirement, the electric level detector was calibrated using an installed dip tube level detector as a reference. The electric level detector was found to be out of calibration, with the dip tube detector indicating a level as high as 44 inches, while the electric indicator read 13.1 inches. The electric detector was re-calibrated and checked the following day only to find the level indicator was again out of tolerance. Several subsequent calibration efforts failed to achieve stable, accurate readings. No event investigation has been initiated for the measuring equipment found out of calibration with the potential to impact operations or safety.</p> <p>Since that time a temporary round sheet has been used to take LERF basin 43 leachate collection system level readings. Levels are taken hourly, and the leachate collection system pumped as required based upon level. No standing order has been issued recognizing the temporary round sheet.</p> <p>Since the transfer from LERF basin 42 to basin 43 began November 3rd, 2017 48,050 gallons have been pumped from the basin 43 leachate collection system, requiring 335 hours of pump operation in a five week period. Prior to the basin 43 cover replacement, the total volume pumped from the leachate collection system was 681 gallon in an eleven month period, requiring a pump run time of 8.5 hours. No event investigation has been initiated for the recorded data that is out-of-specification or shows unexpected trends with potential adverse impact on operations or safety.</p> <p>-----</p> <p>Issue Type: Finding (Level 3) Significance Level: 2 Statement: 35485 - F02 ETF Has Not Issued a Standing Order for Temporary Rounds Used to Determine Leachate Collection System Levels in LERF Basin 43. (Priority Level 3) (Swarens, 12/19/2017)</p> <p>Discussion: Beginning November 3rd, 2017 ETF began transferring contents from LERF basin 42 to Basin 43. Basin 43 had been emptied in June of 2017 to allow replacement of the basin cover. Following basin 43 cover replacement, the transfer began to empty basin 42 for cover replacement of basin 42.</p>
1/2/2018	WRPS-PER-2017-2793	TFC-ENG-DESIGN-C-18, Sections 4.1.4, 4.2.4, 4.3.2, and 4.4.2 are unsatisfactory.	<p>Finding 01: TFC-ENG-DESIGN-C-18, Sections 4.1.4, 4.2.4, 4.3.2, and 4.4.2 are unsatisfactory. The sections point broadly to entire chapters within the QAPD, and do not include the required level of detail. The sections of TFC-ENG-DESIGN-C-18 that point to QAPD Chapters should be reviewed and revised to provide the implementing-level guidance necessary to meet the higher-level QAPD requirements.</p>
1/2/2018	WRPS-PER-2018-0007	AP TC Readings	<p>For the past several years the following weekly temperatures have been at least 30 degrees below the adjacent readings during the winter months.</p> <p>1) AP-103: SW 15, TI-48, Card 5, Ch7 2) AP-107: SW 15, TI-48, Card 5, Ch7 3) AP-108: SW 11, TI-44, Card 5, Ch3</p> <p>During the summer months the readings are relatively within the adjacent readings. If I were to guess, I would think that they are reading the ambient temperature.</p> <p>Original PER: WRPS-PER-2016-2263</p>

1/2/2018	WRPS- PER- 2017- 2787	Hanford Information System Inventory (HISI) data displays out-of-date "Status" in the Core Information area for multiple soft	TF-17-QSR-254, Finding 01: Hanford Information System Inventory (HISI) data displays out-of-date "Status" in the Core Information area for multiple software applications. The entries should be verified and updated to reflect the correct and current status for the following Applications & HISI numbers: CP-DET #2433, MSC #3636, DLM_SUITE_ORACL #3876, OmniServer #3892, PSETRAINING #3076, WIT #3775, HVAC software #4004, DAT #3781, SCENE #3508, ATFEMCS #2836, WFEMCS #2801.
1/2/2018	WRPS- PER- 2017- 2818	There is no time constraint for review of software development activities.	TF-17-QSR-254 Observation 01: There is no time constraint for review of software development activities. Upon registration of a software application in the Hanford Information Systems Inventory (HISI) with a status of "In Development", there should be scheduled follow-on steps or activities that prompt a status update. After some period of time (e.g., six months), the procedures should require delivery of documentation resulting from software development, implementation and/or maintenance and revision activities.
1/2/2018	WRPS- PER- 2017- 2819	There is no time constraint for the evaluation of software.	TF-17-QSR-254 Observation 02: There is no time constraint for the evaluation of software. It was observed that a number of the surveyed "In Development" entries were initially registered in the Hanford Information Systems Inventory (HISI) so they could be evaluated, not developed. HISI Administration should add "Evaluate" or "Evaluation" to the list of status options. The procedures should then require a clock to start running with periodic reviews of the software at a prescribed interval (e.g., 90 days). Software that has been acquired and installed for evaluation should be scheduled for removal after adequate time (e.g., six months) has passed for that evaluation.

1/2/2018	WRPS-PER-2018-0006	Rad Con missed surveillances due to weather	<p>Due to the Holiday week and excessive snow and ice work cancellation Retrieval and Closure Rad Con was unable to perform all of the required routine surveillances for the week ending 12/31/2017. The routines that were not performed included:</p> <ol style="list-style-type: none"> <li>1) CO-W-029 High Radiation Area</li> <li>2) CO-W-032 Hot Spots</li> <li>3) CO-W-060 Demister Dose Rate</li> <li>4) CO-W-061 POR-008 Ventilation Duct Valves Contamination Survey</li> <li>5) CO-W-067 AX to AP Farm RBA</li> <li>6) CO-W-069 POR-126 Ventilation Duct Valves Contamination Survey</li> <li>7) CO-W-070 POR-127 Ventilation Duct Valves Contamination Survey</li> <li>8) CO-W-071 AX Farm Breather filters</li> </ol>
1/2/2018	WRPS-PER-2018-0008	Employee slipped on ice resulting in injury	Winter hazards result in slips/trips/falls and various injuries.
1/2/2018	WRPS-PER-2018-0009	Procedure correction	TFC-ENG-DESIGN-P-54, "Checking of Engineering Documents," Revision A-6, does not contain a Section 3.4. Table of does contain a Section 3.4 listing. Appears Section 3.4 was inadvertently deleted in update to Rev A-6 from Rev A-5.

1/3/2018	WRPS- PER- 2018- 0010	242A Radiological and Housekeep- ing Issues	<p>I performed a MOP on 01/02/18 at the 242-A facility. I had the RCFLM attend MOP so any identified issues were resolved in a timely manner. The following items were identified:</p> <ol style="list-style-type: none"> <li>1. Status Map should denote area surveyed upon entry for cover block section. Evaporator and Pump Room status map does not have a survey frequency or variable task number listed as a reference.</li> <li>2. At survey station, there is a bell to ring if needing HPT assistance. The bell rings in a room that the HPT's no longer occupy. The bell needs to ring in the 242-A control room, removed or a telephone needs to be placed where employees can call for assistance without crossing radiological boundary.</li> <li>3. Condenser room was posted as "Entry Restricted IHT Monitoring required. Upon contacting control room, they did not know why the door was posted that way.</li> <li>4. Loading room inner Air Lock has a Radiation Area posting on the door that is being partially covered by a Contamination Area sign.</li> <li>5. Crane entry hall needs housekeeping, laundry bag is full, signs on the floor, etc.</li> <li>6. Hallway exiting to courtyard needs housekeeping. Large quantity of supplies were left over from a previous job last week.</li> <li>7. In courtyard, a "Removal of protective clothing" instructions sheet is hanging on the scaffolding next to the building along with a masslin mop with used masslin leftover from a previous job.</li> <li>8. Radioactive Material label was laying on the ground. This tag was supposed to be on the gray waste container used in last week's job. There was not 2 means of attachment on the label to the waste container. Also, there were 2 RMA tags affixed on the grey waste container that are partially defaced with NA written on them.</li> </ol>
1/3/2018	WRPS- PER- 2018- 0011	Ecology raises question regarding need for major risk signage for SSTs	<p>Ecology raises question regarding need for major risk signage for SSTs.</p> <p>In its 2017 SST inspection closeout report, 17-NWP-172, Ecology noted the following concern:</p> <p>"WAC 173-303-640(5)(d) states that all tank systems holding dangerous waste must be marked with labels or signs to identify the waste contained in the tank. The label or sign must be legible at a distance of at least fifty feet, and must bear a legend which identifies the waste in a manner which adequately warns employees, emergency response personnel, and the public of the major risk(s) associated with the waste being stored or treated in the tank system(s).</p> <p>During the inspection I did not observe any major risk labels or signs along any of the fence lines, at entrances to the Single Shell Tank farms, or at any aboveground portions of tanks from my location outside of the tank farms that adequately warned employees, emergency response personnel, and the public of the major risk(s) associated with the waste being stored or treated in the Single Shell Tank System. I did not gain entry into the Single Shell Tank farms to verify if such labeling was posted on the aboveground portions of the tanks themselves. If such labeling does not exist, WRPS and USDOE-ORP should at a minimum post the entrances to the active portions or on portions above each tank systems with signs that at a minimum contain the applicable dangerous waste characteristics and criteria of ignitable, corrosive, reactive and toxic and the applicable hazards identified for listed dangerous wastes on signs that are legible at a distance of at least fifty feet."</p>
1/3/2018	WRPS- PER- 2018- 0012	Incorrect spelling identified on H-14- 107346 (routing board) drawing	<p>During Routing Board update of Sheet 1 of H-14-107346, an incorrect spelling was discovered. "Assurance was misspelled as "Assurence". H-14-107346, sheets 2,3,4,5,6,7 also had the same issue.</p>

1/3/2018	WRPS- PER- 2017- 2823	AP Tank Farm Primary Exhauster B- Train (296-A- 49) experienced an unplanned shutdown.	AP Tank Farm Primary Exhauster B-Train (296-A-49) experienced an unplanned shutdown.
1/3/2018	WRPS- PER- 2017- 2821	POR- 126/127 Unplanned Shutdowns 11/20/17	POR-127 (296-P-50) was discovered shutdown at 0945 hours on 11/20/17. The exhauster was restarted at 1052 hours and immediately shutdown again. Simultaneously, POR-126 (296-P-49) experienced an unplanned shutdown at 1052 hours.
1/3/2018	WRPS- PER- 2018- 0013	Waste compatibility assessment Procedure change	RPP-RPT-60040, Waste Compatibility Assessment of 222-5 Laboratory Waste with Tank 241-SY-101 Waste, was reviewed, approved, and released without review and approval by an Environmental Representative. Procedure TFC-ENG-CHEM-P-13, Tank Waste Compatibility Assessments, requires that an Environmental Representative review and approval every waste compatibility assessment.

1/3/2018	WRPS-PER-2018-0014	244-TX tank level increase	<p>During the quarterly Verification and Validation trending analysis it was observed that the level trending of the liquids in 244-TX Tank is continuing an upward projection. The last manual Enraf level was 41.40 inches taken on 12/05/2017.</p> <p>The level is slowly increasing and the level is not expected to reach 43 inches for approximately 2 more years.</p> <p>LCO 3.6, DCRT Steady-State Flammable Gas Control provides the option to monitor for tank headspace flammable gas concentrations to ensure that the concentration "...shall be less than or equal to 25% of the LFL" for tank levels not exceeding a maximum waste level 62 inches.</p> <p>Recommend that this PER be a trending PER with no other actions required at this time.</p>
1/4/2018	WRPS-PER-2018-0017	Failure to make a real-time log entry documenting a major equipment status change.	<p>TITLE for PER: Failure to make a real-time log entry documenting a major equipment status change.</p> <p>Review of AY101 Annulus Exhauster Maintenance</p> <p>Summary: During 7AM Production Operations morning meeting on 12/19/2017, the CSM stated that the AY101 Annulus Exhauster was found "ON" during Operator Rounds on Swing Shift, after it was reported to be out of service during Shift Turnover. It was stated that it may have something to do with the push button stop switch they had problems with the previous week. The FR followed up by reviewing eTurnover, eLogs and had discussions with both the AZ Area Day Shift Manager and the CSM. It was determined that no log entry was made by the CSM reporting the status change of major equipment (35507-TF-F01). It was also determined that Operations was not aware that the exhauster started after removing the lockout tagout, following replacement of the push button off switch for the exhauster (35507-TFF02).</p> <p>Issue Type: Finding (Level 3) Significance Level: 1 Statement: 35507-TF-01, Failure to make a real-time log entry documenting a major equipment status change.</p> <p>Discussion: Following the 7AM Production Operations meeting on 12/19/2017 the FR followed up by reviewing the eTurnover from AZ Team to CSM on 12/18/2017 and the CSM eLogs. The AZ Team to CSM Turnover showed the status of the AY101 Annulus Exhauster as "O/S" or out of service. In reviewing the eLogs it was determined that no log entry was made by the CSM to document a major equipment status change after the exhauster was found "ON" during Swing Shift, after being reported as "O/S" during shift turnover from the AZ Area Day Shift Manager. In follow-up discussions with the CSM, the FR questioned why no log entry had been made. It was stated that no log entry was made because it was unknown as to whether it should be operating. A phone message was left at approximately 10pm on 12/18/2017 for the Day Shift Manager to determine if AZ team had returned the exhauster to service. In discussions with the AZ Area Day Shift Manager he stated that he did not receive the message until the morning of 12/19/2017 at which time he returned the call to the CSM, stating it was out of service for maintenance.</p> <p>REF: TOD Weekly 12-25-17; K Ebert; Finding Level 3; OA35507</p> <p>Requirements: TFC-OPS-OPER-C-17, REV C-22 Operating Logbooks 4.1 Operating Logbooks Process</p>
1/4/2018	WRPS-PER-2018-0018	Operations failed to effectively turnover equipment status and in progress work activities from one shift to the next.	<p>TITLE of PER: Operations failed to effectively turnover equipment status and in progress work activities from one shift to the next.</p> <p>Review of AY101 Annulus Exhauster Maintenance</p> <p>Summary: During 7AM Production Operations morning meeting on 12/19/2017, the CSM stated that the AY101 Annulus Exhauster was found "ON" during Operator Rounds on Swing Shift, after it was reported to be out of service during Shift Turnover. It was stated that it may have something to do with the push button stop switch they had problems with the previous week. The FR followed up by reviewing eTurnover, eLogs and had discussions with both the AZ Area Day Shift Manager and the CSM. It was determined that no log entry was made by the CSM reporting the status change of major equipment (35507-TF-F01). It was also determined that Operations was not aware that the exhauster started after removing the lockout tagout, following replacement of the push button off switch for the exhauster (35507-TFF02).</p> <p>Issue Type: Finding (Level 3) Significance Level: 1 Statement: 35507-TF-02, Operations failed to effectively turnover equipment status and in progress work activities from one shift to the next.</p> <p>Discussion: During 7AM Production Operations morning meeting on 12/19/2017, the CSM stated that the AY101 Annulus Exhauster was found "ON" during Operator Rounds on Swing Shift, after it was reported to be out of service during Shift Turnover. It was stated that it may have something to do with the push button stop switch they had problems with the previous week. The FR followed up by reviewing eTurnover, eLogs and had discussions with both the Area Day Shift Manager and the CSM. In discussions with the AZ Area Day Shift Manager it was stated that the stop switch was replaced on 12/18/2017 as part of a troubleshooting level 3 work package (WO#379019). The work scope of the work package was the following: "AY101-VTA-EF-001 Exhauster fan not shutting down when initiating stop button. Need to have Electricians trouble shoot cause." An AZ team log entry on 12/19/2017 and discussions with the AZ Area Day Shift Manager showed that the AY101 Annulus exhauster started upon removal of the Lockout Tagout at approximately 1510 on 12/18/2017. The startup of the annulus exhauster after removing the lockout tagout was unknown at the time. Based on information from the AZ Area Day Shift Manager no post maintenance testing was performed on 12/18/2017 day shift following the switch replacement and operations did not check the status of the Exhauster after removing the lockout tagout, with the breakers in the "ON" position. This resulted in the exhauster starting up without the knowledge of Operations. As the maintenance was not yet complete, the AY101 Annulus exhauster was reported as out of service during shift turnover from AZ Team to the CSM.</p>

1/4/2018	WRPS-PER-2018-0020	Chemical concentrations exceeded occupational exposure limit values with no documentation	<p>TITLE of PER: documented chemical concentrations on survey report exceeded occupational exposure limit values, no documented explanation of the issue</p> <p>18231-TF, Surveillance of Industrial Hygiene Data in the Site-Wide Industrial Hygiene Database</p> <p>Scope: The U.S. Department of Energy, Office of River Protection (ORP) conducted a surveillance to review the Washington River Protection Solutions LLC (WRPS) industrial hygiene (IH) data in the Site-Wide Industrial Hygiene Database (SWIHD). The purpose of the surveillance was to verify and validate that WRPS IH data was being properly reviewed and appropriately managed, in accordance with 10 CFR 851, "Worker Safety and Health Program," and TFC-PLN-02, Quality Assurance Program Description, Rev. H-3, dated August 30, 2016.</p> <p>18231-TF-FOI - The assessors identified several examples of where the documented chemical concentrations on the survey report exceeded their respective occupational exposure limit values and there was no documented explanation of the issue (Pl-3, (b)(6) (b)(6), Wescott).</p> <p>Requirements: Contract No. DE-AC27-08RV14800, Tank Operations Contract, Section C.3.2.4, "Quality," required: The Contractor shall develop, submit for DOE-ORP approval, and implement a Quality Assurance Program Description (Deliverable C.3.2.4-1) that describes the overall implementation of DOE quality assurance (QA) requirements. The QAP shall be applied to all (not just ES&amp;H) work performed by the Contractor.</p> <p>TFC-PLN-02, Rev. H-3, Section 5.1, step 1 required: Activities affecting quality and services shall be prescribed by and performed in accordance with documented instructions, procedures, and drawings that include or reference appropriate quantitative or qualitative acceptance criteria for determining that prescribed activities have been satisfactorily accomplished.</p> <p>TFC-PLN-34, Industrial Hygiene Exposure Assessment Strategy, Rev. E-7, Section 3.0, "Exposure Assessment Strategy Process," Section 3.8, "Data Collection and Evaluation," required: IHs shall perform appropriate evaluative methods of collected data and determine the acceptability of potential exposures using recognized, consensus methods in accordance with applicable standards and procedures, including the AIHA publication "A Strategy for Assessing and Managing Occupational Exposures."</p> <p>TFC-ESHQ-5_IH-C-46, Section 4.5.2, steps 18 and 20 required:</p>
1/4/2018	WRPS-PER-2018-0021	Recommend addition of CAM Approval within Asset Suite Software to preclude human error and increase efficiency in processing	<p>The following Findings, Observations, and Process Improvements were developed during the course of this Quality Assurance Surveillance TF-17-SR-243 - CAM Approval and Invoice Process. Please reference attached Surveillance for detailed review of deficiency.</p> <p>Requirement: Requirements, as delineated within TFC-PLN-147, Revision B-1, Project Controls System Description, Dated: October 30th, 2017, Section 8.4.3 - Material and Subcontract Actual Cost of Work Performed: "Payment for subcontracts or services is made through the BMS System. Invoices for subcontracts, progress payment type materials or services performed for the project are approved by the appropriate CAM." "CAM Approval indicates that the material, service or subcontracted effort was performed in accordance with the subcontract."</p> <p>Deficiency: Contrary to the requirements, the following Invoice was not approved by the CAM prior to processing for payment. Review of the Invoice determined that Procurement/BTR/Accounts Payable processed the invoice for payment without CAM Approval. Project: 56475-006 Subcontract: Freestone Environmental Services Entry Dated: 10/31/2017 Invoice: 215086</p> <p>Recommendation: The CAM Approval currently relies on email for approval and is currently subject to Human Performance. Recommend addition of CAM Approval within Asset Suite Software to preclude human error and increase efficiency in processing.</p> <p>Observation 1: Requirements, as delineated within TFC-PLN-147, Revision B-1, Project Controls System Description, Dated: October 30th, 2017, Section 8.4.3 - Material and Subcontract Actual Cost of Work Performed: "Payment for subcontracts or services is made through the BMS System. Invoices for subcontracts, progress payment type materials or services performed for the project are approved by the appropriate CAM." "CAM Approval indicates that the material, service or subcontracted effort was performed in accordance with the subcontract." •CAM Approval or Concurrence currently occurs through email, rather than within Asset Suite.</p>
1/4/2018	WRPS-PER-2018-0019	MCE Procurement and Receipt of Items in support of RDOSS Development, identified deficiencies in the Mid Columbia Engineering	<p>Quality Assurance Surveillance TF-17-QSR-260, Vapors - MCE Procurement and Receipt of Items in support of RDOSS Development, identified deficiencies in the Mid Columbia Engineering (MCE) Receiving Inspection process. Specifically, the contents of a delivery were accepted based, in part, on a Certificate of Conformance (C of C) from HI-Q Environmental Products Company, Inc. which did not meet requirements stipulated in MCE Contractual Terms and Conditions, applicable MCE procedures (IP 7.2 and IP 10.4), and/or NQA-1, Requirement 7, Section 503.</p>

1/4/2018	WRPS-PER-2018-0022	Documentation errors in 14 IH survey reports	<p>TITLE of PER: Documentation errors were identified in 14 of the survey reports in the Site-Wide Industrial Hygiene Database</p> <p>18231-TF, Surveillance of Industrial Hygiene Data in the Site-Wide Industrial Hygiene Database</p> <p>Scope:</p> <p>The U.S. Department of Energy, Office of River Protection (ORP) conducted a surveillance to review the Washington River Protection Solutions LLC (WRPS) industrial hygiene (IH) data in the Site-Wide Industrial Hygiene Database (SWIHD). The purpose of the surveillance was to verify and validate that WRPS IH data was being properly reviewed and appropriately managed, in accordance with 10 CFR 851, "Worker Safety and Health Program," and TFC-PLN-02, Quality Assurance Program Description, Rev. H-3, dated August 30, 2016.</p> <p>18231-TF-F02 - Documentation errors were identified in 14 of the survey reports (PL-3, (b)(6), (b)(6), Wescott). The scope of work performed could not be reconstructed because of an inadequate level of documentation on a survey report or related sample plan.</p> <p>Requirements: Contract No. DE-AC27-08RV14800, Section C.3.2.4, required:</p> <p>The Contractor shall develop, submit for DOE-ORP approval, and implement a Quality Assurance Program Description (Deliverable C.3.2.4-1) that describes the overall implementation of DOE quality assurance (QA) requirements. The QAP shall be applied to -all (not just ES&amp;H) work performed by the Contractor.</p> <p>TFC-PLN-02, Rev. H-3, Section 5.1, step 1 required:</p> <p>Activities affecting quality and services shall be prescribed by and performed in accordance with documented instructions, procedures, and drawings that include or reference appropriate quantitative or qualitative acceptance criteria for determining that prescribed activities have been satisfactorily accomplished.</p> <p>TFC-PLN-02, Rev. H-3, Section 5.1, step 2 stated: The activity shall be described to a level of detail commensurate with the complexity of the activity and the need to ensure consistent and acceptable results.</p>
1/4/2018	WRPS-PER-2018-0023	Compliance Team corrections for the time period of 12/04/17 thru 12/20/17	<p>Compliance Team corrections for the time period of 12/04/17 thru 12/20/17-</p> <p>While HPT's were performing routine weekly surveys and WRPS Management personnel were performing field observations, for the time period, the following deficiencies were identified and forwarded to the Compliance team:</p> <ol style="list-style-type: none"> <li>1) Several (URMA-Pipeline) signs were faded on WIDS Pipeline 600-269-PL and needed to be replaced.</li> <li>2) Several (HRA signs) were faded on the Fence Panels surrounding the Pink Exhauster in BY-Farm and needed to be replaced.</li> <li>3) Several (RA signs) on the vehicle entrance gates in BY-Farm were faded and needed to be replaced.</li> <li>4) Several (UPR-600-20) signs were faded on the WIDS site UPR-600-20 and needed to be replaced.</li> <li>5) Several (URMA) signs were faded on WIDS site UPR-600-20 and needed to be replaced.</li> <li>6) Several (URMA-Pipeline) signs were faded on WIDS site 600-284-PL and needed to be replaced.</li> <li>7) A few (URMA) signs were faded on WIDS site 600-284-PL and needed to be replaced.</li> <li>8) Several (Buried Dangerous Waste Pipe) signs on WIDS site 600-284-PL were faded and needed to be replaced.</li> <li>9) It was reported that there were several areas in U-Farm where Tumbleweeds had accumulated and that they needed to be Cleaned/Picked up.</li> </ol>
1/4/2018	WRPS-PER-2018-0024	242A Unexpected Flow Trend of Process Condensate from C-100 to LERF	<p>Title: 242-A unexpected flow trend of PC from C-100 to LERF</p> <p>While performing night rounds (1/3/18 to 1/4/18), it was noticed that FQI-RC3-NM, Process Condensate Totalizer Indicator, read that approximately 30 [gal.] of Process Condensate was sent from C-100 to LERF at approximately 0900 on 1/3/18. The following actions were performed by the Shift Manager (SM):</p> <ol style="list-style-type: none"> <li>1. On night shift 1/3/18, a valve line up verification was conducted per TO-640-020. The valve line up verification confirmed all valving to be in the correct position. This line up would prevent any PC to LERF transfer from occurring.</li> <li>2. On night shift 1/3/18 the 242-A SM reviewed the day shift activities. The A1 logbook indicated, at approximately 0900 Construction personnel were walking down a future planned work activity on the PC system.</li> <li>3. On 1/4/18, a 242-A SM performed a walk down with the Construction Manager to simulate construction walk down activities from the day before. This walk down was unable to produce similar instrument indication. Discussion with the Construction Manager and his crew did not indicate any valving or components were manipulated.</li> <li>4. On 1/4/18, a 242-A SM verified that the Process Condensate pump breaker is off and has been off during time when FQI-RC3-NM showed indication of flow.</li> </ol> <p>Based on the above actions, initial indications suggest that an actual transfer from the C-100 PC tank to LERF was not possible and intermittent instrument drift or instrument error is a more likely cause.</p>

1/4/2018	WRPS- PER- 2018- 0027	Legacy Contaminati on Outside SY Farm	At approximately 9:40am this morning, while performing the monthly routine perimeter survey of SY Farm, a small spot of contamination was discovered on the North fence line just east of the Change Trailer. The spot was approximately the size of the instrument probe (100cm2) and appeared to be animal urine based on the stained dirt and lack of tumbleweeds or animal feces. The highest reading on the spot was 75,690dpm/100cm2 of contamination. No alpha contamination was detected.
1/4/2018	WRPS- PER- 2018- 0033	A leak check of the UV/OX system per work package 277150	A leak check of the UV/OX system per work package 277150/ Replace UV/OX Lamp & Tubes and Lock Out Tag Out (LOTO) # LEF-17-095, was performed on 1/2/18. The lineup was performed per ETF-60-006 to allow flooding of the system with LOTO installed. The lineup was performed at the direction of the shift manager, the NCO's were directed by the SOM to perform the valve line with 8 valves notated with a (2) which per the Special Instructions of Data Sheet 1 says "(2) Components not requiring lineup per the SOM are noted with a (2)". All 8 valves were a part of the H2O2 System which was not required for the leak test, but 4 of the valves were locked out CLOSED as a part of the LOTO. The valve line up required the 4 valves 60D-244, 60D-245, 60D-247, and 60D-248 to be opened, but the SOM had notated a (2) which did not require the NCO to change the position of the valves even though the valves per the valve lineup on Data Sheet 1 of ETF-60-006 required the valves to be OPEN. After the leak test passed, UV/OX was setup for an 8-hour leak test which required the LOTO to be removed. The leak test was then performed on Night shift and stopped as the system experienced a leak. The morning of 1/3/18 questions were asked as to whether or not the SOM should be able to direct valves to be placed in a position contrary to a valve lineup. It was found that after the leak test valve lineup was completed and the LOTO removed which changed the valve lineup by positioning the 4 valves under LOTO from CLOSED to a restoration position of OPEN, changing the valve lineup that was performed the morning of 1/2/18. But the valve lineup that was performed the morning of 1/2/18 was used by the night shift as the valve lineup to operate the UV/OX system after the LOTO changed the valve positioning. Which means that the UV/OX system was operated without a current valve lineup.
1/4/2018	WRPS- PER- 2018- 0034	Release of RPP-36610	Three Software Change Requests need to be closed to support work package closure. However, the baseline documentation (RPP-36610) has not been updated to reflect the new requirements.

1/4/2018	WRPS- PER- 2018- 0035	242A Evaporator Facility E-A-1 Reboiler Vessel Integrity Test Report	<p>Leak testing of the 242-A Evaporator E-A-1 Reboiler was performed in August of 2017. RPP-RPT-59914, 242A Evaporator Facility E-A-1 Reboiler Vessel Integrity Test Report was subsequently issued to document the acceptability of the Reboiler and show that it was able to demonstrate leak tightness per the requirements of RPP-RPT-52352, Rev. 2, 242-A Evaporator E-A-1 Reboiler – Functions and Requirements Evaluation Document.</p> <p>The report gives the following recommendations:</p> <ol style="list-style-type: none"> <li>1. Improved measures need to be implemented to prevent system and equipment contamination with tracer dye.</li> <li>2. Replace the disposable polyethylene discharge tube after each sample set is obtained.</li> <li>3. Pressure requirements for the Reboiler steam jacket (&lt; 0 psig) and the Evaporator Vessel (&gt; -10" wg) prior to the start of the 24 hour test period should be removed. Criteria should be replaced with a single requirement that the ? in pressure between the Reboiler steam jacket and the evaporator vessel be &lt; 10" wg or that the absolute pressure in the Reboiler steam jacket must be &lt; absolute pressure in the evaporator vessel.</li> <li>4. Requirement to run the steam system at 7000 lb/hr should be relaxed or removed. In its place a requirement to collect at least 160 gallons of steam condensate should be implemented.</li> </ol>
1/4/2018	WRPS- PER- 2018- 0036	AY102- WSTA-LDT- 152 has lost power	AY102-WSTA-LDT-152 has lost power.
1/4/2018	WRPS- PER- 2018- 0037	Stop Work on tight fitting respirators	Stop Work on tight fitting respirators was issued due to multiple people in a work group smelling a cleaning solution inside their SCBA mask. One individual in the work group experienced a burning sensation on their face along with a rash.

1/4/2018	WRPS- PER- 2018- 0038	TFC-ENG- ADMIN-CD- 20 needs to be revised or cancelled	<p>Assigned Engineering MOP for December 2017 - Procedure TFC-ENG-ADMIN-CD-20, "Troubleshooting Guidelines", was selected for a procedure usage/effectiveness review.</p> <p>The evaluation method selected for this MOP was to conduct a brief survey of several engineers in the Production Operations, Tank Farm Projects and Retrieval engineering organizations. The results are summarized below, and more detailed response comments are contained within the MOP:</p> <p>A. Were you aware that the procedure exists? YES (4) &amp; NO (2)</p> <p>B. Are you using this procedure when developing troubleshooting plans or work packages - YES (0) &amp; NO (6)</p> <p>C. Do you see beneficial value in keeping this procedure - YES (4), NO (0) &amp; Doesn't matter (2)</p> <p>These results are somewhat confusing in that the procedure isn't being used, but individuals recommend it should be kept as guidance. This may indicate that some improvements might make the procedure more useful/beneficial.</p>
1/5/2018	WRPS- PER- 2018- 0039	Less than satisfactory performanc e in Conduct of Operations at the Effluent Treatment Facility	<p>Title: Less than satisfactory performance in Conduct of Operations at the Effluent Treatment Facility (ETF)</p> <p>A trend was declared at the Collective Significance Review (CSR) committee meeting on 1/4/18 in the area of less than satisfactory performance in Conduct of Operations at the Effluent Treatment Facility (ETF). The attached list of DOE-ORP initiated PER's supported the declaration of a trend. The issues identified in the 21 PER's demonstrate areas for improvement in a range of Conduct of Operations fundamentals such as procedure usage, shift routines &amp; operating practices, control of equipment &amp; system status, event investigation, staffing and communications.</p> <p>The purpose of this PER is to document the CSR decision to declare a trend and to track the path forward, assessment activities, and subsequent actions. Compensatory measures have been implemented in the individual issues that support this trend as appropriate. Production Operations management is considering additional compensatory measures as a result of declaring a trend.</p> <p>A facility specific Conduct of Operations assessment plan is in development (and a team assigned) to perform a review in January to gather data and develop an action plan for improvements at ETF.</p>
1/8/2018	WRPS- PER- 2018- 0040	No guidance for completing form a-6006- 622	<p>There is no procedure or guidance for completing Form A-60060622, the form for "WRPS exemption from standard shift request".</p> <p>Recommend this PER be assigned to HR.</p>

1/8/2018	WRPS-PER-2018-0041	radial filter replacements in SX Farm	While performing radial filter replacements in SX Farm it was noted (as required) to report any UNSAT conditions per 5-VT-710, Data Sheet 3. UNSAT condition were as follows (1) missing labels on SX113-WST-FLT-101, SX114-WST-FLT-101 (2) Old style bird screens to be replaced with newer style on SX101-WST-FLT-101, SX109-WST-FLT-101, SX112-WST-FLT-101.
1/8/2018	WRPS-PER-2018-0016	27165 Inspection of RMA Ladder not complete and Roof Access Ladder needs new notice sign	The following were identified during the December 2017 safety inspection walkdown: 27165 Annual inspection of RMA ladder has not been completed 27165 New notice sign is needed on the outside of 27165 fixed ladder for roof access
1/8/2018	WRPS-PER-2018-0042	242-T SCA HPT discovered 1 area of contamination on approximately 100cm2 just outside the SCA on the south end of the SCA.	*** Compliance Issue - Soil Contamination Outside a Posted SCA *** At approximately 8:50am this morning, while performing a monthly routine survey of the boundary of the SCA located outside 242-T, near Camden Ave. The HPT discovered 1 area of contamination approximately 100cm2 just outside the SCA on the south end of the SCA. The contamination values were 23,550dpm/100cm2 of Beta-Gamma contamination and 42dpm/100cm2 of Alpha contamination. The HPT checked metal stanchions and rocks in the vicinity to verify no removable contamination was present. The readings were direct readings and the contamination appeared to simply be dirt/soil mixture on the ground. The SCA is located very close to WIDs Site UPR-200-W-167. The same type of contamination spread from the same SCA occurred approximately 4 months ago on 09/19/17. The monthly boundary survey was established following that contamination discovery.

1/8/2018	WRPS- PER- 2018- 0044	SL-161 Is Not Fit For Use and Full of Waste	<p>241-AN Tank Farm waste transfer line SL-161 is currently full of liquid, as previously noted in PER#WRPS-PER-2014-2257. When the system was discovered to be full of water in 2014, the line was within it's 10 year Fitness-For-Service (FFS) periodicity for performing an encasement pneumatic test. The encasement for this line was last successfully pneumatically tested in 2005, so the 10 year FFS periodicity expired in 2015. Since SL-161 is not currently certified for use, the system should either be drained or the encasement should be pneumatically tested and placed back in service.</p> <p>Background: Section 6.1.3 of HNF-SD-WM-TSR-006 states the following: Scheduled integrity assessments shall be performed as required to meet regulatory requirements as documented in the environmental management program and required by Washington Administrative Code (WAC) 173-303, "Dangerous Waste Regulations." The required schedules or intervals are as described in the integrity assessments. RPP-RPT-58441, Rev. 1, is the current integrity assessment for waste transfer lines. The 2016 DSTAR (Table 5-5, RPP-RPT-58441, Rev. 1) notes that SL-161 must be pressure tested prior to next use. The routing board drawing (H-14-107346, Sheet 6) also currently depicts SL-161 as being beyond the 10 year FFS encasement pneumatic testing requirements.</p> <p>From an extent of condition perspective, SNL-5350 is also beyond the 10 year FFS encasement pneumatic testing periodicity and is mostly full of waste. PER# WRPS-PER-2017-2519 was issued to document that lines SNL-5350 and SNL-5351 were beyond the 10 year FFS encasement pneumatic testing periodicity. SNL-5350 is in the process of being tested.</p>
1/8/2018	WRPS- PER- 2018- 0045	Clarify when to utilize the indoor/outd- oor function of the WBGT	<p>During the IHT Fundamentals, the instructor was explaining when to utilize the indoor/outdoor function of the WBGT. The question was raised regarding the indoor setting.</p> <p>Within the procedure, there is no clear guidance as when this function is used. For example: does the indoor setting get utilized when there is no direct radiate heat (inside the building; change tent, office building); or can be used outdoor in the shade?</p> <p>The IHT that was in the course had a different opinion than the instructor.</p>
1/8/2018	WRPS- PER- 2018- 0046	AY-102-VTP- FLT-001 Weather Cover Is Missing Label	AY-102-VTP-FLT-001 weather cover is missing label.

1/8/2018	WRPS-PER-2018-0047	There is a conflicting requirement between TFC-ESHQ-ENV_PP-C-11, REV C-0 and the Hanford Site RCRA Permit Condition II.R.2.	There is a conflicting requirement between TFC-ESHQ-ENV_PP-C-11, REV C-0 and the Hanford Site RCRA Permit Condition II.R.2. Permit Condition II.R.2 states the following: "The Permittees will place in the Operating Record (within seven [7] days after the change is put into effect) the substitution documentation, accompanied by a narrative explanation, and the date the substitution became effective. Ecology may judge the soundness of the substitution." ■ TFC-ESHQ-ENV_PP-C-11, REV C-0, Figure 1. Logic for Determining Need for IQRPE Assessment and Certification. Note 11 states the following: "The WAC does not specifically grant an exception for "Replacement in Kind." According to Appendix I in WAC 173-303-830, equipment replacement or upgrading with functionally equivalent components (e.g., pipes, valves, pumps, etc.) requires a Class 1 permit modification."
1/8/2018	WRPS-PER-2018-0048	Review and possibly revise requirements and references sections for listed documents	Documents require updates to ensure that all requirements and references identified are accurate and listed in the requirements/reference section.
1/9/2018	WRPS-PER-2018-0049	242-A K-1 ventilation system (296-A-21A) experienced an unplanned shutdown 1/4/18	242-A K-1 ventilation system (296-A-21A) experienced an unplanned shutdown.

1/9/2018	WRPS-PER-2018-0050	John Deere Crossover Gator™ utility vehicles Product Recall (18-709)	<p>John Deere Crossover Gator™ utility vehicles Product Recall (18-709) was issued by the Consumer Product Safety Commission on 12/21/2017; a copy of the recall information was published to OPEXSHARE on 01/08/2018 [see attachment, 'Safety Notice - John Deere Crossover Gator (Recall number 18-709)'. This recall involves a repair as the steering shaft can separate from the steering rack assembly and result in a loss of vehicle steering control, posing a crash hazard. 68,300 vehicles were sold between March 2012 and November 2017; nine reports of steering loss. No injuries have been reported.</p> <p>Distribution of OPEX/LL content to WRPS Subject Matter Experts on 01/08/2018 resulted in the identification of (3) WRPS gators affected by this recall [see attachments, 'RE_SME Evaluation Requested...' and 'WRPS Serial Numbers'. Serial #s/Property #s are as follow:</p> <p>1M0825GECHM133894 – UNIT #HO-01M-00200  1M0825GEJHM134364 – UNIT # HO-01M-00201  1M0825GETGM118417 – UNIT # HO-01M-00248</p> <p>The Property Management Manager directed (01/08/2018) the managers of the three affected gator units to:</p> <ol style="list-style-type: none"> <li>1. Remove from service.</li> <li>2. Coordinate w/ Mission Support Alliance (MSA) Fleet Services to send the affected gator(s) to RDO Equipment (John Deere) for recall/warranty repair. Estimated time for repair/return is ~1-2 weeks.</li> </ol> <p>=====</p> <p>Note: John Deere is in process of contacting purchasers of recalled gator(s) directly. This recall was conducted, voluntarily by the company, under CPSC's Fast Track Recall process. Fast Track recalls are initiated by firms, who commit to work with CPSC to quickly announce the recall and remedy to protect consumers.</p>
1/9/2018	WRPS-PER-2017-2717	Evaluate if WRPS' procedures need to be broken down into smaller tasks or reformatted	Evaluate if WRPS' procedures need to be broken down into smaller tasks or reformatted
1/9/2018	WRPS-PER-2017-2719	Provide a sustainable leadership training program for the EAPC Chairs/CO-Chairs	Provide a sustainable leadership training program for the EAPC Chairs/CO-Chairs and EAPC Committee Members

1/9/2018	WRPS- PER- 2017- 2720	Create a S&H (Haz ID) training program for EAPC Volunteers	Create a S&H (Haz ID) training program for EAPC Volunteers
1/9/2018	WRPS- PER- 2017- 2721	Improve Bargaining Unit Participation in CVST Subcommittees	Improve Bargaining Unit Participation in CVST Subcommittees
1/9/2018	WRPS- PER- 2017- 2722	Reduce the overall repair and calibration time for IH equipment repair	Reduce the overall repair and calibration time for IH equipment repair

1/9/2018	WRPS-PER-2017-2723	Create an active shooter/weapon event training and create discussion points for teams/work area for other emergencies	Create an active shooter/weapon event training and create discussion points for teams/work area for other emergencies
1/9/2018	WRPS-PER-2017-2724	Develop and improve the WRPS mentoring program/process	Develop and improve the WRPS mentoring program/process
1/9/2018	WRPS-PER-2017-2826	Lessons Learned/OPEXSHARE	<p>Lessons Learned/OPEXSHARE content, 'Integrating the Employee Suggestion Program Tracking into the Issue Management System Added Value', was published to OPEXSHARE by Nevada National Security Site, NNSS on 12/06/2017, regarding a 'Bright Ideas Program' implemented to recognize employees for their suggestions related to improving safety or processes, minimizing risks, or implementing cost savings (for company and employees) by documenting the opportunities/ideas in the NNSS 'Issues Management System' [IRIS] - see attached lessons learned '2017-NV-NNSS-658 Integrating the Employee Suggestion Program Tracking into the Issue Management System Added Value'.</p> <p>Several benefits [realized by NNSS] of the recent integration of Bright Ideas into IRIS include:</p> <ul style="list-style-type: none"> <li>• Improved accountability of ideas from suggestion through evaluation and implementation;</li> <li>• Guaranteed feedback to the individual providing the suggestion;</li> <li>• Improved employee engagement (e.g., my opinion/voice counts); and</li> <li>• Suggestions that are actual deficiencies can be elevated to higher priority to ensure correction.</li> </ul> <p>This is equivalent to WRPS' Problem Evaluation Report (PER - Issues Management System) Performance Improvement Evaluation/Continuous Improvement Measure (PIE/CIM) designation - which is designed to encourage employees to explore and document new ideas/opportunities for improvement/external good work practices or company best practices determined to be applicable to the WRPS work activities and processes, with the potential to be the basis for significant operational improvements or cost savings, etc.</p> <p>HOWEVER - NNSS individuals who submit ideas (Bright Ideas Program in conjunction w/ IRIS) are also considered for a cash [monetary] award.</p> <p>A few inquiries/comments from employees who reviewed the OPEXSHARE content, 'Integrating the Employee Suggestion Program Tracking into the Issue Management System Added Value' were received by the WRPS Operating Experience/Lessons Learned Program coordinator as follows:</p> <ol style="list-style-type: none"> <li>1. Who (at WRPS) is in charge of the 'Bright Ideas Program'.....</li> <li>2. We should incorporate the same (type of program).....</li> </ol> <p>.....</p> <p>My response to the above employee inquiries follows:</p> <p>"Subject Lessons Learned/OPEXSHARE content was published by Nevada National Security Site, NNSS. WRPS does not have a 'monetary' award program.</p> <p>However, would be equivalent to our WRPS Issues Management System, Problem Evaluation Request (PER), a PER submittal documenting the (great or bright) idea/suggestion with a PER being screened to significance level designation as a PIE/CIM (Performance Improvement Evaluation/Continuous Improvement Measure), however without the (monetary incentive) submittal for a cash award...see PER procedure, TFC-ESHQ-Q_C-C-01, Section 4.10 &amp; Attachment C @ link: <a href="http://idmsweb.rl.gov/idmsprod/livelink.exe/fetch/2000/18814/1081672/60849/3330687/4009174/885541/3481294/TFC-ESHQ-Q_C-C-01%2C_Problem_Evaluation_Request.pdf?noifeid=3481302&amp;vernum=2">http://idmsweb.rl.gov/idmsprod/livelink.exe/fetch/2000/18814/1081672/60849/3330687/4009174/885541/3481294/TFC-ESHQ-Q_C-C-01%2C_Problem_Evaluation_Request.pdf?noifeid=3481302&amp;vernum=2</a>.</p> <p>"...The PIE/CIM PER is designed to encourage employees to explore new ideas. A PIE/CIM is an opportunity for improvement. See Attachment C for further definition of a PIE/CIM PER..."</p>

1/9/2018	WRPS-PER-2018-0052	Management Observation Program (MOP) reports difficult to extract	Management Observation Program (MOP) reports contain trend data that is difficult to extract. Unlike PER's, there are no trend codes assigned to MOPs. As a process improvement suggestion, revise the MOP program to enable the addition of trend codes and the ability to search and provide reports on trend codes.
1/9/2018	WRPS-PER-2018-0053	The adapter was not painted per ECN-713840	<p>Description of Nonconformance</p> <p>Required condition: One ENRAF offset rotation adapter for AN farm, Work Package 363186. The associated ECN-713840 called out "NOTE X2" which states that the adapters are to be painted with 1 coat of Primer and 2 coats of Exterior Enamel. Location of ENRAF equipment is AN101-WSTA-LDT-153 (RISER 61).</p> <p>Actual condition: The adapter was not painted per ECN-713840. This adapter is installed in AN farm.</p>
1/9/2018	WRPS-PER-2018-0054	AZ 401 building indicated removable contamination on values of 75,000 dpm/100cm <sup>2</sup> beta-gamma no alpha	HPTs were performing pre-job surveys of the AZ 401 building in support of maintenance activities. Radiological surveys performed indicated removable contamination values of 75,000 dpm/100cm <sup>2</sup> beta-gamma no alpha. This area has previously been identified with reoccurring issues of contamination build-up/spread. The following PERs; PER-2003-3487, CH2M-PER-2006-2055, CH2M-PER-2008-1576, WRPS-PER-2016-0077 and WRPS-PER-2016-1948 each identified issues and recommended action to prevent the spread or build-up of contamination within the AZ-401 building.

1/9/2018	WRPS-PER-2017-2761	Pipe in 222-S Duct Level with Open End Asbestos Containing Thermal System Insulation	<p>During the annual 222-S laboratory asbestos inspection, a pipe was identified in the 222-S duct level that has an open end on the asbestos containing thermal system insulation (TSI) wrapping. Pipe is located directly above WRPS-RMA-149. Open end of the TSI needs to be encapsulated.</p> <p>Per TFC-ESHQ-5_IH-C-52 Asbestos Exposure Control and Management, Section 3.2: If the condition of ACM/PACM has deteriorated, corrective action will be identified through established mechanisms of corrective action, such as the Problem Evaluation Request (PER) process.</p>
1/9/2018	WRPS-PER-2017-2763	Crack in Asbestos containing thermal system insulation wrapping on pipe on west exterior wall 222-S	<p>During the annual 222-S laboratory asbestos inspection, a crack was identified in the asbestos containing thermal system insulation (TSI) wrapping. Pipe is located along the west exterior wall of the 222-S duct level, north of door 21.</p> <p>Per TFC-ESHQ-5_IH-C-52 Asbestos Exposure Control and Management, Section 3.2: If the condition of ACM/PACM has deteriorated, corrective action will be identified through established mechanisms of corrective action, such as the Problem Evaluation Request (PER) process.</p>
1/9/2018	WRPS-PER-2018-0056	Logical inconsistency has been discovered in the safety basis controls related to pneumatic testing of encasements	<p>As documented in MOP, a logical inconsistency has been discovered in the safety basis controls related to pneumatic testing of encasements after the initial test(s) fail and safety-significant compressed air system pressure relieving devices are required for any subsequent tests. This inconsistency among the safety basis controls is described below.</p> <p>DSA Section 3.3.2.4.5.2 indicates that when conducting the pneumatic testing, there may be instances where the test fails and the desired pressure is not maintained. After the initial failure to maintain the desired pressure, the following rules apply to subsequent testing:</p> <ul style="list-style-type: none"> <li>* When the initial failure is attributable to the encasement (e.g., there is a probable source of the leakage such as an aging encasement drain valve or leakage from connections with the test manifold) and the safety-significant primary pipe remains operable based on available evidence (e.g., there have been recent transfers [within ten years] through the piping with no evidence of leakage) one additional pneumatic test may be performed. If this test fails, then the safety-significant compressed air system pressure relieving devices must be used for any subsequent tests.</li> <li>* When the initial failure is indeterminate (e.g., there is no identified probable source of leakage from the encasement and/or there is less available evidence that the safety-significant primary piping remains operable [no waste transfers have been made through the piping within ten years]), then safety-significant compressed air system pressure relieving devices must be used for any subsequent tests.</li> </ul> <p>As described above when the operability of the associated safety-significant waste transfer primary piping system is indeterminate, testing may continue but use of safety-significant compressed air system pressure relieving devices is required. Herein lies the inconsistency. The tank farms TSRs by way of Design Feature 6.1 require waste transfer primary piping systems to be operable when a compressed air source is connected to the waste transfer primary piping system's encasement for pneumatic testing of the encasement. No exception is made for the case where the operability of the associated safety-significant waste transfer primary piping system is indeterminate.</p> <p>The safety basis amendment that created this structure for pneumatic testing of encasements was implemented in 2016 and to date there has been no instance where the operability of the associated safety-significant waste transfer primary piping system was indeterminate and safety-significant compressed air system pressure relieving devices were used for subsequent testing. The forward-looking concern is that if the operability of the associated safety-significant waste transfer primary piping system is indeterminate, how does one meet the Design Feature 6.1 requirement that waste transfer primary piping systems are to be operable when connected to a compressed air source.</p> <p>The MOP/PER author was the Nuclear Safety engineer responsible for the processing the safety basis amendment that created this structure and now recognizes that Design Feature 6.1 should have been revised to allow an exception. Specifically, Design Feature 6.1 needs to be revised to require waste transfer primary piping systems to be operable when a compressed air source is connected to the waste transfer primary piping system's encasement for pneumatic testing of the encasement except when the operability of the associated safety-significant waste transfer primary piping system is indeterminate and compressed air system pressure relieving devices are being used as required by Section 6.7. That was the intent of the control strategy for pneumatic testing.</p>

1/9/2018	WRPS- PER- 2017- 2800	222-5 Peeling thermal system insulation wrapping on pipe above Zone 7, Riser 4	<p>During the annual 222-5 laboratory asbestos inspection, identified piping along 222-5 facility exterior that has peeling thermal system insulation (TSI) wrapping along elbow. Pipe elbow identified along the 222-5 facility exterior, directly above Zone 7, Riser No. 4.</p> <p>Per TFC-ESHQ-5_IH-C-52 Asbestos Exposure Control and Management, Section 3.2: If the condition of ACM/PACM has deteriorated, corrective action will be identified through established mechanisms of corrective action, such as the Problem Evaluation Request (PER) process.</p>
1/9/2018	WRPS- PER- 2017- 2801	222-5 Pipe on North side of facility with deterioratin g thermal system insulation	<p>During the annual 222-5 laboratory asbestos inspection, it was identified that the asbestos containing thermal system insulation (TSI) wrapping along piping of the north side of the 222-5 facility exterior is not in a good condition and deteriorating from the environmental elements. TSI needs to be repaired or protected from further deterioration.</p> <p>Per TFC-ESHQ-5_IH-C-52 Asbestos Exposure Control and Management, Section 3.2: If the condition of ACM/PACM has deteriorated, corrective action will be identified through established mechanisms of corrective action, such as the Problem Evaluation Request (PER) process.</p>
1/9/2018	WRPS- PER- 2017- 2803	Abandoned 1/4" Mechanical Line in 222-5 Duct level not labelled with asbestos containing material identification	<p>In the 222-5 laboratory duct level, there is abandoned 1/4" mechanical lines (that used to support vacuum actuated equipment that is no longer present). These abandoned 1/4" mechanical lines were filled with asbestos containing material (ACM) to fulfill fire system safety requirements to install a fire proofing material between the shared communication space between multiple floors of the facility.</p> <p>The abandoned 1/4" mechanical lines do not currently have any labeling, or other means of identification, to alert workers that they are filled with ACM/PACM.</p> <p>Per TFC-ESHQ-5_IH-C-52 Asbestos Exposure Control and Management, Section 3.2: If the condition of ACM/PACM has deteriorated, corrective action will be identified through established mechanisms of corrective action, such as the Problem Evaluation Request (PER) process.</p>

1/9/2018	WRPS- PER- 2017- 2817	No Asbestos Signage or Labeling on Pipe Chase Access Hatches in 222-5 Corridors	<p>There is currently no asbestos signage or labeling on the pipe chase access hatches within the 222-5 corridors that contain presumed asbestos containing material (PACM) insulated piping. During a previous work evolution, LAB-WO-11-0387, Attachment A summarized the associated corridor and chase numbers that contain PACM (as visually identified by AHERA building inspectors).</p> <p>Per TFC-ESHQ-5_IH-C-52 Asbestos Exposure Control and Management, Section 3.2: If the condition of ACM/PACM has deteriorated, corrective action will be identified through established mechanisms of corrective action, such as the Problem Evaluation Request (PER) process.</p>
1/10/2018	WRPS- PER- 2018- 0057	Review LEAN Process and when PER Process should be used, specifically for PER 2016 2182	<p>PER 2016-2182 identified a weakness in identification of radiological controls for low rad risk work relating to several events that lead to a common cause for this PER. From that common cause, it was decided to leave the PER process and perform a LEAN event evaluation of the causes. There does not appear to be the same level of formality and verification of completed and effective corrective actions from a LEAN Event process that there is in the PER process. It is not clear if all actions that were identified in the LEAN Event were transitioned into the PER actions. Specifically in the area of compensatory measures and the final expectations for implementation of LOW Rad Risk controls as "skill based" since they are not reflected in repetitive PM work packages or the associated maintenance procedures within those PMs that are applicable to multiple locations and radiological conditions. Modifying all PMs and maintenance procedures for multiple locations to implement low rad risk controls was determined after the common cause analysis was finalized to not be feasible. It is recommended that the common cause analysis issues identified for this PER be compared to the LEAN event that was performed on these common events and determine if there are missing actions or needed compensatory measures that are not being tracked and evaluated from the LEAN event.</p>
1/10/2018	WRPS- PER- 2018- 0055	A comprehens ive assessment required for ETF UV/OX System due to becoming Unreliable	<p>Recently, different issues have caused the ETF UV/OX system to become unreliable. The established approach to keep the system operable is to repair the UV/OX system as it fails. The approach may not be the most effective. The system is over 20 years old. During this period vendor technical support has been sporadic. Vendor ownership changed several times during this period. A comprehensive engineering review of the electrical system is recommended. It also recommended that a maintenance team perform a thorough test and inspection of the UV/OX electrical system. The result of the evaluation may require extensive replacement of UV/OX electrical components.</p> <p>Focus areas for evaluation:</p> <ol style="list-style-type: none"> <li>1. Confirm the current system is electrically compatible, (are the ballasts correct for the new lamps, are the current transmitters correct).</li> <li>2. Consider a test for the current transmitters by requesting the IT's drive each of the loops with proper control signal (i.e. 4-20ma) to determine if there is an issue with low Amp readings.</li> <li>3. Consider testing the system extensively for electrical issues. This would require support to determine the best way to test the lamp electrical draw from their respective circuits.</li> </ol>

1/10/2018	WRPS-PER-2018-0058	Respiratory Protection Equipment at 2704HV with potential bloodborne pathogen exposure	January 9th 2018, a WRPS employee returned their Respiratory Protection Equipment (RPE) to the 2704HV mask issuance station. Upon checking in the equipment, the issuance station noticed a bio hazard - what resembled "vomit". They immediately took the appropriate actions to isolate the area, equipment, and personnel. During further discussions this equipment had been handled by numerous WRPS employees, including Radcon. At no time prior to the RPE being returned did anyone inform the appropriate personnel of the bio hazard, nor were any appropriate actions taken. Procedure TFC-ESHQ-5-STD-24, REV A-7 (BLOODBORNE PATHOGEN EXPOSURE CONTROL STANDARD) should have been entered to prevent exposure to other employees.
1/10/2018	WRPS-PER-2017-2820	Balance Calibration Weight Set Documentation not ISO 17025 Compliant	<p>During a Quality Assurance Surveillance it was discovered that multi-piece balance calibration weight set, Asset Number 702-86-02-089 was not calibrated to the ISO/IEC 17025 standard "General requirements for the competence of testing and calibration laboratories". This weight set was used in 2017 to calibrate balances found in Rooms 4A, 1D, 2H, 2B2, 4B, 4J, 1B, 2B, and 4P. This is a repeat finding from an earlier surveillance (TF-15-QSR-007, WRPS-PER-2015-0204) on analytical balance calibrations at 222-S Laboratory.</p> <p>The Energy Northwest Standards Laboratory (ENSL) Calibration Report issued on January 23, 2017 for weight set 702-86-02-089 can be confusing. It appears to be ISO 17025 compliant because it lists each weight's calibration uncertainty. The reporting of uncertainty is required for an ISO 17025 compliant calibration, however, this Calibration Report also states that "Uncertainty is listed for info. only, not included in the tolerance", thus making this a non ISO 17025 compliant Calibration Report. If a calibration report is ISO 17025 compliant it will not only state the uncertainties, but take them into account in determining if the weights are in-tolerance or not. For a calibration to be ISO 17025 compliant the ENSL Calibration Certificate accompanying each Calibration Report will also state that the Calibration Specification is ISO/IEC 17025:2005 and the Certificate will include the A2LA accredited logo and Certificate #, which it did not in this case.</p> <p>Although weight set 702-86-02-089 was not calibrated to the ISO 17025 standard, the quality of the data produced from balances calibrated with this weight set is not impacted because the weight set was calibrated to the ANSI/NCSL Z540-1-1994 standard and the ENSL calibration program complies with the requirements of 10 CFR50 Appendix B and ASME NQA-1. ISO 17025:2005 is a newer calibration standard that has generally superseded ANSI/NCSL Z540-1-1994.</p>
1/10/2018	WRPS-PER-2018-0059	Waste analysis plans	A search of IDMS, Smart plant and the RCRA Permit was made for the waste analysis plans for the two WRPS operating units that are in the RCRA permit. The results were compared and found to be different. The waste analysis plan for LERF/ETF (WHC-SD-EN-WAP-001 was located both in IDMS and SmartPlant. The waste analysis plan for the 242-A evaporator was located in IDMS but not in SmartPlant. Since the versions of the plans in the RCRA Permit are binding, there could be confusion as to which document should be used and what the specific requirements have to be met. This indicates that there is insufficient configuration control to ensure that the current waste analysis plan is identified and used.

1/10/2018	WRPS- PER- 2018- 0061	PER procedure clarification	<p>PER Procedure Clarification Needed</p> <p>Effectiveness Review Criteria and PER/E-STARs assignments are not consistently generated for performance trends dispositioned as "PER with Resolution" as specified in TFC-ESHQ-Q_C-C-01, "Problem Evaluation Request," and TFC-ESHQ-Q_C-C-06, "Trend Analysis Process." Feedback provided by Cause Analysts indicated the need for additional clarity in TFC-ESHQ-Q_C-C-06 so the expectations are clear. The following enhancements to TFC-ESHQ-Q_C-C-06 will provide the necessary clarification of expectations:</p> <ul style="list-style-type: none"> <li>- Add to Section 4.12, RES - PERs with Resolution, Step 3, language for the Cause Analyst to include effectiveness review success criteria in the cause analysis report for all PERs addressing performance trends with a corresponding action to conduct the effectiveness review.</li> <li>- Add to Attachment E, Cause Evaluation Review Worksheet, an effectiveness review attribute for performance trends categorized as a "PER with Resolution" similar to the attribute for Root Cause Analysis.</li> </ul> <p>Individual issues are being addressed and PERs will be generated as necessary. A review is conducted each quarter for missing effectiveness review criteria and assignments quarterly during the Trend Report development as part of that process with a status included in the report for each trend.</p> <p>Recommend this PER be categorized as a PIE/CIM for the procedure enhancement.</p>
1/10/2018	WRPS- PER- 2017- 2887	ERO Drill PER (inconsistent wording)	<p>EP-PE 9.15 Classification</p> <p>On December 6th 2017, Emergency Preparedness conducted a Field Drill that included Tank Farm ERO personnel and a simulated fuel truck accident with fuel leaking into a Catch Tank (EM-PO-ICP-2017-12-01). During the course of the drill the evaluation team identified the following suggestion:</p> <p>RLEP 1.0 - Appendix 1-2.A 200 Area Tank Waste Table 1E. Waste Tank Transients/Ventilation Upset - Fire/Explosion/Deflagration ALERT EAL Initiating Condition wording is not currently consistent with the SAE Initiating Condition wording in the same Table and does not include examples of what is considered to be a "Waste Tank".</p>
1/10/2018	WRPS- PER- 2017- 2907	ERO Drill PER (U-Farm Catch Tanks)	<p>EP-PE 2.13 Program Responsibilities</p> <p>On December 6th 2017, Emergency Preparedness conducted a Field Drill that included Tank Farm ERO personnel and a simulated fuel truck accident with fuel leaking into a Catch Tank (EM-PO-ICP-2017-12-01). During the course of the drill the evaluation team identified the following suggestion:</p> <p>RPP-13329 Table 3-1 Hazard Categorization for the Tank Farm facilities is used by the BED to assist in determining if a facility, building or storage area is listed as hazardous when determining if EAL criteria has been met during an emergency event. The U Farm Catch Tank identified during the drill is not currently included in the Table 3-1 list of facilities.</p>

1/10/2018	WRPS-PER-2017-2908	ERO Drill PER (binder tabs)	<p>EP-PE 8.15 Equipment (RESPONSE)</p> <p>On December 6th 2017, Emergency Preparedness conducted a Field Drill that included Tank Farm ERO personnel and a simulated fuel truck accident with fuel leaking into a Catch Tank (EM-PO-ICP-2017-12-01). During the course of the drill the evaluation team identified the following suggestion:</p> <p>Divider tabs in ERO binders are worn and unreadable resulting in difficulties rapidly identifying and finding needed ERO checklists and Emergency Response Procedures.</p>
1/10/2018	WRPS-PER-2018-0068	Soil Contamination Outside a Posted SCA	<p>*** Compliance Issue - Soil Contamination Outside a Posted SCA ***</p> <p>At approximately 9:30am this morning, while performing the monthly routine perimeter survey of B-Farm, The HPT identified (3) spots of contamination on the West fence line to the South of the B-Farm change trailer. All (3) spots were approximately the size of 2360 probe (100cm<sup>2</sup>), they were all separated by several feet of distance, and they all appeared to be tumbleweed fragments. Additionally, it appeared as if the accumulated tumbleweeds had been recently collected from this fence line. The spots on the West fence line readings were as follows 31,360dpm/100cm<sup>2</sup>, 34,350dpm/100cm<sup>2</sup>, and 80,000dpm/100cm<sup>2</sup> of contamination. No alpha contamination was identified on any of the spots, and all the readings were direct readings with the dirt/tumbleweed mixture on the ground.</p>
1/10/2018	WRPS-PER-2018-0065	TFC-ENG-DESIGN-P-12 and TFC-ENG-DESIGN-P-59 refer to the same test procedures by different names.	<p>FY2017-ENG-M-130 management assessment was performed to evaluate the development of the Requirement Traceability Matrix (RTM) and Test Requirement Matrix (TRM) for software development.</p> <p>The assessment resulted in one finding and five observations.</p> <p>Observation 3BFC-ENG-DESIGN-P-12 and TFC-ENG-DESIGN-P-59 refer to the same test procedures by different names. There is a note added to TFC-ENG-DESIGN-P-12 to address this issue, however the use of two different names in different procedures, Software Test Procedures and Acceptance Test Procedures could cause confusion.</p>

1/10/2018	WRPS- PER- 2018- 0062	No procedure specifically addressed offline software testing and how it would be tracked and conducted	<p>FY2017-ENG-M-130 management assessment was performed to evaluate the development of the Requirement Traceability Matrix (RTM) and Test Requirement Matrix (TRM) for software development.</p> <p>The assessment resulted in one finding and five observations.</p> <p>Finding One:</p> <p>No procedure specifically addressed offline software testing and how it would be tracked and conducted. From interviews, offline testing of the requirements outlined in the Requirements Traceability Matrix (RTM) is an essential step and the results are recorded in an Acceptance Test Report. Requirements that cannot be tested offline are included in the Test Requirements Matrix (TRM) and tested as part of the OAT.</p>
1/10/2018	WRPS- PER- 2018- 0063	procedures does not specify how to create a RTM nor provide a template to follow	<p>FY2017-ENG-M-130 management assessment was performed to evaluate the development of the Requirement Traceability Matrix (RTM) and Test Requirement Matrix (TRM) for software development.</p> <p>The assessment resulted in one finding and five observations.</p> <p>Observation One:</p> <p>TFC-ENG-DESIGN-P-12 specifies when a Requirements Traceability Matrix (RTM) is required and that its contents should be generated from the Software Requirements Specification (SRS). The procedures does not specify how to create a RTM nor provide a template to follow. The requirements for the RTM are found in TFC-ENG-DESIGN-P-59, again no template is provided.</p>
1/10/2018	WRPS- PER- 2018- 0064	no direct link in any procedure reviewed during this assessment that connects the Requirements Traceability Matrix (RTM) to t	<p>FY2017-ENG-M-130 management assessment was performed to evaluate the development of the Requirement Traceability Matrix (RTM) and Test Requirement Matrix (TRM) for software development.</p> <p>The assessment resulted in one finding and five observations.</p> <p>Observation 2BFC-PRJ-SUT-C-01 provides a list of acceptable sources for the Test Requirement Matrix (TRM) and specifies the Software Requirement Specification (SRS) as a source. There is however no direct link in any procedure reviewed during this assessment that connects the Requirements Traceability Matrix (RTM) to the TRM. From the interview with the Process and Control System Engineering Manager, the intent is to have the RTM included in the TRM. This assessment recommends all software testing requirements be included in the TRM, including requirements tested offline.</p>

1/10/2018	WRPS- PER- 2018- 0066	A Design Requirements Compliance Matrix (DRCM) is generated during the conceptual design phase of most projects but is not us	<p>FY2017-ENG-M-130 management assessment was performed to evaluate the development of the Requirement Traceability Matrix (RTM) and Test Requirement Matrix (TRM) for software development.</p> <p>The assessment resulted in one finding and five observations.</p> <p>Observation 4# Design Requirements Compliance Matrix (DRCM) is generated during the conceptual design phase of most projects but is not used in software development. The DRCM is a project level tool used to verify requirements have been met. From interviews it was learned that the Test Requirements Matrix (TRM) is a subset of the DRCM that requires testing.</p>
1/10/2018	WRPS- PER- 2018- 0067	evaluate the development of the Requirement Traceability Matrix (RTM) and Test Requirement Matrix (TRM) for software developm	<p>FY2017-ENG-M-130 management assessment was performed to evaluate the development of the Requirement Traceability Matrix (RTM) and Test Requirement Matrix (TRM) for software development.</p> <p>The assessment resulted in one finding and five observations.</p> <p>Observation 5# Flowchart (Attachment 2) was generated during this assessment. It is recommended that this flowchart or a similar one be included in TFC-ENG-DESIGN-P-12 to provide a high level overview of the software requirement tracking process.</p>
1/10/2018	WRPS- PER- 2018- 0069	A-6007-210, Rev. 1, Checker Log For System Models	<p>Form A-6007-210, Rev. 1, Checker Log For System Models, (referenced in TFC-ESHQ-ENV_FS-C-05, Rev. A-1, WRPS Environmental Model Calculation Preparation and Issue procedure) needs clarifications. For Document Control purpose the form should include the document number/title that was subject of the checking and the date when the checking was performed. A second form: A-6006-716, Rev.1, Environmental Model Calculation Cover Page, (referenced in the same procedure), includes both: a date and calculation number.</p>

1/10/2018	WRPS- PER- 2018- 0015	assessor noted that an Engineering Management Assessment FY2017-ENG-M-0130 was performed as scheduled but PERs were not issued	During a review associated with Independent Assessment FY2018-WRPS-I-0004, Tank Farm Commissioning: Test Controls and Turnover, an assessor noted that an Engineering Management Assessment FY2017-ENG-M-0130 was performed as scheduled but PERs were not issued for the Assessment.  The assessment identified findings and observations but did not identify PER numbers. A search of the PER data-base found no PERs issued for the assessment.
1/11/2018	WRPS- PER- 2018- 0070	There is a conflict between Procedure ETF-30-005 (SOE Rounds) and TFC-OPS-OPER-C-60 (Surveillance Rounds).	There is a conflict between Procedure ETF-30-005 (SOE Rounds) and TFC-OPS-OPER-C-60 (Surveillance Rounds). TFC-OPS-OPER-C-60 is supposed to be the standard that we conduct our rounds too. It addresses the standards for O/S, OFF, N/A, ETC. The SOE rounds procedure ETF-30-005 has no reference to N/A even though TFC-OPS-OPER-C-60 (Surveillance Rounds) is supposed to be our standard and gives us clear direction on how to use N/A.
1/11/2018	WRPS- PER- 2018- 0071	(b)(6) trying to pump water uphill	(b)(6) trying to pump water uphill into AX-03B pit using the suction side of the pump. (b)(6) consider this to be "Skill of the Craft", No labels, procedure and obviously no training on how a pump works is required. The skid or water buggy has two places to connect a water hose, one is gravity drain on suction side and one on discharge side (b)(6) choose wrong one and workers in the field were waiting until problem was resolved.

1/11/2018	WRPS-PER-2018-0072	WRPS Subcontract or ALSU completing OSH & NIOSH work methods without supporting documentation	WRPS subcontract laboratory ALS Salt Lake City (ALSU) currently performs the analysis of hexavalent chromium in air by the OSHA ID-215 and NIOSH 7605 methods and the analysis of formaldehyde in air by the NIOSH 2016 method. The results generated from these analyses are used by either the Environmental Protection Group for regulatory environmental air monitoring or the Industrial Hygiene Group for worker health and safety oversight, and because of this any laboratories under subcontract must be in compliance with the DOE/RL-96-68, ISO/IEC 17025:2005 (via AIHA-LAP requirements), and QSM, Version 5.1 requirements documents. During a review of ALSU Workorders 34-1725515 (Group 20173084 AP Stack hexavalent chromium in air) and 34-1723616 (Group 20172969 AP Stack formaldehyde in air) it was discovered that the OSHA and NIOSH methods referenced in the data packages are being used with modifications and deviations with no supporting documentation or notifications provided to the client.
1/11/2018	WRPS-PER-2018-0073	LERF Basin 43 Increased Leachate Rate	<p>Title: LERF Basin 43 Increased Leachate Rate</p> <p>Beginning November 3rd, 2017 ETF began transferring contents from LERF basin 42 to Basin 43. Basin 43 had been emptied in June of 2017 to allow replacement of the basin cover. Following basin 43 cover replacement, the transfer began to empty basin 42 to basin 43 for cover replacement of basin 42. During the transfer it was discovered the basin 43 leachate collection system was experiencing rising levels.</p> <p>The electronic level detector for the basin 43 leachate collection system was calibrated using an installed dip tube system as a reference. The electronic level detector was found to be out of calibration. The electronic detector was re-calibrated and checked the following day only to find the level indicator was again out of tolerance. Several subsequent calibration efforts failed to achieve stable, accurate readings. As a result, an alternative level monitoring system was established and the electronic level detector was determined to be unreliable. It is uncertain how long the level indicator was unreliable. This led to uncertainty of knowing the highest leachate level reached and the actual daily basin 43 leachate rate during the period the level indicator was unreliable.</p> <p>As expected, due to the unknown high basin 43 leachate level, initial basin 43 leachate pumping rates were higher than the allowable leachate rate of 2100 gallons/acre-day. Once the initial leachate sump liquid was removed and the pump could be operated intermittently, the actual leachate rate of basin 43 could be measured. The leachate rate began to quickly drop below the allowable limit and appears to be reaching a stabilization point. This stabilized leachate rate through the primary liner is considerably higher than the historical leachate rates at basin 43 and represents a trend that may have impacts to LERF Operations.</p>
1/11/2018	WRPS-PER-2018-0074	Roof leak reported outside the AMU room east door.	Roof leak reported outside the AMU room east door.

1/11/2018	WRPS- PER- 2018- 0075	Released work package required prior to being placed into Working	I was notified via e-mail of a Project Turnover Document for the 222-S Restroom Shower Trailer (T1P174) that completion signatures would be gathered in the near future. The Turnover document referenced work package 351053. When I looked up the work package in EAM, the status of the work package was "Ready For Work" and it's currently "Working" in the field. When the work package was released by Operations at 222-S, the status was never changed to "Working" as required per procedure TFC-OPS-MAINT-C-01 step 4.5.5.c.
1/11/2018	WRPS- PER- 2018- 0077	Gerorgia Buggie	During a surveillance a Gerorgia Buggie was discovered in AX Farm, without proper safety and operational decals creating a safety hazard for the operation of the Georgia Buggie. The WRPS training department was contacted to verify if the safety decals and warnings are a pre-use requirement and it was discovered that there is not a training requirement or pre-use checklist in place.
1/11/2018	WRPS- PER- 2018- 0078	Inspection Audit No. 1207	<p>The Washington Department of Health (WDOH), Radioactive Air Emission Section (RAES) delivered to WRPS and DOE-ORP an Inspection Close Out Letter, AIR 18-103, dated 01/08/2018, for Inspection Audit No. 1207, conducted in September, 2017. The WDOH Close Out Letter identified an issue concerning the operating Conditions currently contained in the Hanford Air Operating Permit, Radioactive Air Emission License - No. FF-01 (the License) for this Emission Unit, EU ID 1294, Stack No. 296-A-21A, 242-A Evaporator.</p> <p>The issue identified by the WDOH Close Out Letter states, "The License contains Construction Conditions that no longer apply to an operating Emission Unit. It is recommended that the License should be updated to more specifically list License Operating Conditions without Construction Conditions."</p> <p>The Close Out letter did not identify any additional issues, concerns or non-compliance. The Close Out Letter did not establish any specific conditions or close-out dates for the recommended changes/updates. The Inspection Audit is closed upon the receipt of the Close-Out Letter. The update of the License will occur at a later date.</p>

1/11/2018	WRP5- PER- 2018- 0080	BY parking area	Government vehicle backed into utility pole while trying exit BY parking area.
1/11/2018	WRP5- PER- 2018- 0083	Panel DP-1 in 6241-V was incorrectly identified as PP-1 on H-6- 14012 sheet 2 zone C-6/7	Panel DP-1 in 6241-V was incorrectly identified as PP-1 on H-6-14012 sheet 2 zone C-6/7. Panel is physically labeled "DP-1" in the field. Drawing is out of compliance for configuration control.
1/11/2018	WRP5- PER- 2018- 0085	Administrati ve procedure requirement was not followed	Administrative procedure requirement was not followed. The design package for a splitter manifold involving lifting attachment design and rigging hardware was not reviewed or approved by a Qualified Rigging Engineer in accordance with procedure TFC-ENG-DESIGN-C-52, Technical Reviews.

1/11/2018	WRPS-PER-2018-0051	POR 06 (296-P-45) experienced an unplanned shutdown on or after 12/22/2017	POR 06 (296-P-45) experienced an unplanned shutdown on or after 12/22/2017 due to a high seal pot liquid level alarm.
1/13/2018	WRPS-PER-2018-0086	MO266/Room 3 Roof Leak	MO266/Room 3 is showing signs of water intrusion from a roof leak. During recent rains water was pooling in the southeastern corner of the building causing damage to the ceiling, wall and floor. In addition to the damage caused moldy/mildew odor has been caused. Currently the room is uninhabitable. (See attached photos).
1/14/2018	WRPS-PER-2018-0087	Management Directive TFC-MD-134 Conflicts With Implementation Procedures	<p>Management Directive TFC-MD-134 "Personal Time Bank and Other Absences" was issued on January 8, 2018 to "provide clarification of the recent changes to the administration of holiday time recording for WRPS, LLC exempt and salaried non-exempt employees. Upon review of implementing procedure TFC-BSM-HR_AT-C-03 (same title as TFC-MD-134) it was discovered that no changes to the administration of holiday time recording has been made.</p> <p>Received email from (b)(6) dated Tuesday, January 09, 2018 instructing exempt employees who worked on January 1, 2018 to change their timecards from HWP to FCW or PTW in accordance with a management directive TFC-MD-134, Rev A-0, Personal Time Bank and Other Absences. This directive was issued on January 8, 2018 to clarify the recent changes to the administration of holiday time recording. A comparison of the contents of management directive TFC-MD-134, Rev A-0 with the implementing procedure TFC-BSM-HR_AT-C-03, Rev C-8 (issued on January 3, 2018), Personal Time Bank and Other Absences and with Employee Message dated December 7, 2017 concerning proposed changes to holiday time reporting for exempt staff revealed several conflicting requirements and/or inconsistencies. Specifically:</p> <ul style="list-style-type: none"> <li>• The procedure instructs exempt personnel to charge hours worked on a holiday to HWP while the management directive states that hours worked on a holiday will be charged to FCW.</li> <li>• The procedure states that exempt personnel will be paid 2 ½ times the base hourly rate (no change from previous policy) while the management directive states that employees will be paid 1 ½ times the base hourly rate for hours worked on a holiday.</li> <li>• The management directive states, "The attendance code "PTW" will be used for employees (does not specify employee classification) authorized to work on a designated facility closure day..." while the procedure states, "The attendance code "PTW" will be used for bargaining unit employees (not by exempt employees)..."</li> <li>• The Employee Message sent out on 12/7/17 said that "beginning Jan. 1, holiday pay will be accrued throughout the year as Personal Time Bank (PTB) hours, with exempt and salaried non-exempt employees accruing 80 hours of holiday pay over the course of a calendar year. The 80 hours will be included in the employee's PTB account (accrued at a rate of 3.076 hours per two-week pay period) in addition to the amount of PTB each employee currently accrues based on individual service record." However, Attachment A of TFC-BSM-HR_AT-C-03 accrual rates have not been changed.</li> <li>• It should also be noted that having a management directive and a procedure with the same title (Personal Time Bank and Other Absences) is unusual. Typically, each document is given a unique title.</li> </ul> <p>Additionally, review of implementing procedure TFC-BSM-HR_AT-C-04, Rev B-4, Exempt Overtime and Shift Differential and On Call Process found that it agrees with TFC-BSM-HR_AT-C-03 and, as such, is in conflict with TFC-MD-134. It should be noted that TFC-BSM-HR_AT-C-04 is listed in TFC-PLN-100, Tank Operations Contractor Requirement Basis Document Table as the implementing document for requirement "1.33, FAR 52.222-2, Payment for Overtime Premiums (Jul 1990)."</p>

1/14/2018	WRPS-PER-2018-0088	ETF contamination found outside 2025 ED facility	2025ED exterior area where 59A-P-103A & 59A-P-103B pumps are located was not being controlled for possible contamination. During routine Survey Tasks being performed by Shift HPT, transferable and fixed contamination was discovered at levels >100K dpm/100cm2 Beta-Gamma; which led to posting of a 6'x10' area as a High Contamination Area (HCA) pending decontamination efforts. We need to evaluate maintaining this specified area as an RBA even if decontamination efforts remove all material of concern as these pumps are used on a routine basis to off-load tankers and historically there have been situations where breaches have been discovered. The area is a Secondary Containment with SPC coated flooring that is sloped to a common drain that drains to a recessed SUMP...so the RBA could be relegated to this area and maintain the common grated area free of RBA status.
1/15/2018	WRPS-PER-2018-0089	Effectiveness Review (ER) associated with WRPS-PER-2016-1317	<p>During a review of the draft Effectiveness Review (ER) associated with WRPS-PER-2016-1317, it was noted that a few enhancements with the corrective actions are warranted before conducting an ER. An Effectiveness Review (ER) is required for all Significant PER's as described in TFC-ESHQ-Q_C-C-01, Attachment 1. The purpose of an ER is to determine whether the corrective actions taken have addressed the cause(s) of the issue, correct the issue, and improved performance to acceptable levels.</p> <p>While looking at a draft ER for PER-2016-1317, "Employee Fell off Stair Landing at MO-284 Causing Multiple Injuries" as well as the deliverable associated with corrective actions, a few observations were noted. First and foremost, it should be recognized that the actions taken in the field after the incident occurred must have been effective at preventing re-occurrence of this nature due to this issue not having occurred since then. To support this, a field walk down was performed to look at a random number of mobile trailer structures with removable guardrails. The results of the review found that every structure looked at were securely pinned to prevent inadvertent removal without clear intent to do so.</p> <p>Secondly, a significant amount of stairs were removed and replaced with metal structures by Construction Forces. These structures were located inside radiological zones and provide a means of egress into and out of the Farms. Additionally, 19 structures were repaired by Plant Forces after inspections revealed a need to perform repairs to ensure that they were safe for continued use.</p> <p>While the efforts in the field related to the corrective actions effectively identified and mitigated the immediate issue, the documentation is not as clear and concise as they should be. For this reason, this PER is being launched (rather than add to the existing PER) to identify those issues and track corrective actions to ensure documentation is properly synchronized. However, this PER should also be linked to PER-2016-1317 for documentation purposes.</p> <p>Observations: Root Cause RC01 states "A single point of failure exists during the construction and/or corrective maintenance of stairs, rails, and platforms at Tank Farms due to a long standing process of conducting the work without detailed work instructions, including applicable design criteria and acceptance inspection criteria following construction/corrective maintenance completion. The work has been completed historically using level 3 work package or skill of the craft verbal instructions". From the Root Cause, several corrective actions were launched. RC01-01 (2016-1317.1) asked for a process to be institutionalized. Institutionalization of a process generally includes the development of a procedure, guidance or plan which describes how to manage a program or process. The documented deliverable for 2016-1317.1 was an un-worked level 3 work order (274260) for General Purpose Facilities (Outside Tank Farms or Operational Facility) and a blank checklist (Attachment 1) used with the level 3 work order. Since a level 3 is only good for 1 year from the time the package is released for work, it is difficult to say that this level 3 "institutionalizes" the process. While this satisfies the closure of the action, a more rigorous process should be considered that includes a plan to replace all of these (with removable guard rails) wooden structures with metal, pre-engineered type structures that are weather resistant and provide longer lasting usability.</p> <p>RC01-02 (2016-1317.2) asks for criteria to be developed by Engineering and Safety that meets safety standards and code compliance. The documented deliverable by engineering for 2016-1317.2 were several PM's with a table that included 9 inspection criteria and data sheets for each area that has applicable elevated structures. The intent is that the inspectors would use the table as the criteria and document in the results of the inspection on the corresponding data sheet.</p> <p>When dry running this PM, it was not easy to determine how the user would document some observations. As an example, 27045 has 4 structures. North, South, East and West. For each structure, the inspector documents "Sat or Fail" depending on meeting the criteria described in Table 1. Criteria 1 of Table 1 states "Condition of Paint and Nonskid Coatings". This is not a yes or no answer nor is it a description of what is expected, but instead, is an open ended statement. This makes it nearly impossible for the inspector to perform the inspection without seeking guidance.</p>
1/16/2018	WRPS-PER-2018-0090	Management Directed RPF	<p>Manager brought to my attention that the current MD RPF Task 2 and Task 3 refer to the "Agreement between HAMTC and WRPS" as the reason for Supplied air in Double and Single shell farms.</p> <p>The new Standing Order SO-OPS-17-003 3 Effective date 12/11/2017 "...requires wearing mandatory supplied air for all work inside the perimeter fences of any Tank Farm with the exception of work that meets the requirements of TFC-PLN-172 or TFC-PLN-173."</p> <p>Should the Management Directive be change to reflect the Standing order requirement now and not the HAMTC/WRPS agreement?</p>

1/16/2018	WRPS- PER- 2018- 0091	Druck Pressure Calibrator, S/N 6102139011 , Model DPI610, (M&TE #820- 35-40-014) "As Found" reading during calibration was Out-	Druck Pressure Calibrator, S/N 6102139011, Model DPI610, (M&TE #820-35-40-014) "As Found" reading during calibration was Out-Of-Tolerance. It was adjusted to manufacturer spec.
1/16/2018	WRPS- PER- 2018- 0076	RMA WRPS- RMA-152 had Storage Carts that require Radioactive Tag or Label when stored in RMA	Three manipulator storage carts were found without a radioactive materials tag or label by a Radioactive Material Area (RMA) Custodian performing a monthly walk-through/inspection of RMA WRPS-RMA-152. This RMA is located in building 2716-S. In each case the unlabeled carts were stored in a posted RMA. An evaluation to determine why this issue may have occurred, identified that the normal operation is to label the manipulator, however this results in an unlabeled cart when the manipulator is removed. An extent of condition evaluation performed on the remaining manipulator carts identified several with the manipulator labeled but the cart not labeled. To correct this issue, each manipulator and cart now has its own radioactive material label.
1/16/2018	WRPS- PER- 2018- 0093	2025 E facility and found 2 dead mice in a trap located in Room 101 (which is a Non- Radiological area).	Animal control personnel were checking mouse traps in the 2025 E facility and found 2 dead mice in a trap located in Room 101 (which is a Non-Radiological area).  An HPT surveyed the dead mice and found the following contaminations:  Mouse # 1: 9,850 dpm/100 cm2 Beta-Gamma and 7 dpm/100 cm2 Alpha Total Contamination.  Mouse # 2: No contamination was detected.  Surveys are documented in Survey Simple on RSR # LE-1800089.

1/16/2018	WRPS- PER- 2018- 0082	TAPs sampling of dimethyl mercury and chromium hexavalent was missed	Under section 3.3 DE11NWP-00, the annual TAPs sampling of dimethyl mercury and chromium hexavalent was missed in 2017 for exhauster 296-A-42.
1/16/2018	WRPS- PER- 2018- 0097	Unplanned shutdown of the 242-A K- 1 building exhauster	Unplanned shutdown of the 242-A K-1 building exhauster.
1/16/2018	WRPS- PER- 2018- 0098	Unplanned shutdown of the SY annulus exhauster	Unplanned shutdown of the SY annulus exhauster possibly due to heavy fog.

1/16/2018	WRPS- PER- 2018- 0099	Unplanned shutdown of AN exhauster 296-A-44.	Unplanned shutdown of AN exhauster 296-A-44.
1/16/2018	WRPS- PER- 2018- 0100	Sewage tank at Building MO-596 overflowed to the ground due to a continuously flushing toilet.	Sewage tank at Building MO-596 overflowed to the ground due to a continuously flushing toilet.
1/16/2018	WRPS- PER- 2018- 0096	Central Shift Office reported one of the three annulus Enrafs in AY-102 was not operable.	Central Shift Office reported one of the three annulus Enrafs in AY-102 was not operable. The other two Enrafs were reporting normally and there was no level rise observed. Operations is planning to restore the malfunctioning Enraf.

1/16/2018	WRPS- PER- 2018- 0094	Unplanned shutdowns of POR-126 and POR-127	<p>Unplanned shutdowns of following AX Exhausters:</p> <p>POR-126 (296-P-49) on December 30, 2017 at 0331 hours due to a high vacuum interlock.</p> <p>POR-126 (296-P-49) again on January 12, 2018 at 1004 hours for unknown reason.</p> <p>POR-127 (296-P-50) on January 1, 2018 at 0108 hours due to high differential pressure across the HEPA filters.</p>
1/16/2018	WRPS- PER- 2018- 0061	Enterprise Asset Management (HISI 3477) appears to have lost configuration control.	<p>Enterprise Asset Management (HISI 3477) appears to have lost configuration control. The system SCR EAM-3477-50 was implemented outside the approved Change Control process defined in the software management plan (RPP-55846).</p> <p>Enterprise Asset Management (EAM) is the work management software application used at WRPS (TFC-OPS-MAINT-C-01, REV R-12) and as such must be maintained under appropriate configuration control.</p> <p>The current software management plan (RPP-55846) states SCRs will serve as an extension to the original baseline system requirements. In HISI, the Version Description Document (VDD) will be updated for each new release of the application. The SCR (EAM-3477-50) was implemented and described as an Ad Hoc change (definition unclear) with no record or approvals in the HISI VDD in conflict with the defined process.</p> <p>Per the configuration management plan in RPP-55846, even very minor changes should be controlled and documented by a version numbering scheme. RPP-55846, Section 2.6.1 states: "The EAM system version numbering scheme follows the convention of 1.0 for major versions and 1.01 for sub-versions and possibly 1.01.01 for very minor version changes".</p>
1/17/2018	WRPS- PER- 2018- 0101	Emergency Response training class an individual brought up a few concerns	<p>During a recent Emergency Response training class an individual brought up a few concerns about possible gaps in the site emergency response process. Individual was concerned that the class was teaching individuals that after the 911 call was made to immediately call the Central Shift Office thus not allowing the individual to stay on the phone with 911 to continue to assistance until response arrived. Also the individual had concerns that the current DOE RLEP procedures have the individuals that made the emergency call stay outside in a safe location even though the site sirens may be going off and current HGET training does not address this process.</p>

1/17/2018	WRPS-PER-2018-0084	Habitability in ICP not completed during EP Drill for Radiological Release	<p>On 12/14/2017, WRPS Security and Emergency Services (SES) conducted an emergency preparedness drill to evaluate the emergency response actions involving a radiological release event that impacted the WRPS 222-5 Laboratory buildings/facilities. During the course of the drill, the evaluation team identified the following "Suggestion" which pertains to EP-Program Element 12 "Protective Actions"</p> <p>Habitability in the ICP was assumed to be completed and was not ensured by the ERO as having been performed (P/E 12.15)</p>
1/17/2018	WRPS-PER-2018-0102	AR204-IA-CMP-002 204-AR BACK-UP AIR COMPRESSOR POWER SWITCH NOT LABELED	<p>In 204AR the switch "AR204-IA-CMP-002 204-AR BACK-UP AIR COMPRESSOR POWER SWITCH" is not clearly labeled. Switch is located in 209-A COMPRESSOR BLDG.</p>
1/17/2018	WRPS-PER-2018-0079	702AZ ventilation system has issues with consistency between software, P&IDs, PMs, Alarm Set point	<p>The 702AZ ventilation system currently has issues with consistency between software, P&amp;IDs, PMs, Alarm Set point.</p> <p>This issue has, for the past four years been worked piecemeal, spread over three different PERs (WRPS-PER-2017-2113, WRPS-PER-2017-2465, and WRPS-PER-2014-2140).</p> <p>These PERs are open under three different responsible managers with actions that, while adequate for the individual elements, do not ensure the overall problems are addressed.</p> <p>Met with affected organizations to determine appropriate approach. It was determined that the issue would best be resolved with a comprehensive plan managed on a single PER that could coordinate the upgrades to the 702AZ software, with the issuance of a revised and verified set point basis document (HNF-1529), necessary changes to the 702AZ drawing package and the impacted PMs.</p>

1/17/2018	WRPS- PER- 2018- 0104	No map with RSR (S-1705457) for medium risk RWPs per TFC-ESHQ-RP_ADM-09, 4.3.15	Radiological Survey Report (RSR) S-1705457 followed Radiological Work Permit (RWP) S-822 Rev. 008, which is classified as a medium risk RWP, medium risk RWPs require the RSR to have a map on them. Requirement comes from DOCUMENTATION OF RADIOLOGICAL SURVEYS TFC-ESHQ-RP_ADM-09, 4.3.15.
1/17/2018	WRPS- PER- 2018- 0105	Radiological Control Vehicle Survey plan to survey a Gater	Radiological Survey Report (RSR) BOAN-1700285 states that it used RCV-SP-003 for Radiological Control Vehicle Survey plan to survey a Gater (#HO-171-05661). The survey plan requires items surveyed per plan to be noted on the RSR as line items, in the comments section or on the map. This survey states one line item as the gator and not any items surveyed as required per the descriptions of the plan.
1/17/2018	WRPS- PER- 2018- 0106	(RSR) BORT-1701713 uses less than D/LAW	Radiological Survey Report (RSR) BORT-1701713 uses less than D/LAW in the contamination measurement section. When using less than D it is required to make comments as per DOCUMENTATION OF RADIOLOGICAL SURVEYS TFC-ESHQ-RP_ADM-09, 4.3.11 (e.g. count time (seconds) or scan speed (inches/second), distance from the swipe (inches or cm), percentage of item swiped, area swiped, no observable/audible counts above background (i.e., less than D)).

1/17/2018	WRPS- PER- 2018- 0107	(RSR) COR-1702864 followed Radiological Work Permit (RWP) CO-874	Radiological Survey Report (RSR) COR-1702864 followed Radiological Work Permit (RWP) CO-874 Rev. 002, which is classified as a medium risk RWP, medium risk RWPs require the RSR to have a map on them. Requirement comes from DOCUMENTATION OF RADIOLOGICAL SURVEYS TFC-ESHQ-RP_ADM-09, 4.3.15.
1/17/2018	WRPS- PER- 2018- 0108	(RSR) BO616-1700178 lists the Radiological Work Permit (RWP) as TF-117	Radiological Survey Report (RSR) BO616-1700178 lists the Radiological Work Permit (RWP) as TF-117 Rev. 003, the Rev. should be 013. Radiological Survey Report (RSR) BOAN-1700285 lists the Radiological Work Permit (RWP) as TF-102 Rev. 021, the Rev. should be 033.
1/17/2018	WRPS- PER- 2018- 0109	(RSR) BOEV-1700276 lists alpha contamination measurements	Radiological Survey Report (RSR) BOEV-1700276 lists alpha contamination measurements but the RSR fails to list an instrument capable of taking alpha measurements.

1/17/2018	WRPS- PER- 2018- 0110	(RSR) LE- 1702608 lists using release survey plan PO-RSP- 2016-018 for release of the Druck	Radiological Survey Report (RSR) LE-1702608 lists using release survey plan PO-RSP-2016-018 for release of the Druck during a job evolution. The release plan calls for a technical smear, yet a technical smear that links up to this action is missing in the contamination measurements section.
1/17/2018	WRPS- PER- 2018- 0111	(RSR) LE- 1702398 lists Transferable instead of LAWs	Radiological Survey Report (RSR) LE-1702398 lists Transferable instead of LAWs on line C7 in the contamination measurements section and consequently on the survey map on page six of eight. Transferable type surveys are to be used only in dirt and not on hardened surfaces.
1/17/2018	WRPS- PER- 2018- 0112	(RSR) WTP- 1701220 lists the Radiological Work Permit (RWP) as WTP-0381	Radiological Survey Report (RSR) WTP-1701220 lists the Radiological Work Permit (RWP) as WTP-0381 Rev. 006, the Rev. should be 008.

1/17/2018	WRPS- PER- 2018- 0103	Clothing Contaminati on Event Number PEC- 2018-001	Clothing Contamination Event Number PEC-2018-001 (b)(6) working in a posted CA/RA at AX tank farm on RWP AX-052, and wearing a SCBA, was found to be contaminated on his personal effects sweatshirt hood. Measured contamination level was 20,000 dpm/100 cm <sup>2</sup> Beta/Gamma and No Alpha. Contamination was located in approximately a one GM probe area (~15.5 sq. cm). Contamination was on top of the sweatshirt hood and was not in contact with the skin. Contamination on the sweatshirt hood was identified during SCBA mask and head surveys required during SCBA Bottle Change Out.
1/17/2018	WRPS- PER- 2018- 0113	EAPC inspection noticed safety shower issues similar to PER 2014- 0286 screened as TUF	During the EAPC inspection a new team member questioned the safety shower in room 2B asking why is there a strap attached to handle. Also taking a closer look discovered the pull handle had an open loop attaching to the valve that if pushing up to close would detach from valve and could allow valve to stay open. We noted that on inspection report, but I was concerned this one had not been replaced and followed up today looking at all other permanently installed safety showers in the multi curie section of lab and discovered none of the handles, valves or shower heads had been replaced as in the front portion of laboratory (there are only three more). Some of the pictures attached here were in my original PER 2014-0286 screened as TUF with concern of valves being questionable and breaking handles. You can see the aluminum handle a homemade replacement was installed due to some reason years ago. Others have very significantly bent valve handles and attached ropes have become a single strand instead of open bow, a certain distance to allow easy grasping and actuation if needed. The out of service Safety showers were being cannibalized for parts since these are no longer made and parts are unavailable. If only three were bad then why were six changed out and what about the others with identified deficiencies that were questionable. why only the front portion of laboratory and not the rest? what criteria was utilized? If the others were to be changed out where is this documented and where are we tracking?
1/17/2018	WRPS- PER- 2018- 0114	AVO Tool & Appliance Tester, Model # 235303, Serial # 9460	AVO Tool & Appliance Tester, Model # 235303, Serial # 9460 (M&TE # 820-77-47-001) "As Found" reading during calibration was Out-Of-Tolerance. It was adjusted to manufacturer spec.

1/17/2018	WRPS-PER-2018-0115	APQ and CES calculation procedures not updated to reflect specific activity and DE-CI/g Matching tank farms	<p>During the rebaselining activity for the Annual Possession Quantity (APQ), Laboratory engineering identified an issue with the procedural guidance for the APQ and CES calculations not being in sync with changes made earlier in the year for the MARS system.</p> <p>Lab engineering had concurred previously to change the factors used in the calculation (Specific activity and De-CI/g) to match tank farms best basis inventory. Those changes were made in the system but did not get documented in the procedure.</p>
1/17/2018	WRPS-PER-2018-0116	Monthly GFCI inspections per WO# 377160	<p>While performing the monthly GFCI inspections per WO# 377160 on 01/16/18 it was discovered that 2 of the GFCI's did not operate correctly. Per procedure 3-EDS-180 the GFCI's can be replaced with the use of LOTO. After a circuit verification was performed on both GFCI receptacles per WO# 323753 to identify the circuit feeding both receptacles an eight-criteria checklist was written to replace both failed GFCI receptacles. Utilizing WO# 377160 and procedure 3-EDS-180 with the eight-criteria checklist the electricians attempted to replace the GFCI's.</p> <p>When the GFCI's were removed it was discovered that no grounding electrode wire was present. The electricians felt they could not install the new GFCI's without that wire and could not re-install the old GFCI's because of the degraded state they were found so they installed wire nuts on each wire end and put blank covers on both GFCI boxes to ensure a safe configuration. After a conversation with engineering and a review of the National Electrical Code on 01/17/18 it was identified that it is acceptable to have a GFCI installed WITHOUT an equipment grounding conductor wire.</p> <p>Upon further review of the package it was also identified that one of the receptacles being inspected and replaced per WO# 377160 was not listed on the inspection data sheet but was hand written on the sheet without the proper signature from engineering. Operations has reported that they desire for the GFCI's remain in the current state.</p>
1/18/2018	WRPS-PER-2018-0118	AW06A pump pit layout drawing error	<p>During review of the AW06A pump pit layout, a drawing error was discovered on Sheet 3 of the P&amp;ID for 241-AW-106 (H-14-020802). The drawing does not match the routing board (H-14-107346 SHT 3) or the Jumper Arrangement Drawing (H-2-70429 SHT 3). The P&amp;ID is missing the jumper between nozzle A, nozzle G and the pump, AW06A-WT-J-[A-G-PUMP].</p> <p>Revision 12 of H-14-020802 SHT 3 shows the old configuration of 241-AW-106 prior to the replacement of the AW06A jumpers and pump. ECN-711420 Rev. 01 installs the new AW-06A Pump and Jumper which provides the correct change to the tank configuration. Revision 13 of H-14-020802 SHT 3 incorporates ECN-711420 Rev. 01, however does not include the jumper AW06A-WT-J-[A-G-PUMP] change as shown on page 8 of 9 of ECN-711420 Rev. 01.</p> <p>This drawing should match the routing board configuration.</p>

1/18/2018	WRPS- PER- 2018- 0095	EP-PE 6 - Emergency Response Organization	<p>EP-PE 6 - Emergency Response Organization (ERO)</p> <p>On December 13th, 2017 Emergency Preparedness conducted an ICP Limited Drill that included Tank Farm ERO personnel and a waste spill from a suspended object in AX farm (EM-PO-ICP-2017-12-02). During the course of the drill the evaluation team identified the following issue:</p> <p>Proper chain of command was not followed in two specific instances in the drill. The first instance the BED Assistant issued safe route of travel instruction to responding ERO members without verifying the instruction with the BED. The second instance the FOS instructed the movement of people from the event scene to an occupied facility without conferring with the OSC first.</p> <p>P/E 6.18- ERO Operations</p>
1/18/2018	WRPS- PER- 2018- 0117	ERO binders and materials within them are not current	<p>During a pre-drill walk down of the ICP in 274-AW it was discovered that the ERO binders and materials within them, which include RLEPs, ERPs, AOPs, and various other procedures that are used during emergency response, were not up to date and were not being checked on a monthly basis.</p> <p>Program Element 9 - Facilities and Equipment (P.8.14) Facilities (Program)</p>
1/18/2018	WRPS- PER- 2018- 0119	Completed NCR records were found to contain various errors and omissions	<p>TITLE OF PER: Contrary to procedures TFC-BSM-IRM_DC-C-02 and TFC-ESHQ-Q_ADM-C-02 completed nonconformance report records were found to contain various errors and omissions</p> <p>Title of Independent Surveillance: Quality Assurance Program Requirement 15, "Control of Nonconforming Items"</p> <p>Purpose and/or Scope: The U.S. Department of Energy, Office of River Protection (ORP) Quality Assurance Division conducted a quality assurance (QA) independent surveillance (QAIS) of Washington River Protection Solution LLC's (WRPS) implementation of ASME NQA-1-2008, Quality Assurance Requirements for Nuclear Facility Applications, and ASME NQA-1a-2009, Addenda to ASME NQA-1-2008: Quality Assurance Requirements for Nuclear Facility Applications.</p> <p>Requirement 15, "Control of Nonconforming Items."</p> <hr/> <p>18061-TF-F01 - Contrary to procedures TFC-BSM-IRM_DC-C-02, Records Management, and TFC-ESHQ-Q_ADM-C-02, Nonconforming Item Reporting and Control, completed nonconformance report records were found to contain various errors and omissions, resulting in incomplete or inaccurate quality assurance records (Priority Level 3, Beach).</p> <p>Requirements Not Met:</p> <p>10 CFR 830, "Nuclear Safety Management," Subpart A, "Quality Assurance Requirements," 830.122, "Quality assurance criteria," (e) "Criterion 5— Performance/Work Processes," stated in part: Perform work consistent with technical standards, administrative controls, and other hazard controls adopted to meet regulatory or contract requirements, using approved instructions, procedures, or other appropriate means.</p> <p>ASME NQA-1a-2009, Part I, Requirement 5, "Instructions, Procedures and Drawings," Section 100, "Basic," stated in part: Activities affecting quality and services shall be prescribed by and performed in accordance with documented instructions, procedures, or drawings...</p> <p>Requirement 17, "Quality Assurance Records," Section 200, "Generation of Records," stated in part: Records shall be traceable to associated items and activities and accurately reflect the work accomplished or information required.</p> <p>TFC-PLN-02, Rev. H-3, Part I, Chapter 5.0, "Instructions, Procedures, and Drawings," Section 5.1, "General," item 1, stated: Activities affecting quality and services shall be prescribed by and performed in accordance with documented instructions, procedures, and drawings that include or reference appropriate quantitative or qualitative acceptance criteria for determining that prescribed activities have been satisfactorily accomplished.</p>

1/18/2018	WRPS-PER-2018-0120	Package that was leaking at Receiving was delivered to 222-5 and found to be non rad/hazardous	A package was delivered to 222-5 Laboratory that was received through Central Receiving. (b)(6) who delivered reported the package was identified as leaking prior to it being delivered to 222-5. Once the package was placed in Room 5 A/B in a contained lab cart the FOM responded and began following proper procedures to mitigate a Spill, since the content of the package was unknown. This should not have happened because the package should not have been delivered.
1/18/2018	WRPS-PER-2018-0121	Contrary to TFC-ESHQ-Q_ADM-C-02 the subject nonconforming item controls	<p>TITLE of PER: Contrary to TFC-ESHQ-Q_ADM-C-02 the subject nonconforming item controls were either not applied or their applicability not readily recognized</p> <p>Title of Independent Surveillance: Quality Assurance Program Requirement 15, "Control of Nonconforming Items"</p> <p>Purpose and/or Scope: The U.S. Department of Energy, Office of River Protection (ORP) Quality Assurance Division conducted a quality assurance (QA) independent surveillance (QAIS) of Washington River Protection Solution LLC's (WRPS) implementation of ASME NQA-1-2008, Quality Assurance Requirements for Nuclear Facility Applications, and ASME NQA-1a-2009, Addenda to ASME NQA-1-2008: Quality Assurance Requirements for Nuclear Facility Applications, Requirement 15, "Control of Nonconforming Items."</p> <p>18061-TF-F02 – Contrary to the provisions of TFC-ESHQ-Q_ADM-C-02, Nonconforming Item Reporting and Control, the subject nonconforming item controls were either not applied or their applicability not readily recognized (Priority Level 3, Dunhour).</p> <p>Requirements Not Met:</p> <p>10 CFR 830, Subpart A, 830.122 (c) "Criterion 3—Management/Quality Improvement," stated in part:</p> <p>(2) identify, control, and correct items, services, and processes that do not meet established requirements.</p> <p>10 CFR 830.122 (e) Criterion 5, stated in part:</p> <p>(1) Perform work consistent with technical standards, administrative controls, and other hazard controls adopted to meet regulatory or contract requirements, using approved instructions, procedures, or other appropriate means.</p> <p>ASME NQA-1a-2009, Part I, Requirement 5, Section 100, stated in part:</p> <p>Activities affecting quality and services shall be prescribed by and performed in accordance with documented instructions, procedures, or drawings.</p> <p>Requirement 15, Section 100, stated in part:</p> <p>Items that do not conform to specified requirements shall be controlled to prevent inadvertent installation or use. Controls shall provide for identification, documentation, evaluation, segregation when practical, and disposition of nonconforming items, and for notification to affected organizations.</p>
1/18/2018	WRPS-PER-2018-0122	Evaluate training for engineering and quality assurance	<p>TITLE of PER: Evaluate training for engineering and quality assurance to effectively implement TFC-ESHQ-Q_ADM-C-02</p> <p>Title of Independent Surveillance: Quality Assurance Program Requirement 15, "Control of Nonconforming Items"</p> <p>Purpose and/or Scope: The U.S. Department of Energy, Office of River Protection (ORP) Quality Assurance Division conducted a quality assurance (QA) independent surveillance (QAIS) of Washington River Protection Solution LLC's (WRPS) implementation of ASME NQA-1-2008, Quality Assurance Requirements for Nuclear Facility Applications, and ASME NQA-1a-2009, Addenda to ASME NQA-1-2008: Quality Assurance Requirements for Nuclear Facility Applications, Requirement 15, "Control of Nonconforming Items."</p> <p>18061-TF-001 – WRPS should evaluate training and guidance provided for engineering and quality assurance personnel, in support of their responsibilities to effectively implement TFC-ESHQ-Q_ADM-C-02, Nonconforming Item Reporting and Control, procedure steps, including the development and approval of effective dispositions for nonconforming items, and performance roles and responsibilities. Supplemental guidance or instruction, such as required reading, may be appropriate (Dunhour).</p> <p>Discussion:</p> <p>A review of NCR records revealed the following conditions, representing inconsistent or questionable practices regarding NCR dispositions:</p> <p>TF-15-NCR-029, TF-16-NCR-028, TF-16-NCR-029, TF-16-NCR-046, and TF-17-NCR-002, block 19, final disposition selection, the box for "Repair" was checked; however, the disposition was more accurately classified as "rework," since the original requirements were satisfied.</p> <p>TF-16-NCR-004, block 19, the final disposition was marked "Use-As-Is"; however, the reported nonconforming components (two nipples and upper union) were to be replaced by the vendor, which should have resulted in (or at least included) a selection of "Reject." The disposition has discussed commercial grade dedication processing and cannibalization of accepted items, but failed to disposition the actual nonconforming components. It was noted that two prior disposition efforts were voided (one interim and one final). Additionally, block 19B was marked "N/A" and therefore provided no disposition instructions regarding the disposal of the rejected items. Consequently, the NCR record failed to effectively document completion of a disposition relative to the specific components reported as nonconforming.</p> <p>TF-16-NCR-007, block 19, the final disposition had been identified as "rework," although the subject nonconforming components were ultimately rejected and discarded." Block 19B, the final disposition instructions failed to include the disposition of the rejected components.</p>

1/18/2018	WRPS-PER-2018-0123	Evaluate conditions and suggestions regarding procedure TFC-ESHQ-Q_ADM-C-02	<p>TITLE of PER: evaluate conditions and suggestions regarding procedure TFC-ESHQ-Q_ADM-C-02 and make revisions as appropriate</p> <p>Title of Independent Surveillance: Quality Assurance Program Requirement 15, "Control of Nonconforming Items"</p> <p>Purpose and/or Scope: The U.S. Department of Energy, Office of River Protection (ORP) Quality Assurance Division conducted a quality assurance (QA) independent surveillance (QAIS) of Washington River Protection Solution LLC's (WRPS) implementation of ASME NQA-1-2008, Quality Assurance Requirements for Nuclear Facility Applications, and ASME NQA-1a-2009, Addenda to ASME NQA-1-2008: Quality Assurance Requirements for Nuclear Facility Applications, Requirement 15, "Control of Nonconforming Items."</p> <p>-----</p> <p>18061-TF-002 – WRPS should evaluate conditions and suggestions regarding procedure TFC-ESHQ-Q_ADM-C-02, Nonconforming Item Reporting and Control, and make revisions as appropriate (Beach).</p> <p>Discussion:  The following conditions and suggestions should be evaluated:  Step 4.1.7 should be evaluated to determine if some conditional variation should be provided, if the shift office notification was not always required (e.g., for items not yet received).  Note: TF-15-NCR-029, TF-16-NCR-028, TF-16-NCR-046, and TF-17-NCR-002, block 10 indicated no shift office notification was made or needed; however, step 4.1.7 did not provide that option.  Step 4.2.1 should be revised to identify the actionee.  Step 4.3.15 should be revised using the "in-process" tag to return items to the vendor.  Step 4.3.16 should address the removal of remaining hold tags for items scrapped, discarded, destroyed, etc. (i.e., rejected items not returned to the vendor).  Step 4.3.15 through 4.3.18 should be revised to identify "QA" as the actionee.  Step 4.4.4, stated: "At this point the closed NCR is authenticated and considered a record and ready for upload to IDMS." This step should be examined in light of subsequent step 4.4.8 ("Paginate the NCR"). Pagination is necessary to complete the quality record and should be completed and verified concurrent with authentication.  Figure 1, "Flowchart," consider including the update/removal of status tags within the flow chart (e.g., update status tag[s] [as appropriate] and "work disposition," "verify disposition complete," and update status tag[s], remove remaining hold tag[s] and "Close NCR").</p>
1/18/2018	WRPS-PER-2018-0125	Labeling system for Tank Farm Lock Boxes	<p>Personnel have observed that there is no permanent identification labels or labeling system established for Tank Farm Lock Boxes. In some circumstances, labels for lock boxes are created for each job and then applied by writing on various types of tape, such as masking tape. The concern is that tape labels can be worn off or not stick to the lock boxes during inclement weather conditions or extremes in temperature.</p>
1/18/2018	WRPS-PER-2018-0126	TFC-ESHQ-S-STD-05 Conflicts With NFPA 101	<p>Recently implemented DOE-ORP implementing document MGT-ENG-IP-05, Rev. 3, Fire Protection Program, identifies International Building Code (IBC) for most structural design functions in design of a new structure or modification to an existing structure. MGT-ENG-IP-05, Rev. 3, also specifies building construction related to egress shall comply with NFPA 101, Life Safety Code. It goes on to say, "Compliance with NFPA 101 shall be considered to satisfy the exit requirements of 29 CFR 1910, "Occupational Safety and Health Standards."</p> <p>TFC-ESHQ-S-STD-05, Walking and Working Surfaces, conflicts with NFPA 101 in several areas. In nearly every occasion the conflicts result in less restrictive guidance in TFC-ESHQ-S-STD-05. This results in installations in WRPS buildings and in Tank Farms, designed to meet "OSHA" that fail to meet NFPA 101.</p>

1/19/2018	WRPS-PER-2018-0127	cathodic protection check it was discovered that several readings did not meet the NACE 100 mV criteria	During the 2017 cathodic protection check it was discovered that several readings did not meet the NACE 100 mV criteria and two readings taken are greater than 1200 mV which may indicate overprotection.
1/19/2018	WRPS-PER-2018-0128	Catch Basin LERF 43 piping system leak	LERF-43 submersible pump may have been in the ON position and dead-headed against SHUT valves over an unknown period of time; causing a potentially unsafe condition / configuration, and eventual manifested in a leak on the temporary manifold piping system within the Catch Basin RBA.
1/21/2018	WRPS-PER-2018-0129	242A Stop Work for AOP-EVAP-004 Clarifications	Stop work regarding 242A Evaporator Condenser Room entry for non-AOP actions while in AOP-EVAP-004 until written guidance has been provided for entry requirements.

1/21/2018	WRPS-PER-2018-0025	TFC-OPS-OPER-C-28 incorrectly cites TFC-PLN-41	<p>Observation-01: (WRPS-PER-2018-0025): TFC-OPS-OPER-C-28 incorrectly cites TFC-PLN-41, Integrated Safety Management System Description, as a requirements document instead of a reference.</p> <p>"A required assessment, FY2018-OPI-R-0199 Operating Experience / Lessons Learned Program Implementation Effectiveness Assessment Report, on WRPS' Operating Experience / Lessons Learned program implementation effectiveness was conducted during December of 2017. No findings resulted from the performance of this assessment, however, seven opportunities for improvement were documented as 'observations' in WRPS' issues management system, Problem Evaluation Request (PER) system. Refer to attachment 'FY2018-OPI-R-0199.pdf', Section 5.0, Assessment Results. This assessment validated the WRPS Operating Experience / Lessons Learned program is in compliance with both requirement and intent.</p> <p>The WRPS Prime Contract (Contract DE-AC27-08RV14800) delineates both the requirements for the Operating Experience / Lessons Learned program (Section C.3.2.5), and DOE O 210.2A, DOE Corporate Operating Experience Program as the source requirement (Section J.2) for implementation by TFC-OPS-OPER-C-28, Operating Experience / Lessons Learned.</p> <p>The use of the OPEXSHARE web application (owned by DOE RL / ORP and administered by MSA) as the tool for implementing Operating Experience / Lessons Learned Program by Hanford Contractors is directed by DOE-ORP: 10-ESQ-429 Use of Hanford Information Lessons Learned Sharing (HILLS)/OPEXSHARE.</p> <p>To the extent this assessment looked at compliance, a comparison of TFC-OPS-OPER-C-28 and DOE O 210.2A validates requirements flow down, and indicates WRPS' Operating Experience / Lesson Learned Program is implemented and directly aligned with the requirements and concepts of the DOE Corporate Operating Experience Program. The Washington River Protection Solutions' Operating Experience/Lessons Learned (OPEX / LL) Program, implemented by TFC-OPS-OPER-C-28, adequately identifies organizational roles, responsibilities, and processes related to application and generation of OPEX / LL content for the purpose of minimizing adverse events, negative trends, and reliability related events, and also for the purpose of improving performance or cost savings.</p> <p>To the extent this assessment looked at effectiveness, as opposed to only compliance, the results of this assessment indicate the majority of the WRPS personnel with defined, specific roles / responsibilities as identified in TFC-OPS-OPER-C-28, understand their roles / responsibilities; employees are familiar with the OPEX / LL Program purpose and fundamental concepts. However, additional instruction is needed for some to understand the criteria (how, when, or why) for generating new OPEX / LL content, how to apply relevant incoming OPEX / LL content, and how to use the OPEXSHARE web application as the tool for implementing WRPS' Operating Experience / Lessons Learned Program (results indicate OPEX / LL is being shared and applied, however, not recorded in the OPEXSHARE 'Feedback Mechanism', thus no credit is being taken and reported as 'Content Application' on the WRPS monthly metrics).</p> <p>In summary, FY2018-OPI-R-0199 Operating Experience / Lessons Learned Program Implementation Effectiveness Assessment Report verified the WRPS Operating Experience / Lessons Learned program is fully implemented and effective."</p>
1/21/2018	WRPS-PER-2018-0026	Improve knowledge base of procedure owners to foster their understanding of the OPEX / LL Program in order to improving consistency	<p>Observation-02: (WRPS-PER-2018-0026) WRPS procedures that include language about 'lessons learned' or 'OPEXSHARE' should be reviewed for consistency / clarification in relating to the OPEX / LL programmatic requirements (WRPS' OPEX / LL Program which implements DOE O 210.2A). Best practices (ATS-MP-1002) in referencing Operating Experience / Lessons Learned (accordance with TFC-OPS-OPER-C-28) should be further reviewed, and shared with document owners.</p> <p>Of the 130 plus WRPS procedures that reference 'lessons learned' only 40 include TFC-OPS-OPER-C-28 in their reference section. This variance indicates a lack of understanding of the Operating Experience / Lessons Learned program and/or a misuse in terminology, and the potential for improvement in consistency and clarity in procedure language.</p> <p>"A required assessment, FY2018-OPI-R-0199 Operating Experience / Lessons Learned Program Implementation Effectiveness Assessment Report, on WRPS' Operating Experience / Lessons Learned program implementation effectiveness was conducted during December of 2017. No findings resulted from the performance of this assessment, however, seven opportunities for improvement were documented as 'observations' in WRPS' issues management system, Problem Evaluation Request (PER) system. Refer to attachment 'FY2018-OPI-R-0199.pdf', Section 5.0, Assessment Results. This assessment validated the WRPS Operating Experience / Lessons Learned program is in compliance with both requirement and intent.</p> <p>The WRPS Prime Contract (Contract DE-AC27-08RV14800) delineates both the requirements for the Operating Experience / Lessons Learned program (Section C.3.2.5), and DOE O 210.2A, DOE Corporate Operating Experience Program as the source requirement (Section J.2) for implementation by TFC-OPS-OPER-C-28, Operating Experience / Lessons Learned.</p> <p>The use of the OPEXSHARE web application (owned by DOE RL / ORP and administered by MSA) as the tool for implementing Operating Experience / Lessons Learned Program by Hanford Contractors is directed by DOE-ORP: 10-ESQ-429 Use of Hanford Information Lessons Learned Sharing (HILLS)/OPEXSHARE.</p> <p>To the extent this assessment looked at compliance, a comparison of TFC-OPS-OPER-C-28 and DOE O 210.2A validates requirements flow down, and indicates WRPS' Operating Experience / Lesson Learned Program is implemented and directly aligned with the requirements and concepts of the DOE Corporate Operating Experience Program. The Washington River Protection Solutions' Operating Experience/Lessons Learned (OPEX / LL) Program, implemented by TFC-OPS-OPER-C-28, adequately identifies organizational roles, responsibilities, and processes related to application and generation of OPEX / LL content for the purpose of minimizing adverse events, negative trends, and reliability related events, and also for the purpose of improving performance or cost savings.</p> <p>To the extent this assessment looked at effectiveness, as opposed to only compliance, the results of this assessment indicate the majority of the WRPS personnel with defined, specific roles / responsibilities as identified in TFC-OPS-OPER-C-28, understand their roles / responsibilities; employees are familiar with the OPEX / LL Program purpose and fundamental concepts. However, additional instruction is needed for some to understand the criteria (how, when, or why) for generating new OPEX / LL content, how to apply relevant incoming OPEX / LL content, and how to use the OPEXSHARE web application as the tool for implementing WRPS' Operating Experience / Lessons Learned Program (results indicate OPEX / LL is being shared and applied, however, not recorded in the OPEXSHARE 'Feedback Mechanism', thus no credit is being taken and reported as 'Content Application' on the WRPS monthly metrics).</p> <p>In summary, FY2018-OPI-R-0199 Operating Experience / Lessons Learned Program Implementation Effectiveness Assessment Report verified the WRPS Operating Experience / Lessons Learned program is fully implemented and effective."</p>
1/21/2018	WRPS-PER-2018-0028	Implement periodic communication to workers in order to raise awareness on the WRPS OPEX / LL Program requirements and uses.	<p>Observation-03: (WRPS-PER-2018-0028) information about Operating Experience / Lessons Learned content, concepts, terminology, etc. (e.g., who can generate content, when worker feedback is appropriate, running reports) should be communicated to the workforce on a periodic basis, with additional emphasis on retrieval and generation of content for those employees with specialized scope (see also FY2018-OPI-R-0199 Observation-04, WRPS-PER-2018-0029).</p> <p>There is a lack of awareness that everyone (anyone) can comment on OPEXSHARE content or generate WRPS OPEX / LL content (for publication to OPEXSHARE).</p> <p>While the OPEXSHARE application is not owned or maintained by WRPS, WRPS' use (&amp; all Hanford contractors) is mandated by DOE-ORP: 10-ESQ-429 which directs the use the web application developed by DOE Richland Operations Office and Office of River Protection.</p> <p>"A required assessment, FY2018-OPI-R-0199 Operating Experience / Lessons Learned Program Implementation Effectiveness Assessment Report, on WRPS' Operating Experience / Lessons Learned program implementation effectiveness was conducted during December of 2017. No findings resulted from the performance of this assessment, however, seven opportunities for improvement were documented as 'observations' in WRPS' issues management system, Problem Evaluation Request (PER) system. Refer to attachment 'FY2018-OPI-R-0199.pdf', Section 5.0, Assessment Results. This assessment validated the WRPS Operating Experience / Lessons Learned program is in compliance with both requirement and intent.</p> <p>The WRPS Prime Contract (Contract DE-AC27-08RV14800) delineates both the requirements for the Operating Experience / Lessons Learned program (Section C.3.2.5), and DOE O 210.2A, DOE Corporate Operating Experience Program as the source requirement (Section J.2) for implementation by TFC-OPS-OPER-C-28, Operating Experience / Lessons Learned.</p> <p>The use of the OPEXSHARE web application (owned by DOE RL / ORP and administered by MSA) as the tool for implementing Operating Experience / Lessons Learned Program by Hanford Contractors is directed by DOE-ORP: 10-ESQ-429 Use of Hanford Information Lessons Learned Sharing (HILLS)/OPEXSHARE.</p> <p>To the extent this assessment looked at compliance, a comparison of TFC-OPS-OPER-C-28 and DOE O 210.2A validates requirements flow down, and indicates WRPS' Operating Experience / Lesson Learned Program is implemented and directly aligned with the requirements and concepts of the DOE Corporate Operating Experience Program. The Washington River Protection Solutions' Operating Experience/Lessons Learned (OPEX / LL) Program, implemented by TFC-OPS-OPER-C-28, adequately identifies organizational roles, responsibilities, and processes related to application and generation of OPEX / LL content for the purpose of minimizing adverse events, negative trends, and reliability related events, and also for the purpose of improving performance or cost savings.</p> <p>To the extent this assessment looked at effectiveness, as opposed to only compliance, the results of this assessment indicate the majority of the WRPS personnel with defined, specific roles / responsibilities as identified in TFC-OPS-OPER-C-28, understand their roles / responsibilities; employees are familiar with the OPEX / LL Program purpose and fundamental concepts. However, additional instruction is needed for some to understand the criteria (how, when, or why) for generating new OPEX / LL content, how to apply relevant incoming OPEX / LL content, and how to use the OPEXSHARE web application as the tool for implementing WRPS' Operating Experience / Lessons Learned Program (results indicate OPEX / LL is being shared and applied, however, not recorded in the OPEXSHARE 'Feedback Mechanism', thus no credit is being taken and reported as 'Content Application' on the WRPS monthly metrics).</p> <p>In summary, FY2018-OPI-R-0199 Operating Experience / Lessons Learned Program Implementation Effectiveness Assessment Report verified the WRPS Operating Experience / Lessons Learned program is fully implemented and effective."</p>

1/21/2018	WRPS-PER-2018-0029	Implement specific types of training	<p>Observation-04: (WRPS-PER-2018-0029) Training should be evaluated for inclusion of the Operating Experience / Lessons Learned Programmatic fundamentals and the use of the OPEXSHARE web application [new Manager/Supervisor training; additional training for existing Managers / Program Managers / Supervisors / Subject Matter Experts / Planners; general employee training; evaluate creating OPEX / LL training course for those personnel assigned required roles / responsibilities and evaluate revising the Tank Operations Contract Hanford General Employee Training (HGET) content].</p> <p>"A required assessment, FY2018-OPI-R-0199 Operating Experience / Lessons Learned Program Implementation Effectiveness Assessment Report, on WRPS' Operating Experience / Lessons Learned program implementation effectiveness was conducted during December of 2017. No findings resulted from the performance of this assessment, however, seven opportunities for improvement were documented as 'observations' in WRPS' issues management system, Problem Evaluation Request (PER) system. Refer to attachment 'FY2018-OPI-R-0199.pdf', Section 5.0, Assessment Results. This assessment validated the WRPS Operating Experience / Lessons Learned program is in compliance with both requirement and intent.</p> <p>The WRPS Prime Contract (Contract DE-AC27-08RV14800) delineates both the requirements for the Operating Experience / Lessons Learned program (Section C.3.2.5), and DOE O 210.2A, DOE Corporate Operating Experience Program as the source requirement (Section J.2) for implementation by TFC-OPS-OPER-C-28, Operating Experience / Lessons Learned.</p> <p>The use of the OPEXSHARE web application (owned by DOE RL / ORP and administered by MSA) as the tool for implementing Operating Experience / Lessons Learned Program by Hanford Contractors is directed by DOE-ORP: 10-ESQ-429 Use of Hanford Information Lessons Learned Sharing (HILLS)/OPEXSHARE.</p> <p>To the extent this assessment looked at compliance, a comparison of TFC-OPS-OPER-C-28 and DOE O 210.2A validates requirements flow down, and indicates WRPS' Operating Experience / Lesson Learned Program is implemented and directly aligned with the requirements and concepts of the DOE Corporate Operating Experience Program. The Washington River Protection Solutions' Operating Experience/Lessons Learned (OPEX / LL) Program, implemented by TFC-OPS-OPER-C-28, adequately identifies organizational roles, responsibilities, and processes related to application and generation of OPEX / LL content for the purpose of minimizing adverse events, negative trends, and reliability related events, and also for the purpose of improving performance or cost savings.</p> <p>To the extent this assessment looked at effectiveness, as opposed to only compliance, the results of this assessment indicate the majority of the WRPS personnel with defined, specific roles / responsibilities as identified in TFC-OPS-OPER-C-28, understand their roles / responsibilities; employees are familiar with the OPEX / LL Program purpose and fundamental concepts. However, additional instruction is needed for some to understand the criteria (how, when, or why) for generating new OPEX / LL content, how to apply relevant incoming OPEX / LL content, and how to use the OPEXSHARE web application as the tool for implementing WRPS' Operating Experience / Lessons Learned Program (results indicate OPEX / LL is being shared and applied, however, not recorded in the OPEXSHARE 'Feedback Mechanism', thus no credit is being taken and reported as 'Content Application' on the WRPS monthly metrics).</p> <p>In summary, FY2018-OPI-R-0199 Operating Experience / Lessons Learned Program Implementation Effectiveness Assessment Report verified the WRPS Operating Experience / Lessons Learned program is fully implemented and effective."</p>
1/21/2018	WRPS-PER-2018-0030	TFC-ESHQ-AP-C-03 and MOP (ATS database)	<p>Observation-05: (WRPS-PER-2018-0030) Provide the 'Lessons Learned' and 'Lessons Learned Summary' field annotation direction within the MOP (ATS Database) and /or MOP procedure, TFC-ESHQ-AP-C-03; clarify and improve the interface to Operating Experience / Lessons Learned procedure, TFC-OPS-OPER-C-28 (Refer to FY2018-OPI-R-0199 LOI-10a Response).</p> <p>Field additions to MOP implemented years back by the MOP administrator and the OPEX / LL Program Coordinator to take advantage of another venue for identifying lessons learned from field activity observations...could be useful function, however, is not clearly annotated nor described in the Management Observation Program, TFC-ESHQ-AP-C-03 nor the MOP (ATS database) Users Guide for Assessment Tracking System (ATS) so personnel are not using consistently; sometimes the 'Lessons Learned Summary' field is used to annotate reference to formal OPEX / LL content shared or applied, sometimes used for sharing informal safety share or suggestion, and sometimes communicates new information worthy of generating new OPEX / LL content. This field was originally set up to document any lessons learned or best practices identified during performance of a MOP worthy of generating new OPEX / LL content for sharing with workers and/or other DOE sites.</p> <p>"A required assessment, FY2018-OPI-R-0199 Operating Experience / Lessons Learned Program Implementation Effectiveness Assessment Report, on WRPS' Operating Experience / Lessons Learned program implementation effectiveness was conducted during December of 2017. No findings resulted from the performance of this assessment, however, seven opportunities for improvement were documented as 'observations' in WRPS' issues management system, Problem Evaluation Request (PER) system. Refer to attachment 'FY2018-OPI-R-0199.pdf', Section 5.0, Assessment Results. This assessment validated the WRPS Operating Experience / Lessons Learned program is in compliance with both requirement and intent.</p> <p>The WRPS Prime Contract (Contract DE-AC27-08RV14800) delineates both the requirements for the Operating Experience / Lessons Learned program (Section C.3.2.5), and DOE O 210.2A, DOE Corporate Operating Experience Program as the source requirement (Section J.2) for implementation by TFC-OPS-OPER-C-28, Operating Experience / Lessons Learned.</p> <p>The use of the OPEXSHARE web application (owned by DOE RL / ORP and administered by MSA) as the tool for implementing Operating Experience / Lessons Learned Program by Hanford Contractors is directed by DOE-ORP: 10-ESQ-429 Use of Hanford Information Lessons Learned Sharing (HILLS)/OPEXSHARE.</p> <p>To the extent this assessment looked at compliance, a comparison of TFC-OPS-OPER-C-28 and DOE O 210.2A validates requirements flow down, and indicates WRPS' Operating Experience / Lesson Learned Program is implemented and directly aligned with the requirements and concepts of the DOE Corporate Operating Experience Program. The Washington River Protection Solutions' Operating Experience/Lessons Learned (OPEX / LL) Program, implemented by TFC-OPS-OPER-C-28, adequately identifies organizational roles, responsibilities, and processes related to application and generation of OPEX / LL content for the purpose of minimizing adverse events, negative trends, and reliability related events, and also for the purpose of improving performance or cost savings.</p> <p>To the extent this assessment looked at effectiveness, as opposed to only compliance, the results of this assessment indicate the majority of the WRPS personnel with defined, specific roles / responsibilities as identified in TFC-OPS-OPER-C-28, understand their roles / responsibilities; employees are familiar with the OPEX / LL Program purpose and fundamental concepts. However, additional instruction is needed for some to understand the criteria (how, when, or why) for generating new OPEX / LL content, how to apply relevant incoming OPEX / LL content, and how to use the OPEXSHARE web application as the tool for implementing WRPS' Operating Experience / Lessons Learned Program (results indicate OPEX / LL is being shared and applied, however, not recorded in the OPEXSHARE 'Feedback Mechanism', thus no credit is being taken and reported as 'Content Application' on the WRPS monthly metrics).</p> <p>In summary, FY2018-OPI-R-0199 Operating Experience / Lessons Learned Program Implementation Effectiveness Assessment Report verified the WRPS Operating Experience / Lessons Learned program is fully implemented and effective."</p>
1/21/2018	WRPS-PER-2018-0031	OPEXSHARE	<p>Observation-06: (WRPS-PER-2018-0031) Provide additional information (communication) on reasoning for passwords, log-in requirements (every 30 days must access the OPEXSHARE web application), etc.; OPEX / LL Program Coordinator explore organizational options for assistance in recording feedback.</p> <p>As in previous WRPS OPEX / LL assessments, comments were received during performance of this assessment related to OPEXSHARE's password requirements, log-in difficulties, or password resetting inconveniences. Previous assessment, FY2015-OPI-S-0319, Lessons Learned Program Effectiveness Report, identified this issue and documented as PER action, WRPS-PER-2015-1904.1, which dispositioned this concern as follows: 'Applications that run on doe.gov domain are required to meet specific cyber security requirements. Because of that OPEXSHARE is required to be a password protected... Should be noted in the past, the access refresh (log-in requirement) was originally set at 2 weeks [HILLS, then OPEXSHARE], was extended to 30 days to accommodate WRPS.' This is not controlled by WRPS as OPEXSHARE is DOE owned, MSA managed.</p> <p>While the OPEXSHARE application is not owned or maintained by WRPS, use is mandated by DOE-ORP: 10-ESQ-429. OPEXSHARE is the web application required to be used by Hanford contractors for implementing the DOE Corporate Operating Experience program.</p> <p>"A required assessment, FY2018-OPI-R-0199 Operating Experience / Lessons Learned Program Implementation Effectiveness Assessment Report, on WRPS' Operating Experience / Lessons Learned program implementation effectiveness was conducted during December of 2017. No findings resulted from the performance of this assessment, however, seven opportunities for improvement were documented as 'observations' in WRPS' issues management system, Problem Evaluation Request (PER) system. Refer to attachment 'FY2018-OPI-R-0199.pdf', Section 5.0, Assessment Results. This assessment validated the WRPS Operating Experience / Lessons Learned program is in compliance with both requirement and intent.</p> <p>The WRPS Prime Contract (Contract DE-AC27-08RV14800) delineates both the requirements for the Operating Experience / Lessons Learned program (Section C.3.2.5), and DOE O 210.2A, DOE Corporate Operating Experience Program as the source requirement (Section J.2) for implementation by TFC-OPS-OPER-C-28, Operating Experience / Lessons Learned.</p> <p>The use of the OPEXSHARE web application (owned by DOE RL / ORP and administered by MSA) as the tool for implementing Operating Experience / Lessons Learned Program by Hanford Contractors is directed by DOE-ORP: 10-ESQ-429 Use of Hanford Information Lessons Learned Sharing (HILLS)/OPEXSHARE.</p> <p>To the extent this assessment looked at compliance, a comparison of TFC-OPS-OPER-C-28 and DOE O 210.2A validates requirements flow down, and indicates WRPS' Operating Experience / Lesson Learned Program is implemented and directly aligned with the requirements and concepts of the DOE Corporate Operating Experience Program. The Washington River Protection Solutions' Operating Experience/Lessons Learned (OPEX / LL) Program, implemented by TFC-OPS-OPER-C-28, adequately identifies organizational roles, responsibilities, and processes related to application and generation of OPEX / LL content for the purpose of minimizing adverse events, negative trends, and reliability related events, and also for the purpose of improving performance or cost savings.</p> <p>To the extent this assessment looked at effectiveness, as opposed to only compliance, the results of this assessment indicate the majority of the WRPS personnel with defined, specific roles / responsibilities as identified in TFC-OPS-OPER-C-28, understand their roles / responsibilities; employees are familiar with the OPEX / LL Program purpose and fundamental concepts. However, additional instruction is needed for some to understand the criteria (how, when, or why) for generating new OPEX / LL content, how to apply relevant incoming OPEX / LL content, and how to use the OPEXSHARE web application as the tool for implementing WRPS' Operating Experience / Lessons Learned Program (results indicate OPEX / LL is being shared and applied, however, not recorded in the OPEXSHARE 'Feedback Mechanism', thus no credit is being taken and reported as 'Content Application' on the WRPS monthly metrics).</p> <p>In summary, FY2018-OPI-R-0199 Operating Experience / Lessons Learned Program Implementation Effectiveness Assessment Report verified the WRPS Operating Experience / Lessons Learned program is fully implemented and effective."</p>

1/21/2018	WRPS-PER-2018-0032	Determine if OPEXSHARE web application improvements (reporting, search function fields, web application training) can be made	<p>Observation-07: (WRPS-PER-2018-0032) Determine if OPEXSHARE web application improvements (reporting, search function fields, web application training) can be made; interface with the OPEXSHARE system administrator and the Hanford Operating Experience Committee to socialize issues and results; communicate results to WRPS employees (Refer to FY2018-OPI-R-0199, Attachment 3 and 4, respectively).</p> <p>"A required assessment, FY2018-OPI-R-0199 Operating Experience / Lessons Learned Program implementation Effectiveness Assessment Report, on WRPS' Operating Experience / Lessons Learned program implementation effectiveness was conducted during December of 2017. No findings resulted from the performance of this assessment, however, seven opportunities for improvement were documented as 'observations' in WRPS' issues management system, Problem Evaluation Request (PER) system. Refer to attachment 'FY2018-OPI-R-0199.pdf', Section 5.0, Assessment Results. This assessment validated the WRPS Operating Experience / Lessons Learned program is in compliance with both requirement and intent.</p> <p>The WRPS Prime Contract (Contract DE-AC27-08RV14800) delineates both the requirements for the Operating Experience / Lessons Learned program (Section C.3.2.5), and DOE O 210.2A, DOE Corporate Operating Experience Program as the source requirement (Section 1.2) for implementation by TFC-OPS-OPER-C-28, Operating Experience / Lessons Learned.</p> <p>The use of the OPEXSHARE web application (owned by DOE RL / ORP and administered by MSA) as the tool for implementing Operating Experience / Lessons Learned Program by Hanford Contractors is directed by DOE-ORP: 10-ESQ-429 Use of Hanford Information Lessons Learned Sharing (HILLS)/OPEXSHARE.</p> <p>To the extent this assessment looked at compliance, a comparison of TFC-OPS-OPER-C-28 and DOE O 210.2A validates requirements flow down, and indicates WRPS' Operating Experience / Lesson Learned Program is implemented and directly aligned with the requirements and concepts of the DOE Corporate Operating Experience Program. The Washington River Protection Solutions' Operating Experience/Lessons Learned (OPEX / LL) Program, implemented by TFC-OPS-OPER-C-28, adequately identifies organizational roles, responsibilities, and processes related to application and generation of OPEX / LL content for the purpose of minimizing adverse events, negative trends, and reliability related events, and also for the purpose of improving performance or cost savings.</p> <p>To the extent this assessment looked at effectiveness, as opposed to only compliance, the results of this assessment indicate the majority of the WRPS personnel with defined, specific roles / responsibilities as identified in TFC-OPS-OPER-C-28, understand their roles / responsibilities; employees are familiar with the OPEX / LL Program purpose and fundamental concepts. However, additional instruction is needed for some to understand the criteria (how, when, or why) for generating new OPEX / LL content, how to apply relevant incoming OPEX / LL content, and how to use the OPEXSHARE web application as the tool for implementing WRPS' Operating Experience / Lessons Learned Program (results indicate OPEX / LL is being shared and applied, however, not recorded in the OPEXSHARE 'Feedback Mechanism', thus no credit is being taken and reported as 'Content Application' on the WRPS monthly metrics).</p> <p>In summary, FY2018-OPI-R-0199 Operating Experience / Lessons Learned Program Implementation Effectiveness Assessment Report verified the WRPS Operating Experience / Lessons Learned program is fully implemented and effective."</p>
1/22/2018	WRPS-PER-2018-0124	MO280 Trailer Remodel Planning Problem	<p>MO280 Trailer Remodel – Radiological controls incorporated into the work planning process after job commencement.</p> <p>During initial review of the "Scope of Work" document, the Tank Farm Project (TFP) Radiological Control Manager received communication that the work area was not within a posted Radiologically Controlled Area (RCA). The work scope involves an extensive remodel of an existing trailer, including but not limited to installation of new sidewalks, stairs, wind breaks, bathrooms, ceiling tiles, carpeting, doors, windows, etc...</p> <p>Both the Work Package Planner and the TFP Radcon Manager attended a job site walk down, neither of them noticing an RCA sign at the boundary fence. The work was allowed to go forward without the assignment of a Radcon Planner.</p> <p>It is plausible that the sign was removed by inclement weather, at this location a new sign has since been installed.</p>
1/22/2018	WRPS-PER-2018-0131	No Process in Place To Demonstrate GFCI Testing Complete	<p>While a process exists to address the work steps that ensure proper "operation" of GFCI (Ground Fault Circuit Interrupter) there is currently no process in place to demonstrate to an end user that the device has been tested within it's maintenance cycle. Data Sheet test results are only available for review if a worker knows which team to go to request to view them.</p>

1/22/2018	WRPS- PER- 2018- 0130	Newly installed Equipment Not Being Maintained To DOE Standards	Throughout the WRPS properties there are several installations of buildings, power/ mechanical Systems being fabricated and installed by subcontractors on several different contracts. The contracts being administered by WRPS and it's affiliates adequately address oversight during the construction and procurement of the above defined systems. Due to the complexity of several projects however, there are in several instances infrastructure not being turned over to maintenance operations to be placed in the preventative schedule cycle. Due to this gap in our system several items of equipment are not being maintained to the same standards that the Department of Energy requires in it's standards.
1/22/2018	WRPS- PER- 2018- 0132	2225 (b)(6) or (b)(6) (b)(6) using a ladder over 6 ft without a fall protection plan in wp. 363048	An employee safety concern was identified and brought to my attention pertaining to current project work 363048 HVAC Upgrade Rough In. Reviewing work package, the JHA identified scaffolding and or work platforms but nothing for ladder use or having a Fall Protection Work Permit (FPWP) especially over 6ft. Going to job location I observed (b)(6) worker at eight foot level on a ten foot ladder and asked if there was a fall protection plan in the package. (There was not) and I asked workers to come down and suspend work activities until one was developed.
1/22/2018	WRPS- PER- 2018- 0133	2225 Grant Construction using a NW Power Inc. ladder with not having required annual inspection completed.	An employee safety concern was identified and brought to my attention pertaining to current project work 363048 HVAC Upgrade Rough In. discovered the NW Power Inc. ladder being used does not have the required annual inspection sticker with required information as outlined in Ladders TFC-ESHQ-5-STD-01. Workers shall not use ladders that have exceeded the regular inspection due dates. The competent persons performing the periodic inspections will place a dated (expiration date) and signed purple sticker (see attachment A, Figure A-1) on the inspected ladder at the time of inspection. Subcontractors may use the WRPS sticker or their own as long as the information and color is the same.

1/22/2018	WRPS- PER- 2018- 0134	(b)(6) Perception by (b)(6) (b)(6) that a Fall Protection Work Permit is not required if they hold ladder while in use	An employee safety concern was identified and brought to my attention pertaining to current project work 363048 HVAC Upgrade Rough In. During evaluation and generation of per 2018-0133 & 2018-0132 I discovered (b)(6) (b)(6) ladder use allows then to hold a ladder and no Fall Protection Work Permit is needed (FFWP) even if over 6ft. They were (b)(6) where work was in process on a ten foot ladder and feet above the 6ft elevation. They were very (b)(6) I informed them of the requirement to evaluate work above 4ft for general & 6ft for construction industry or anytime work occurs above a hazardous condition.
1/22/2018	WRPS- PER- 2018- 0135	HVAC Vents in 2750E Restrooms Need Cleaning	HVAC vents in Mens/Womens restrooms in 2750 are full of dust/lint/dirt and is being reported as "spewing" debris which indicate a need for cleaning. Janitors were requested to clean the ducts, but they can only clean the outside, and stuff keeps coming out. Past requests have been sent in by 2750 residents (October 2016) to the WRPS Help Desk, but the issue is still being reported as not being resolved. This PER is being submitted due to the EACP safety book issue number NEAPC-10-03-17
1/22/2018	WRPS- PER- 2018- 0043	Configuratio n Managemen t Assessment	As a result of a Configuration Management assessment conducted in Dec. 2017, the following is an observation from that assessment. Project Turnover may not be ensuring that the status of components in the MEL is transitioned to "Operational" status at the time of turnover. SPF contains a status field for components, inherited from the old CHAMPS system that has values of Operational, Project, Out of Service, and Unknown. It is not clear that this field is being rigorously maintained, such that if equipment is installed by a project that the field is changed to Operational on turnover. Of the over 88,000 components in SPF, there were 10072 components still in the project status. While cursory review indicates many statuses are likely correct, it also indicates many are not. Verifying all component statuses as either Project, Operational, or Out of Service may be cost prohibitive to resolve. This brings into question the validity and importance of the status itself. This field is separate from the Safety Compliance status field for Safety Significant equipment and does not call into question the compliance status of safety equipment. This observation likely extends to transition of drawings from "Project" to "Facility" status and transfer of drawings and equipment from the "Project Design Authority" to the "System Design Authority" at the time of turnover.

1/22/2018	WRPS- PER- 2017- 2362	Incorrect EINs at ETF	<p>Finding No. 1 Some EINs under system 60F had a building number of 2025EA (ETF Administrative building) instead of the 2025E (ETF process building).</p>
1/22/2018	WRPS- PER- 2017- 2363	ETF Assessment Observation 1	<p>Observation No. 1 Some equipment was identified on the drawings that did not have EINs in SPF: 60F: FY-60F-273 on the drawing is identified as FCV-60F-273 in SPF. 95C: FO-95C-001</p>
1/22/2018	WRPS- PER- 2017- 2364	ETF Assessment Observation 2	<p>Observation No. 2 The list of essential drawings used by MSA as retrieved from DMCS was compared to the same list extracted from SPF (1,003 Documents). The two lists were found to be different. It appeared that the SPF list might be a subset of the DMCS list (1,385 Documents).</p>

1/22/2018	WRPS- PER- 2018- 0136	Tight Fitting Face Piece Stop Work	In the past two weeks there have been nine or more occurrences of facial rashes and/or odors both believed to be caused from the tight fitting face pieces.
1/22/2018	WRPS- PER- 2018- 0137	2225 concern with snow/ ice being transported on Nitrogen Dewar's being transported through labs CA contaminati on areas.	A concern was identified with snow/ ice being transported on Nitrogen Dewar's being transported through the labs CA contamination areas to 11A, melting and potential to cause slips ,trips or falls as well as being identified as a unknown spill. While that has been addressed through maint manager several process improvement suggestions were identified and brought to the 2225 ALARA committee for discussion. There was alternate methods identified that could reduce or eliminate this movement through the labs and need to dress/undress in anti-contamination clothing, reduce entries into radiological contaminated areas, need for support personnel, the physical handling of these Dewar's and increase efficiency of process to customers. The supervisor was submitted for EAPC safety award and some of needed equipment was ordered, this was back in March of 2017. The last piece of equipment needed to pilot the program is a forklift anti-slip fork attachment that has not yet been ordered. This per is to document the initiative and assign action to prioritize the procurement of this last piece of equipment to pilot and implement the suggested improvements in process. Also to track for ALARA suggestions/concerns.
1/22/2018	WRPS- PER- 2018- 0138	ensure QA review of ECN's when an MQIP is attached	During the approval process of WO# 295810, it was discovered that there was no Quality Assurance Review of ECN-713716 that has Modification Quality Inspection Plans (MQIPs). As per TFC-ENG-DESIGN-C-06, R L-2, Section 3.0, it states that "All Modification Quality Inspection Plans (MQIPs) shall be reviewed and approved by QA, and included in the modification by the Design Agent."

1/22/2018	WRPS-PER-2018-0139	enter procedure changes into WRAP was premature and requires more thought/input	During the review of PER Action for WRPS-PER-2017-1063.1, it was determined that the action to enter procedure changes into WRAP was premature and requires more thought/input than the PER contemplated. The changes need to be addressed in TFC-ESHQ-ENV-STD-02, TFC-PLN-33, TFC-OPS-WM-C-01, TFC-OPS-WM-C-27, and TFC-OPS-WM-C-31. The changes will help clarify the applicability of PCB definitions and define when PCB standards need to be followed. Most DST and SST wastes meet the definition of PCB Remediation waste; however, PCB regulatory requirements only apply to some wastes associated with the management of these wastes. This distinction needs to be clearly communicated to affected individuals.
1/23/2018	WRPS-PER-2018-0140	Mispositioned valve Discovered At ETF	Found UV-1A Inlet valve 60D-109 not fully open which caused a temperature difference of 10 degrees of flow thru UV-1A and UV-1B.
1/23/2018	WRPS-PER-2018-0141	Sustainable Solution For The Recording Of Video Imaging Needed	<p>The TOC needs to develop a sustainable solution for the recording of video imaging, due to changing technologies.</p> <p>Background: In-tank photography and videos have played a vital role in tank farm operations, surveillance, sampling, field crew and retrieval operations. In 2002 TOC changed standards from the use of Video cassette tapes (VHS) to using digital hard drives in field settings (e.g. DN-300 and DN-400). When videos were complete, the data from these hard drives was transferred to DVD by physical re-recording into a DVD recording deck. Similarly, control room settings, such as retrieval operations control rooms, were equipped with DVD recording decks for direct recording of in-tank images to DVD.</p> <p>In both cases, the end result was the production of a DVD-R disk to store the data.</p> <p>This also provided a means of distributing the data to engineers, program managers, DOE and others because of the portable nature of the DVD and because the enormous amount of data contained in a DVD cannot be effectively stored on the Hanford Intranet or elsewhere. It also cannot be emailed due to the enormous amount of data involved. Site servers specifically dedicated to video operations were investigated at the 2002 timeframe, but the limitations of data transfer rate and sheer size / storage capacity were cost preclusive. With technological improvements, this may no longer be an obstacle but that remains to be seen.</p> <p>Due to changing industry dynamics, DVD recording decks are being phased out by nearly all manufacturers at this time. Currently the DVD recording decks that are commercially available via internet searches are in used or refurbished condition. This is projected to be a short term issue as DVD recording decks are phased out entirely and support for maintenance wanes due to a lack of consumer demand.</p> <p>a system needs to be developed or maintained that allows the TOC to:</p> <ol style="list-style-type: none"> <li>1) effectively record video imaging in a manner that allows for portability of the finished product</li> <li>2) effectively capture still photos from the video images for analysis and reporting</li> <li>3) effectively archive video images in a durable manner that does not deteriorate over time.</li> <li>4) effectively transmit video image data to individuals who need it.</li> </ol>

1/23/2018	WRPS- PER- 2018- 0152	Process Area SPC Coating Has Cracks	During NCO surveillance of ETF-Safety RCRA Surveillance Procedure ( ETF-30-52748 ), the NCO noted that the SPC Coating in the Process Area had cracks between the UV/OX system and the Influent Filters.
1/23/2018	WRPS- PER- 2017- 2707	TF-17-QSR- 253: Observation	TF-17-QSR-253: Observation - The purpose of this surveillance was to perform a review to ensure that quality requirements from TFC-PLN-02, Part I, Requirement 18 "Audits/Independent Assessments" were being flowed down into the implementing procedure(s). Flow down of the requirements for the performance of assessments/audits is satisfactory. Procedure revision for minor procedure corrections/clarifications to TFC-ESHQ-AP-C-02 has proceeded and already approved through the WRAP process.
1/23/2018	WRPS- PER- 2018- 0153	Druck Pressure Calibrator Out of Tolerance	Druck Pressure Calibrator, Model # DPi610, Serial# 6101156911 (M&TE # 817-35-40-059) "As Found" reading during calibration was Out-Of-Tolerance. It was adjusted to manufacturer spec.

1/23/2018	WRPS- PER- 2018- 0154	Ashcroft Pressure Gauge Out of Tolerance	Ashcroft Pressure Gauge, Model# 2545C, Serial # 9232029 (M&TE# 817-31-04-083) "As Found" reading during calibration was "Out-Of-Tolerance. It was adjusted to manufacturer spec.
1/23/2018	WRPS- PER- 2018- 0155	Druck Pressure Calibrator Out of Tolerance	Druck Pressure Calibrator, Model #DP1610, Serial# 6102263101, (M&TE# 817-35-40-073) "As Found" reading during calibration was Out-Of-Tolerance. It was adjusted to manufacturer spec.
1/23/2018	WRPS- PER- 2018- 0156	Fluke Documentin g Process Calibrator Out of Tolerance	Fluke Documenting Process Calibrator, Model 744, Serial # 1474011 (M&TE # 820-13-20-006) "As Found" reading during calibration was Out-Of-Tolerance. It was adjusted to manufacturer spec.

1/23/2018	WRPS- PER- 2018- 0159	ETF Evaporator system alarm condition	@22:23-hrs the Evaporator System went from a RUN to Hot STBY condition without any Alarm indication / condition that generated this action. From review of the density meter trends on MCS historian; it appears that the change in states was due to AOV-601-108 not cycling OPEN when DT601106 reached the .970 dump set-point. Additional inspection / evaluation by Engineering, Maintenance, and Operations of the valve operation is needed to determine if further maintenance is imminently needed, software time-out extended for valve operation, or other actions needed such that reliable operation can be achieved for LERF Campaign-43 and future LERF Campaigns.
1/24/2018	WRPS- PER- 2018- 0160	MOP/ WSV C Farm walk down	During a Walk your Space MOP of C Farm the following issues were noted 1.0 House keeping along the east side of C farm near the fence. 2.0 Tumble weeds needed to be picked up near the fence line outside of the Contamination Area at Construction Change trailer. 3.0 Some Radiological signs needed to be replaced/added along the fence line.
1/24/2018	WRPS- PER- 2018- 0161	Stop Work on tight fitting face pieces periodic testing	Recently a stop work was issued on the use of tight fitting face pieces due to an above average number of workers experiencing facial irritation. Through the investigation and discussions to lift this stop work it was discovered that a procedure for periodic testing of various respiratory equipment was not in place. The program/procedure that was not in place was a corrective measure which was agreed upon to allow lifting a separate stop work related to respiratory equipment cleanliness from 2015. The corrective action program was not utilized to track completion of compensatory measures for removal of a stop work from 2015 and consequently the agreed upon actions per DOE-0343 step 5.0.4 were not completed.

1/24/2018	WRPS-PER-2018-0162	Work package 375141 did not have the correct piping identified	<p>Work package 375141 did not have the correct piping identified for A farm seal loop fiber optic camera inspection. Development of work package 375141 included a thorough walk-down, involvement of craft and engineering, along with a review of the available prints.</p> <p>The issue the team found was the old available prints did not have a level of detail to easily identify the correct piping in the field. The minimal print detail only identified a basic one inch line with cap, no other information was included. Further, the lack of comprehensive/readable tags in the field hampered the identification of the correct piping.</p> <p>Field walk-down(s) identified the only four 1 inch capped lines in the location identified by the prints (the remaining two lines were known to be buried). During field execution, A106 was chosen to be the first seal loop to be inspected. Once the activity was completed the visual results were unexpected and were discussed with management and engineering. The decision was made to move to A103 to gain further information.</p> <p>Set up activities started on A103, the FWS noticed a nearby short 1 1/2 inch capped riser. The FWS also noticed on the same line an old metal tag. The tag stated A103 seal loop fill line. The FWS then went to A106 and found another 1 1/2 inch line configured the same as A103, but with an exposed valve with the same old metal tag stating A106 seal loop fill line. Upon investigation an additional two 1 1/2 inch lines configured the same as A103 and A106 were found. Engineering believed from the initial field walk-downs the last two lines would be buried. The four newly identified 1 1/2 inch lines all varied in above ground exposure because large quantities of dirt was poured in different areas of A farm. During the planning walk-down(s) the team was only searching for 1 inch lines per the available prints.</p>
1/24/2018	WRPS-PER-2018-0142	Additional actions Taken Or Recommended	<p>Project Administrative Procedures Need Aligned</p> <p>An independent assessment, FY2018-WRPS-I-0004 was performed on the Projects organization in January of 2018 examining the Commissioning process with a special look at testing and turnover.</p> <p>This PER was generated as a result of an observations from this assessment.</p> <p>The Projects organization is complex with many interfaces. For example, Commissioning is within the Project organization, yet the turnover process is owned and performed by the Engineering, Procurement, and Construction Project Execution organization (EPC). The governing procedures have different owners; the impacted organizations work very hard to integrate Commissioning and turnover activities, but this effort begs the question: why is this integration effort required when the work scope could be combined into one organization?</p> <p>There is a Construction Management organization that oversees work done by subcontractors (typically "greenfield" work or work that plant forces cannot perform because of Davis-Bacon requirements) and there is a Project Management organization that can oversee both plant forces work and subcontractor work. The Construction Management procedures are separate from the Project Management procedures and owned by different people. There is no overarching "Rosetta Stone" description of the overall approach to this division to Project Management. The "Purpose and Scope" sections of the procedures could be useful to describe the differences, but they are not aligned between organizations. A review of TFC-PRJ-CM-C-01, REV B-11, Construction Management and TFC-PRJ-PM-C-02, REV F-1, Project Management reveals a very different approach to the scope and purpose of the procedures.</p> <p>During interviews with management in Projects and the Project Management Office (integrated with the Projects organization but overseen by EPC), this approach appears to be a legacy issue; there have been reorganizations following the retirement of some key personnel that have not been reflected in the procedures.</p> <p>An effort should be made to better align the current procedures with respect to roles and responsibilities, and purpose and scope to improve the flow of interfacing processes within the organization.</p>
1/24/2018	WRPS-PER-2018-0143	TFC-PRJ-CM-C-16 Needs Revised to Reflect Retention of Site Form Records	<p>TFC-PRJ-CM-C-16 Needs Revised to Reflect Retention of Site Form Records</p> <p>An independent assessment, FY2018-WRPS-I-0004 was performed on the Projects organization in January of 2018 examining the Commissioning process with a special look at testing and turnover.</p> <p>This PER was generated as a result of an observations from this assessment. It is suggested that the assignee review the section noted in the description of the issue to understand the context of the issue.</p> <p>Two forms used in TFC-PRJ-CM-C-16, REV B-4, Construction Acceptance Testing, are records but are not identified as such within the procedure. The rationale for this is because the forms become part of a record, the work document. There is no positive step in the procedure to ensure that these forms are retained as part of the work document. (Section 5.2.2)</p>

1/24/2018	WRPS- PER- 2018- 0144	TFC-PRJ-CM- C-01 Needs Roles and Responsibilities Aligned	<p>TFC-PRJ-CM-C-01 Needs Roles and Responsibilities Aligned</p> <p>An independent assessment, FY2018-WRPS-I-0004 was performed on the Projects organization in January of 2018 examining the Commissioning process with a special look at testing and turnover.</p> <p>This PER was generated as a result of an observations from this assessment. It is suggested that the assignee review the section noted in the description of the issue to understand the context of the issue.</p> <p>The responsibilities for the Task Construction Manager and the Construction Field Lead are ambiguous and makes the chain of command in the case of an "abnormal occurrence" unclear. (Section 5.2.2)</p>
1/24/2018	WRPS- PER- 2018- 0145	Three Commissioning Procedures need References Aligned	<p>Three Commissioning Procedures need References Aligned</p> <p>An independent assessment, FY2018-WRPS-I-0004 was performed on the Projects organization in January of 2018 examining the Commissioning process with a special look at testing and turnover.</p> <p>This PER was generated as a result of an observations from this assessment. It is suggested that the assignee review the section noted in the description of the issue to understand the context of the issue.</p> <p>Three procedures, TFC-PRJ-SUT-C-03, REV C-5, Conduct of Testing, TFC-PRJ-SUT-C-01, REV F, Test Plan Preparation, and TFC-PRJ-SUT-C-02, REV E-4, Operational Acceptance Test Preparation were found not to conform to the requirements for References in TFC-BSM-AD-STD-05, Administrative Document Format and Preparation Standard. (Section 5.2.2)</p>
1/24/2018	WRPS- PER- 2018- 0146	T1P82-PTD- 005 Contains Three Errors	<p>T1P82-PTD-005 Contains Three Errors</p> <p>An independent assessment, FY2018-WRPS-I-0004 was performed on the Projects organization in January of 2018 examining the Commissioning process with a special look at testing and turnover.</p> <p>This PER was generated as a result of an observations from this assessment. It is suggested that the assignee review the section noted in the description of the issue to understand the context of the issue.</p> <p>Three errors were identified in T1P82-PTD-005, T1 P82 DST In-Pit Heating AP Farm Project Turnover Document, REV 1. (Section 5.3.3)</p>

1/24/2018	WRPS- PER- 2018- 0147	Work Orders 205228 and 219697 (Archived) Have Errors	<p>Work Orders 205228 and 219697 (Archived) Have Errors</p> <p>An independent assessment, FY2018-WRPS-I-0004 was performed on the Projects organization in January of 2018 examining the Commissioning process with a special look at testing and turnover. This PER was generated as a result of an observations from this assessment. It is suggested that the assignee review the section noted in the description of the issue to understand the context of the issue.</p> <p>Three errors were identified in two work packages associated with T1P82, DST In-Pit Heating AP Farm Project, work order 205228 and work order 219697. (Section 5.3.3)</p>
1/24/2018	WRPS- PER- 2018- 0148	RPP-CALC- 60204, REV 1 Has Incorrect Numbered Document	<p>RPP-CALC-60204, REV 1 Has Incorrect Numbered Document</p> <p>An independent assessment, FY2018-WRPS-I-0004 was performed on the Projects organization in January of 2018 examining the Commissioning process with a special look at testing and turnover. This PER was generated as a result of an observations from this assessment. It is suggested that the assignee review the section noted in the description of the issue to understand the context of the issue.</p> <p>An error was identified in RPP-CALC-60204, REV 1; a calculation within this document had the incorrect number. (Section 5.3.3)</p>
1/24/2018	WRPS- PER- 2018- 0149	Improvement Identified for Project Management Qualification Card	<p>Improvement Identified for Project Management Qualification Card</p> <p>An independent assessment, FY2018-WRPS-I-0004 was performed on the Projects organization in January of 2018 examining the Commissioning process with a special look at testing and turnover. This PER was generated as a result of an observations from this assessment. It is suggested that the assignee review the section noted in the description of the issue to understand the context of the issue.</p> <p>During a review of T1P167, Modification to the Service Water System in 241-AP, a training issue was identified that would lead to an improvement in the training of Project Managers. (Section 5.4.5)</p>

1/24/2018	WRPS- PER- 2018- 0150	Assessment Corrective Action Needs Institutional- ized into Qualifica- tions	<p>Assessment Corrective Action Needs Institutionalized into Qualifications</p> <p>An independent assessment, FY2018-WRPS-I-0004 was performed on the Projects organization in January of 2018 examining the Commissioning process with a special look at testing and turnover.</p> <p>This PER was generated as a result of an observations from this assessment. It is suggested that the assignee review the section noted in the description of the issue to understand the context of the issue.</p> <p>Four self-assessments were reviewed from 2016 and 2017 that corresponded to the topics of the assessment:</p> <ol style="list-style-type: none"> <li>1. FY2016-EPC-S-0324, Project Turnover Program</li> <li>2. FY2017-EPC-S-0324, Project Management Program</li> <li>3. FY2017-TFP-M-0112, Initial Testing Assessment Report</li> <li>4. FY2017-ENG-M-0130, Implementation of Test Plans and Development of the Test Requirements Matrix for TF Projects</li> </ol> <p>One observation was noted for the corrective actions for FY2017-TFP-M-0112: institutionalize the corrective actions so future employees could benefit from them. (Section 5.5.2)</p>
1/24/2018	WRPS- PER- 2018- 0151	Project Navigator Needs Documentat- ion for those Requiremen- ts that are "Not Applicable"	<p>Project Navigator Needs Documentation for those Requirements that are "Not Applicable"</p> <p>An independent assessment, FY2018-WRPS-I-0004 was performed on the Projects organization in January of 2018 examining the Commissioning process with a special look at testing and turnover.</p> <p>This PER was generated as a result of an observations from this assessment. It is suggested that the assignee review the section noted in the description of the issue to understand the context of the issue.</p> <p>Project Navigator does not require any attachments when a requirement is not applicable. A short text document stating why a particular project is exempt from the requirements outlined would be helpful to document how the graded approach to these requirements was implemented. (Section 5.5.3)</p>
1/24/2018	WRPS- PER- 2018- 0163	Labeling match to procedure	<p>For K1 and K2 system the Ventilation Control System labeling does not correctly match the TF-OR-PWR-03 SOE rounds procedure readings. Engineering is aware of the discrepancy.</p>

1/24/2018	WRPS-PER-2018-0164	MOP/WSV Review of Standard TFC-ENG-STD-40 and alarms	I performed management observation and brief review of standard TFC-ENG-STD-40 "Alarm Management and Annunciator Panel for Process Control Systems" revision process with I&C Manager and Cog. System Engineer (CSE) for monitoring control system (MCS). A revision was being processed to update this Standard by introducing additional color relating to Alarm Priority Levels. The driver for this standard change was due to an update implemented by RPP-PLAN-60000 Rev.1 "Tank Farm Plant Installed Software Alarm Strategy" where a new color was introduced as result of implementing asset monitoring feature during alarm rationalization. After a detail review and discussing with CSE, it was determined that updating the TFC-ENG-STD-40 is not required as ABB system including AMS industry guides allow for multiple asset colors where operator alarm colors do not have to be changed and supported by existing TFC-ENG-STD-40. It was also determined that RPP-PLAN-60000 Rev.1 "Tank Farm Plant Installed Software Alarm Strategy" document for alarm priority should be revised to become consistent with the existing TFC-ENG-STD-40 for alarm priority levels.
1/24/2018	WRPS-PER-2018-0165	MOP/WSV LTCA and corrective actions	During a management observation related to Long Term Corrective Actions (LTCA), it was observed that the PER procedure, TFC-ESHQ-Q_C-C-01, contains the following requirement "corrective actions directly addressing a cause determined in an apparent cause analysis or root cause analysis cannot be designated as LTCA," yet there are multiple actions currently in LTCA status that are tied to a cause.
1/24/2018	WRPS-PER-2018-0166	MOP/WSV 242A ECN and work packages and PFWR	<p>I chose this month to look at the process of performing an Engineering Change Notice (ECN) and incorporating the ECN into work instructions at the 242-A Evaporator (ECN-712473). I chose to interview (b)(6) about the ECN process and how it correlated to getting work completed for a project at 242-A in which we are upgrading a Continuous Air Monitor (CAM) tied to the facility Vessel Vent. The work as described by the ECN consists of removing the old AMS-3 unit and upgrading it to a new AMS-4 unit which is standard across the Tank Farms complex. The ECN also requires the alpha CAM and a timer be removed as well as modification and installation of a small amount of new piping.</p> <p>I was specifically interested in the incorporation of the ECN into the Work Package to witness how engineering staff interfaced with Operations/Maintenance staff to ensure that the ECN instructions were clearly understood at this pass-off point. I was able to attend a Team Planning Meeting (TPM) where the details of the ECN and work instructions prepared by our Planning group were reviewed by a multi-discipline team of both engineering, safety and health, maintenance, etc. One of the questions that was asked of (b)(6) was concerning the performance of a Plant Forces Work Review (PFWR) and if it had been completed for the work at this point. (b)(6) were not aware of a PFWR and nor did they know or understand what this review entailed or why it was needed. I decided to dig into this process a little deeper to see what the requirements were for completing a PFWR and why (b)(6) didn't recognize this terminology.</p> <p>I started by interviewing two separate (b)(6) to assess their knowledge of a PFWR and how and when (b)(6) performed this review. Neither of (b)(6) knew what a PFWR was and indicated that they had never performed a PFWR and nor had (b)(6). This seemed quite strange to me because 242-A Maintenance/Operations had specifically (b)(6) perform this PFWR. I also interviewed (b)(6) with the same results of never having seen or heard of the PFWR. I chose to branch out a bit and talk to (b)(6) within (b)(6) in different groups to see what their level of understanding was and how many PFWRs they had done in the past. Not surprisingly the theme continued with the results showing that nearly all of (b)(6) interviewed had never worked through this process. Out of 10 (b)(6) interviewed, I only found one who had performed a PFWR and he indicated that he performed them, but not on a high frequency.</p> <p>My next step was to dig into our procedures to ascertain what the driver for performing a PFWR was. In TFC-OPS-MAINT-C-01, Tank Operations Work Control, section 4.3.1 discusses preparation of a level 1 work package. Step 3 states the following:</p> <p>PFWR Point-of-Contact (POC) is to Generate a Plant Forces Work Review (PFWR) if required by TFC-BSM-HR_EM-C-05.</p> <p>So who is the PFWR POC?</p> <p>I interviewed (b)(6) that initially asked if the PFWR had been completed in our TPM and the individual indicated that engineering is always the organization that performs a PFWR. (b)(6) also indicated in a separate interview that (b)(6) typically prepares the PFWR. Again, I thought this strange as none of (b)(6) I had interviewed had ever heard of the PFWR.</p> <p>I turned my attention towards TFC-BSM-HR_EM-C-05, PLANT FORCES WORK REVIEW (DAVIS-BACON ACT COMPLIANCE) to see if there was direction on whom is responsible for the PFWR. The procedure calls for a "Responsible Person" to prepare the PFWR documentation and forward it to the area work review agent. The procedure is vague pointing to who prepares the form and dictates that any responsible person could prepare it.</p>

1/25/2018	WRPS- PER- 2018- 0167	ETVS reporting has undergone several software changes between version 1.0 and 1.6 without updating the Software Management PI	The Electronic Time Verification System Reporting (ETVS-Report), HIS#: 3528 application was routed to Quality Assurance (QA) through the HISI approvals. During the review of ETVS-Report-SCR 3528-26 and Acceptance Test Report: RPP-57198, Rev. 05 it was identified that the application has undergone several software changes between version 1.0 and 1.6 without updating the Software Management Plan (SMP). This was able to happen because the SMP does not adequately address configuration control in the configuration management section. In addition, several of the sections include outdated information. For example, I was unable to assess which items in Section 2.11 Acquisition, should be applied and which were only applicable to version 1.0.
1/25/2018	WRPS- PER- 2018- 0195	Bentley notified WRPS of software critical error 798781 affecting Bentley AutoPIPE	Bentley notified WRPS of software critical error 798781 affecting Bentley AutoPIPE. AutoPIPE has been used to analyze both general service and safety significant piping used in TOC SSCs. This software critical error may produce non-conservative results for analysis of ASME Section III, Div 1, Subsections NC or ND for Class 2, and 3 components and piping respectively.
1/25/2018	WRPS- PER- 2018- 0196	jumpers on review sheet did not have a TOC Catalog ID tag on it	A request by Engineering to walk down the WRPS jumpers located in 2101-M warehouse. It was noticed that one of the jumpers on the review sheet did not have a TOC Catalog ID tag on it to make it easily identifiable. A call to the warehouse was made to add the current Catalog ID 583842 to the jumper.

1/25/2018	WRPS- PER- 2018- 0157	#2 Procedures TFC-ESHQ- Q_PP-P-02 "Quality Assurance Surveillance s" and TFC- ESHQ-Q_C-C- 01 "Problem Evaluation Reports (PERs)"	Procedures TFC-ESHQ-Q_PP-P-02 "Quality Assurance Surveillances" and TFC-ESHQ-Q_C-C-01 "Problem Evaluation Reports (PERs)", were reviewed to see if the TFC-ESHQ-Q_PP-P-02, Section 4.5 "Surveillance Reporting", Item 4 was being implemented as specified. Procedure TFC-ESHQ-Q_PP-P-02 requires that the Quality Surveillance Report (QSR) number be entered in the Source Document Number field of the PER. There was one finding and one observation. The purpose of this PER was to document the identified finding.  FINDING 01: Procedure TFC-ESHQ-Q_PP-P-02 requires QA personnel to enter the QSR number into the Source Document Number field. Several QSRs and PERs were reviewed indicating a noncompliance to the requirement.
1/25/2018	WRPS- PER- 2018- 0158	Procedures TFC-ESHQ- Q_PP-P-02 "Quality Assurance Surveillance s" and TFC- ESHQ-Q_C-C- 01 "Problem Evaluation Reports (PERs)".	Procedures TFC-ESHQ-Q_PP-P-02 "Quality Assurance Surveillances" and TFC-ESHQ-Q_C-C-01 "Problem Evaluation Reports (PERs)", were reviewed to see if the TFC-ESHQ-Q_PP-P-02, Section 4.5 "Surveillance Reporting", Item 4 was being implemented as specified. Procedure TFC-ESHQ-Q_PP-P-02 requires that the Quality Surveillance Report (QSR) number be entered in the Source Document Number field of the PER. There was one finding and one observation. The purpose of this PER was to document the identified observation.  OBSERVATION 01: Procedure TFC-ESHQ-Q_PP-P-02 requires QA surveillance personnel to enter the QSR number into the Source Document Number field within the PER. However the PER procedure (TFC-ESHQ-Q_C-C-01) does not acknowledge the presence of a Source Document Number field. Actually, in addition to not mentioning a Source Document Number field, TFC-ESHQ-Q_C-C-01, Section 4.3 procedure also does not mention other fields that are to be completed by the PER Originator. These other fields are: System Identification, Equipment Identification Number, Requirement Not Satisfied, and Recommended Corrective Action.
1/25/2018	WRPS- PER- 2018- 0201	DOE 0343 was violated when a stop work was lifted without concurrence from initiator.	DOE 0343 was violated when a stop work was lifted without concurrence from initiator. On January 17th, 2018 an NCO initiated a stop work with the following criteria. One, no issuance of respiratory face pieces dated prior to 1/17/18. Secondly, within two weeks develop and initiate a sampling program, along with first set of samples taken for face pieces prior to and after 1/17/2018.  Management lifted stop work without following through on commitment of the second criteria of initial stop work.

1/25/2018	WRPS-PER-2018-0202	Expired SIHAs Listed As Active On Safety Website	<p>Worker brought an issue to my attention and after further review of expired SIHA the following concerns were identified: The GHA/SIHA/JHA web page gives information that rev 16 and later SIHA's are active for two years, all others are reviewed on a yearly basis.</p> <p>There are several SIHA's that are after the rev 16 that are more than a year old and still actively being used. The site form A-6004-101 and Job Hazard Analysis instructions are silent to any age limitations or review frequencies and were found in reviewing procedure TFC-ESHQ-5_SAF-C-02 Job Hazard Analysis. (Ensure that a review and update of standing JHA checklists is performed and documented by appropriate Supervisor and SME's on a bi-annual basis).</p> <p>The procedure only allows for a bi-annual review and does not identify annually or every two years. It also says remove any standing JHA checklist from the WRPS Safety-Health Programs Web Page if expired. While leaving them on web page and identifying as active or inactive seems equivalent, it is not being maintained or reflected in procedure. It seems there are conflicting directions and responsible personnel are not reviewing and getting this information to the central safety group for inclusion and updating. This may have allowed work to commence with expired SIHA's. Also SIHA's without the proper reviews and updates at frequencies required. This is a quick review and attempt to capture but extent of condition would have to be performed to validate.</p> <p>SIHA -0174 Annual inspection of dumbwaiter as active but signed date of 10/30/2015 which would be over the two years. When pulling it up it shows signed in 10/19/17 so web page needs updated to reflect current revision/update.</p> <p>SIHA-0175 Inspect and Clean Room 2B Hood 16 Strainer as active but signed 12/08/15 which would be over the two years. When pulling it up it reflects same. Unsure if used in field.</p> <p>SIHA-0162 Replace HEPA Filters and/or pre-filters in lab room hoods as expired and signed date of 04/06/15 When pulling it up it reflects same. We have performed recent work under this. Talking with FWS they informed me updated in package but unsure how linked to update on web page when it says expired SIHA's cannot be used until they are updated and show "ACTIVE" status on the list below.</p> <p>SIHA-0172 Breather Filter Aerosol Test as active but signed date of 1/21/16 which would be over the two years. When pulling it up it reflects the same. Unsure if being used in field. when it says SIHA's cannot be used until they are updated and show "ACTIVE" status on the list below.</p> <p>SIHA-0095 Vent and Balance Activities at 242A to include stack flows, Aerosol Testing of hot cell exhauster/stack/vessel vent/inlet filters as active but signed date of 12/29/15 which would be over the two years. When pulling it up it reflects the same. Unsure if being used in the field.</p> <p>SIHA-0100 Grab Sample as active but signed date of 8/29/15 which would be over the two year period. When pulling it up it reflects the same.</p> <p>SIHA-0106 POR HEPA filter change on POR in C-Farm as active but signed date of 08/19/15 which would be over the two year period. When pulling it up it reflects the same. Unsure if used in field.</p>
1/25/2018	WRPS-PER-2018-0203	ETF-PRO-001 was not followed when An Administrative lock was removed and replaced on a system	<p>An Administrative lock was removed and replaced on a system during the execution of work package 382180. ETF procedure ETF-PRO-001 was not followed during this activity in that the original lock should have been cleared and a new one installed after completion of the work package.</p>
1/25/2018	WRPS-PER-2018-0204	(b)(6) communicated that they are not comfortable with using ISC forms with the previous revision	<p>(b)(6) communicated that they are not comfortable with using ISC forms with the previous revision number, even though the ISC forms in question were approved prior to the form revision.</p> <p>WRPS-MOP-2018-0065</p>

1/25/2018	WRPS-PER-2018-0206	ISC forms for PMs are not consistently included in the work packages.	ISC forms for PMs are not consistently included in the work packages. Some teams verify the completed ISC form and implement controls as required, but do not include the ISC form with the PM work package. Other teams require that the ISC form be included in every work package.  WRPS-MOP-2018-0065
1/25/2018	WRPS-PER-2018-0205	2225 Loss of Air Handling Units while performing transmitter PM.	Air Handling Units (AHU-1, AHU-3, and AHU-4) at the 222-5 Labs unexpectedly shutdown, while all three Electric Exhaust Fans remained in service. Exhaust plenum pressure was maintained during this time. Maintenance was being performed on exhaust plenum transmitters.
1/25/2018	WRPS-PER-2018-0207	LOTO Boundary Violation At MO-280	Construction activities were in progress at MO-280 just outside of west area. Two individuals requested to visit the construction site and were told to enter the facility from the south door. When the individuals arrived they entered through the east doorway. The stairs up to the east door were posted "door closed use south door for entry". At the top of the stairs the east entry doors were open with two candle sticks, rope, and a "Danger Lock and Tag boundary" signage attached.

1/29/2018	WRPS-PER-2018-0211	ISC Form Record Requirements	It's unclear to the users if the ISC forms themselves are record documents or if the ISC form becomes a record document because it is included in the work package.  WRPS-MOP-2018-0065
1/29/2018	WRPS-PER-2018-0212	Minor improvements are needed on the instructions for the ISC forms	Minor improvements are needed on the instructions for the ISC forms. Section V Approval reference the wrong page for the required signatures and the section used the term "reviewer" when it should be "checker".  WRPS-MOP-2018-0065
1/29/2018	WRPS-PER-2018-0213	ISC Form DA Signature	Obtaining the DAs signature is cumbersome and time consuming. The process relies on the Area Engineer to hand deliver or scan and email each ISC. The recommendation from the Area Engineers is to eliminate the DA signature for those ISC forms that do not identify the need for controls. Recommend classifying this PER as a PIE/CIM.  WRPS-MOP-2018-0065

1/29/2018	WRPS-PER-2018-0214	WORA checklist questions can only be answered with Yes or NA	The WORA checklist questions can only be answered with Yes or NA. The preference from personnel interviewed was that the questions allow for an answer of Yes, No or NA. Recommend classifying this PER as a PIE/CIM.  WRPS-MOP-2018-0065
1/29/2018	WRPS-PER-2018-0215	ISC Form in Fire Systems, RES, Utilities Work Packages	Outside services, such as but not limited to utilities and the fire department, arrive with their own work packages that may or may not include an ISC form. Those packages that include an ISC form for outside services are typically blank. The CE staff must remember that an ISC form is needed when reviewing packages from outside services. The checks and balances in place (WORA) for the WRPS work package development and approval are bypassed by outside services work packages.  Note - Corrective Maintenance from non-WRPS contractors is excluded from the WRPS work control processed.  WRPS-MOP-2018-0065
1/29/2018	WRPS-PER-2018-0216	5Y-03C Leak Detection Pit Level Greater than Maximum Authorized Level	241-5Y-03C has exceeded the maximum authorized dip tube level of 23 inches. As of 01/24/2018, the recorded level in the leak detection pit was 24.8 inches.

1/29/2018	WRPS- PER- 2018- 0198	242-A Evaporator C-A-1 Vessel Flammable Gas Control System 4	<p>Performance Assessment for the 242-A Evaporator C-A-1 Vessel Flammable Gas Control System carried out Nov 2017 through Dec 2017 RPP-TE-58436.</p> <p>The flow switches were found to be out of tolerance during as-found calibration checks and it appears the switches were calibrated back within tolerance without an evaluation of their operability. Out of tolerance conditions must be properly evaluated to ensure an instrument is not failing, as would be the case with excessive drift.</p> <p>Note there were no observed issues with operability based on the above evaluation of the out of tolerance conditions.</p>
1/29/2018	WRPS- PER- 2018- 0197	242-A Evaporator C-A-1 Vessel Flammable Gas Control System 3	<p>Performance Assessment for the 242-A Evaporator C-A-1 Vessel Flammable Gas Control System carried out Nov 2017 through Dec 2017 RPP-RPT-58436 and RPP-TE-58437.</p> <p>The functional test record for TF-FT-680-022 covering campaign 2013-1 has not been located. For this review, the assumption has been made that this test was performed and that the record is missing.</p>
1/29/2018	WRPS- PER- 2018- 0199	242-A Evaporator C-A-1 Vessel Waste High Level Control System 2	<p>Performance Assessment for the 242-A Evaporator C-A-1 Vessel Waste High Level Control System RPP-TE-58437.</p> <p>PDT-CA1-4 was found to be out of tolerance (high) during as-found testing 2 out of the 5 calibration checks as shown in Attachment C. From the calibration data graph, there is a clear trend which shows the DP transmitter measurements are drifting high. This is in the conservative direction for the high flow trip but the cause of the drift should be evaluated further to prevent spurious trips and ensure instrument operability.</p>

1/29/2018	WRPS- PER- 2018- 0200	242-A Evaporator C-A-1 Vessel Waste High Level Control System	<p>Performance Assessment for the 242-A Evaporator C-A-1 Vessel Waste High Level Control System RPP-TE-58437</p> <p>The flow switches and DP transmitters were found to be out of tolerance during as-found calibration checks and it appears the devices were calibrated back within tolerance without an evaluation of their operability. Out of tolerance conditions must be properly evaluated to ensure an instrument is not failing, as would be the case with excessive drift.</p> <p>Note there were no observed issues with operability based on the above evaluation of the out of tolerance conditions.</p>
1/29/2018	WRPS- PER- 2018- 0217	Work Hours	<ol style="list-style-type: none"> <li>1. Contrary to the requirements identified in TFC-ESHQ-S_SAF-C-03, Control of Working Hours and Working Alone, employee exceeded working 14 days consecutively without at least two consecutive days of rest before the next work day.</li> <li>2. Immediately after recognizing the discrepancy, RCFLM contacted HR/LR to discuss options available.</li> <li>3. HR/LR provided guidance to send employee home and code absence as A-Time.</li> <li>4. Financial Compliance provided guidance that A-Time isn't approved for this situation.</li> <li>5. Contrary to the requirements identified in TFC-ESHQ-S_SAF-C-03, Control of Working Hours and Working Alone, Level 2 Manager request to exceed administrative requirements wasn't requested nor approved. Evaluation and direction should have been requested thru line organization.</li> </ol>
1/29/2018	WRPS- PER- 2018- 0218	Employee back into Ballard when leaving B Complex	Employee back into Ballard when leaving B Complex. to return to the shop for lunch.

1/29/2018	WRPS- PER- 2018- 0219	PM documents within SmartPlant remain open for modifications	SmartPlant does not allow PM Documents to be further modified by the originator/submitter once the document reaches the PM Coordinator's review and approval step. This prevents the Originator/Submitter from being able to incorporate the PM Coordinator's comments into the document without the PM having to go back through the entire approval process again. Locking PMs once the document gets to the PM Coordinator was only recently implemented into SPF. I understand the intent behind it was to prevent unapproved modifications from being made to PM Documents. While I agree that the majority of changes made to PMs after they have been approved by the designated Responsible Approvers should be reviewed and approved again, some of the modifications requested by the PM Coordinators are minor and do not require another round of review and approvals. Examples of this would be if the PM Coordinator requests the approved ISC Screening form be attached or request that the page order of the Record PDF be changed.
1/29/2018	WRPS- PER- 2018- 0221	revision number cannot be changed or corrected	In SmartPlant, when a new revision of a PM Document is created the revision number cannot be changed or corrected after the revision is initiated. This becomes an issue if a previous revision of the PM was created then terminated, the next revision created will not default to the correct next revision number that proceeds the current revision number. (Example, if the current revision is rev. 1 and a new rev. 2 was created then terminated when the next revision of the PM is created the revision number will default to rev. 3). If the originator fails to correct the revision number in this initial revision creating step they are not able to correct this without terminated the revision and starting a new one.
1/29/2018	WRPS- PER- 2018- 0224	LOTO LEF-18-005	On 1/29/2018 at 0930 during installation of LOTO LEF-18-005 at ETF the CO Verifier determined that lock three was incorrectly placed on breaker 22 and not on breaker 24 as indicated on the TAF.

1/29/2018	WRPS-PER-2018-0210	special tool evaluation process has several problems	<p>The special tool evaluation process has several problems:</p> <ol style="list-style-type: none"> <li>1.The special tool evaluation form is not intended to design new special tools (i.e. drawings and calculations). However, several tools were created solely by using the special tool evaluation form.</li> <li>2.Our procedures do not clearly explain how to design a special tool, and what requirements it must meet.</li> <li>3.Clear instructions were available in TFC-OPS-MAINT-C-03, Rev A-11, but were removed in the next revision.</li> <li>4.Removal of instructions regarding special tools from TFC-OPS-MAINT-C-03 were not flowed down correctly into TFC-ENG-DESIGN-C-34.</li> </ol>
1/29/2018	WRPS-PER-2018-0226	Qual Card Biennial Review	<p>In accordance with TFC-BSM-TQ_ADD-C-01 Conduct of Training Administration, All TIM (Training Implementation Matrix) related training programs/materials are required to have a biennial review. Existing Qualification Cards for current TIM positions were reviewed for last updated date. The following have exceeded their 2 year review dates:</p> <p>Shift Technical Engineer qual card 350505 was last revised in September 2014. It is currently with SME for review for updating.</p> <p>TOC Radcon First Line Manager qual card 350095 last revised June 2014!!</p> <p>QA Engineer qual card 350885 was last updated August 2015, however, this position is being replaced by Nuclear QA Engineer with a new qual card.</p> <p>HPT Core Qualification 356425 was last updated September 2014</p> <p>222-S Analytical Data Quality Representative qual card was last updated April 2015</p>
1/29/2018	WRPS-PER-2018-0227	Maintain performance of weekly radiological routine LE-W065 to help identify future contamination issues	<p>During the performance of a Scheduled Radiation Survey Task Description (LE-W065) at ETF, contaminated tumbleweed fragments were discovered.</p> <p>Total Contamination of:</p> <p>LERF Catch Basin 42 &amp; 43 (Radiological Buffer Area):</p> <p>Location # 1: 19,870 dpm/100 cm2 Beta-Gamma and 21 dpm/100 cm2 Alpha.</p> <p>No removable contamination was detected. The locations were decontaminated.</p> <p>Survey results are documented in Survey Simple on survey # LE-1800205</p>

1/29/2018	WRPS-PER-2018-0229	Lack of consistency across WRPS in software quality assurance.	Lack of consistency across WRPS in software quality assurance.
1/29/2018	WRPS-PER-2018-0228	2225 Standing Fall Protection Work Permit approved for use on 8/25/16 that is valid until Jan. 2019 not following DOE-0346	In lieu of recent ladder use issues at 2225 a further evaluation discovered the following: There has been a (SFPWP) Standing Fall Protection Work Permit generated and approved for use specific to various work activities performed at 222-5 complex where their feet are at or above 6' on the ladder. While this is a beneficial tool, it is not following the requirements outlined in DOE-0346 for re-review and approval process. The example attached was developed 08/24/16 and approved on 8/25/16 with same issue date. There is a typed/ added note in section one stating This FPWP is valid until January 1, 2019 and posted on the WRPS fall protection web page. This could be used on level 4 work where there is no package of formal pre-job to review. The procedure states Valid for no longer than one year from date approved. This does not show that it was re-reviewed, updated by listed personnel and submitted for re-approval with new dates. example attached.
1/29/2018	WRPS-PER-2018-0230	Paint/fix chipping paint on the FCAs listed and install new posting at FCA E-45-012.	Findings for Fixed Contamination Areas: E-40-024 at 204-AR PPE shed foundation paint is chipping. E-40-028 at 204-AR rail road tracks paint is chipping. E-95-022 at 244-AR-40 Diversion Box pit covers paint is chipping. Fixed Contamination Area E-45-012 Steam line support post N. of 244-AR FCA posting needs replaced.

1/29/2018	WRPS- PER- 2018- 0222	ETF Radiological Control monthly routine surveillance #LE-M011 was not performed in December 2017	<p>The ETF Radiological Control monthly routine surveillance #LE-M011 was not performed in December 2017 as required.</p> <p>This routine is to inspect/source check portable instruments in the Emergency Kit(s) located in 2025EA.</p> <p>The ETF RadCon routine completions are tracked on a wall chart that is a 5 Week running calendar. It is laid out to show what routine surveillances the ETF Shift HPTs are responsible for and when they are due.</p> <p>As the weeklies, monthlies and quarterlys are completed, they are "blacked out" on the 5 Week schedule.</p> <p>Apparently, when the completion chart got revised with the new 5 weeks schedule, LE-M011 was "blacked out" by mistake.</p>
1/29/2018	WRPS- PER- 2018- 0223	calibration stickers that are fading quickly	<p>HPT Instruments, specifically P-11 Probes have calibration stickers that are fading quickly with use. The stickers seem to be satisfactory during daily source checks and then fade quickly during high use at the Control Point .</p>
1/29/2018	WRPS- PER- 2018- 0231	emergency light notifications	<p>During the OPs acceptance of the emergency light monthly package for ETF for December. The SOM on duty noticed the step 5.1.13.5 of procedure 3-EMER-316 that states notify CSM to contact environmental of failed emergency lights if found. After talking with a central shift manager it doesn't appear that this is consistently happening across the TOC. Facility owns the bulk of these and I'm sure they are working to this procedure as well, as is 242A which with ETF have the bulk of the rest (odds and ends exceptions of course) this was discussed today after our PCO and I believe we should look into it from a extent of condition and to whether the statement to notify environmental is truly needed.</p>

1/29/2018	WRP5- PER- 2018- 0232	278AW water heater	278AW water heater is not able to provide a sufficient amount of hot water for respiratory equipment cleaning activities.
1/29/2018	WRP5- PER- 2018- 0233	debris in tight fitting face piece	Workers in AY2 change trailer experienced debris in tight fitting face piece after donning SCBA. Workers performed pre-use inspection of face piece and did not identify any debris prior to donning.
1/29/2018	WRP5- PER- 2018- 0234	Inconsistanc es were identified during review of WRAP Workflow, including improvement s/effecienci es using graded approach	Initial review determined that inconsistencies exist between the current Major/Minor technical procedure change WRAP Workflow and other supporting 222-5 Labs documentation (e.g., ATS-310, 1.41 includes review processes that are not consistent with Workflow). Also, while evaluating the Major/Minor technical procedure change WRAP Workflow against the TOC Minor change (PCA) WRAP Workflow, many process improvements or efficiencies became apparent with regard to consistent execution and application of a graded approach. From these reviews, An Initial DRAFT revised 222-5 Lab Wrap Workflow (Minor change only) was developed and is attached.

1/30/2018	WRPS- PER- 2018- 0225	Surveillance QA Controls over gas standards	Clarification is being sought regarding controls over a gas standard/cal gas preparation procedure being performed by a subcontractor (GD Environmental Supplies; GDE). A set of questions and recommendations were prepared after a review of the GDE preparation procedure (Standards from Pure Products, Rev. 1). These are included as Attachment 4 in the associated QA Surveillance report, TF-17-QSR-021, Vapors – Review of GD Environmental Supplies Gas Standard Preparation Procedure, and have been sent to the subcontractor for clarification/response.
1/30/2018	WRPS- PER- 2018- 0235	Assessment NIOSH review personnel located next to farms	The NIOSH review from November 28, 2016, recommends as part of WRPS' exposure controls, that it develop and implement administrative controls that might minimize the incidence of ancillary personnel being located near the tank farms, unless deemed necessary. The purpose of this PER is to initiate the evaluation of applicable procedures and processes for relocating personnel and siting facilities.
1/30/2018	WRPS- PER- 2018- 0236	2025EA ice machine	Since April 2015 the 2025EA building ice machine has no visible evidence of being cleaned (i.e. Preventive Maintenance) I have made repeated attempts to have this done to no avail. Multiple avenues have been exhausted and still no evidence the ice machine has been maintained.

1/30/2018	WRPS- PER- 2018- 0238	ETF Evaporator system noise	Abnormal noise is manifesting at the inlet / Outlet Silencers when the Evaporator System is taken from RUN to HOT STBY.
1/30/2018	WRPS- PER- 2018- 0239	ETF powder in drum from TFD	Effluent Treatment Facility completed filling a powder drum #98812 on 1/29/2018 in the Thin Film Dryer Room. It was noted that the powder was very dark in color while the norm is a white or cream color. This PER is generated as the dark colored powder is not normal and maybe an indication of a process change.
1/30/2018	WRPS- PER- 2018- 0240	RPE Issuing Station Identification Form	In procedure T0-020-028 WRPS has identified 8 operating RPE Issuing Stations. However currently none of these 8 RPE issuing station have valid Issuance Station Identification Form (A-60069-204) as required per DOE-0352.  "13.3 Issuance Station Issuance stations shall be designated by management (using the Respiratory Protection Equipment (RPE) Issuance Station Identification Form"

1/30/2018	WRPS- PER- 2018- 0242	AW101-WST LIT-106 maintenanc e	AW101-WST-LIT-106 was reported as not reporting to TMACS and had a failure code for the field reading. There is no indication of a level reading.
1/30/2018	WRPS- PER- 2018- 0243	Outdated PPE Procedure	<p>While going through the process to obtain safety shoes I came across some outdated information in the PPE procedure (TFC-ESHQ-S_IS-C-02). Attachment A - PPE Selection Criteria and Guidance of the procedure states "Protective footwear can be obtained as directed in the Purchasing Card (P-Card) procedure, TFC-BSM-CP_CPR-C-01 and by completing and submitting Hanford site form A-6003-769. When I went to site forms I discovered that form A-6003-769 no longer exists. Furthermore, when I reviewed TFC-BSM-CP_CPR-C-01, section 4.9.2, it directs the requesting employee to prepare an electronic MR using TMSS.</p> <p>Therefore, this MOP documents that TFC-ESHQ-S_IS-C-02, Attachment A needs to be updated to reflect the revised process for obtaining safety shoes.</p>
1/30/2018	WRPS- PER- 2018- 0244	242-A Evap waste feed instability	<p>Evaporator waste feed instability, nearly out of control.</p> <p>Automatic response of the waste feed control valve is extremely unstable leading to wide swings in pot level and continual hunting. Instability can last hours. The waste feed control valve is part of a cascaded control loop that includes the main pot level control.</p> <p>Consequences of instability include difficulty for human operators to maintain control since timing is tricky. Product (slurry density) output suffers low quality. Unstable waste feed leads directly to unstable slurry density, so output is usually below target. There is excessive wear and tear of the main waste feed control valve as it continuously hunts for position, shortening service life. In total, this leads to operation at less than optimal setpoints, leading to longer time to process and less available volume in our storage tank farms.</p> <p>Attached graphs show instability of pot level and waste feed flow during a campaign in April 2016. Note that waste feed reaches a maximum plateau during the extreme cycling. Note also the cycling diminishes only gradually, then continues low level hunting. This indicates a control loop near the out of control condition. Instability has occurred during every recent campaign, especially when slurry out processing is initiated or interrupted for a line flush. If the system were to cross into an out of control condition, then the pot could be over filled or under filled, and the Evaporator could shut down due to automatic interlocks.</p> <p>It has been difficult for people to get interested in this problem because this is the way things have been for a long time, expertise to solve the problem has been lacking, and other priorities take precedence. Operators have had to deal with the instability using judicious timing of adjustments to the level setpoint or loop output. I think the risk of a process upset is high. The instability problem is easy to resolve with simple adjustments in the control software. The software adjustments needed are quite similar to changing a setpoint.</p> <p>The Process Condensate tank flow and level control loop is set up similar to the main pot. It also exhibits wide swings of instability during operation and should also be tuned up.</p>

1/30/2018	WRPS- PER- 2018- 0245	MOP/WSV Temp Mods Discrepancy	The list of Temp Mods in the Operations Daily Report was compared to the Temp Mod ECN report from SPF. The Daily Report listed 3 Temp Mods and the SPF report listed 5 Temp Mods. Only one of those was on both lists. In other words, the Operations Daily Report shows 2 Temp Mods that are not on the SPF report and the SPF report shows 4 Temp Mods that are not on the Daily Report.
1/30/2018	WRPS- PER- 2018- 0246	filters have possibly been compromise d due to a lengthy weather exposure	8 Flanders HEPA Filters located stored outside on a pallet in the laydown yard near 2101HV. These filters have possibly been compromised due to a lengthy weather exposure. Additional testing will be needed to determine if these filters can be used. Filter Part Number T-007-W-43-05-NU-51-23-GG-FUS has what could be mold on the outside of the boxes and were not opened beyond what could be observed through areas the weather had opened in the top of the boxes.  These filters are Safety Class General Service and Quality Level 1. They should be storage level rated for indoor, climate regulated environments, not for outside storage.
1/31/2018	WRPS- PER- 2018- 0247	ETF Ice Machine LOTO	Work had been initiated on ice machine located in 2025E lunchroom . Unit had been unplugged and service panels removed. The ice machine was left unguarded with service panels removed, unit remained unplugged.

1/31/2018	WRPS- PER- 2018- 0248	Rad Sign replacement	On north side of B-farm there is an area labeled URMA and RA/CA with faded signs that could use replacing. See photo 88.
1/31/2018	WRPS- PER- 2018- 0249	Remove expired CACNs from each individual's SWCA or indicate in the SWCA that the CACN has been cancelled.	In the CLTR system, approved charge codes (CACNs) are listed in the individual's SWCA. If a CACN is cancelled, this information does not appear in the SWCA, nor is the previously authorized individual informed in any way of the cancellation. If the individual charges time to the cancelled CACN (e.g. for close out of a work package where the CACN has been cancelled before close out work has been completed), an error message immediately appears in TFCLTR, and an error message is sent to the individual and their BTR. This creates an error inevitable situation.
1/31/2018	WRPS- PER- 2018- 0220	NOV ESH&Q did potential to-emit calc	Ecology and Department of Health issue notice of violation (NOV) The Department of Ecology and the Department of Health issued a notice of violation (NOV) Docket #15420 claiming violations of the provisions in 40CFR61.07(c), 40CFR61.94, WAC 246-247-030(16), WAC 246-247-030(21), WAC 246-247-110(13), WAC 246-247-110(6), WAC 173-401-615(3)(a). The NOV was communicated in letter 18-NWP-017, dated January 24, 2018. The State notes that after discovery of radiological contamination within the annulus of AY-101, DOE did not revise potential-to-emit calculations for the associated emissions stack (296-A-18), and as a result did not properly designate the potential to emit for the stack. As a result, the State did not have the information it needed to establish appropriate abatement control technology and sampling frequency when issuing the associated radiological air emissions license.

1/31/2018	WRPS- PER- 2018- 0250	Timely triggering of Task on demand (TOD) PM activities	<p>I conducted a reactive MOP upon learning that task-on-demand (TOD) PMs were not performed when they should have been for 222-S Building air compressors CA-CMP-2A and CA-CMP-2B.</p> <p>PMs are supposed to be performed on the air compressors based on cumulative hours of operation. Hours of operation are tracked in two ways. One is by PM (see, for example, WO No. 375650) that provides for recording hours on a weekly basis. The other way is the daily recording of hours on the surveillance data sheet in ATS-LO-040-121, 222-S Laboratory Perform 222-S Surveillance and Inspections. Neither way of tracking hours of operation was sufficient to ensure that the two compressors underwent PMs when required (1000 hours of operation).</p> <p>Both ways of tracking operating hours record an ongoing cumulative value, but neither provides a way to track hours of operation since the last PM evolution. While time must be allotted for Planning to develop TOD work orders and obtain parts, and for Operations to provide LOTO documentation, neither way of tracking hours provides for "triggering" the actions soon enough to enable performance of the PMs prior to reaching 1000 hours of operation.</p> <p>It is unclear why two different means of tracking hours of operation are being used. This may represent unnecessary duplication of effort.</p>
1/31/2018	WRPS- PER- 2018- 0251	Portable ladder inspection	<p>Building 2703E (secured by lock)</p> <p>A portable ladder had not been inspected by a competent person in the last 12 months.</p>
1/31/2018	WRPS- PER- 2018- 0252	Bidg2703E A portable ladder had not been inspected by a competent person in the last 12 months	<p>Building 2703E (secured by lock)</p> <p>A portable ladder had not been inspected by a competent person in the last 12 months.</p>

1/31/2018	WRPS- PER- 2018- 0253	2703E tem hole covers not labeled "Danger-- Hole"	Building 2703E (secured and locked) The mezzanine has three hole covers. One is compliant, but two are not. The two temporary hole covers are not labeled with "Danger- Hole", They shall be secured and verified to withstand two times the intended load. Temporary hole covers are intended to be used for less than 180 days.
1/31/2018	WRPS- PER- 2018- 0254	Vehicle Accident- backed into lightpole 2704HV	At 1555 I received a phone call informing me that an employee had backed into a light pole in the east parking lot of 2704HV. At the time of the event I was with fellow supervisors. One of them made a phone call to safety, one made a phone call to HR and I made a phone call to the Central Shift Office. we went out to the accident site to inspect the damage and talk to the employees who were involved in the accident. First thing we asked them was if any of them were injured. They all said no and that they were fine. I asked the driver how this happened and he said that he was backing out of the spot he was parked in and while he was backing out decided that it might be faster to go a different direction then originally intended. He kept backing the vehicle further away in reverse to go the direction he wanted and that is when he backed into a light pole that he and his passengers, did not see. Initial contact to the vehicle was made on the back left bumper and also severely damaged the side panel above the back left tire. There was no severe damage to the light pole, just a couple scratches from contact with the truck. All employees verified that they conducted their 360 walk around the vehicle prior to use. Some causal factors that I can think of would be too much time in reverse, driver inattention, and a hurry at the end of the work day.
1/31/2018	WRPS- PER- 2018- 0255	ETF 2025ED ETF-59A-001 in the step 5.2.6--better define "secure"	During receipt and pumping of Modutank Tanker at 2025ED it was noticed that the upper manway hatch was not completely secured. It only had one latch tightened. Per ETF-59A-001 in the step 5.2.6 it says: (NCO) INSPECT outside of tanker for the following: Leaks Damaged equipment Missing equipment Wheels chocked Engine off Manway secure.  If the manway hatch is not secured it could leak in route to ETF and onto the sides of the tanker.

1/31/2018	WRPS- PER- 2018- 0256	Vehicle Accident- ecoblock struck in C Farm	An employee was assigned to (b)(6) at C Farm. At approximately 1400 the crane and flatbed on this job were exiting the farm. The employee was responsible for (b)(6). 1430 the flatbed had left the farm and the crane was exiting. The employee and another (b)(6) were monitoring the gate from the parking area across from the gate. A vehicle pulled in between the employee's truck and the gate blocking the view of the crane. The employee backed out of the parking space and moved forward a couple of feet to be able to see. They continued to monitor the gate until the crane exited. Once the crane was clear the second (b)(6) left the truck to close the gate. The employee pulled forward to pick him up and after ~ 1 foot the vehicle struck a concrete eco block that he had been parked next to. The eco block was not visible through the windshield due to the height of the trucks hood. The employee had never exited the vehicle during this evolution. No injuries occurred.
1/31/2018	WRPS- PER- 2018- 0258	Steam Line Insulation Deterioratin g	During a routine surveillance it was observed that the insulation from the inactive steam lines surrounding 291AD are deteriorating and shedding on the ground. The insulation that cover the inactive steam lines have a history of containing asbestos so actions may be required to protect workers in that area.  The steam lines and deteriorating insulation are within a WRPS controlled/fenced off contamination area (CA) that encircles WRPS assigned WIDS site 241-A-302A.
1/31/2018	WRPS- PER- 2018- 0259	Training on ORRSR (blue card) not being given	Assessment. FY2018-OPS-R-0103 observed that Field work supervisors and Operators that use Onsite Routine Radioactive Shipment Record (ORRSR) (also know as Blue Cards) are not receiving any training on their limitations and use. Other users such as HPT's and IHT's receive training prior to use.

1/31/2018	WRPS- PER- 2018- 0092	SMP for Rad Control Air Sample	<p>Radiological Control Air Sample Safety Software</p> <p>The Software Management Plan (SMP) for the Radiological Control Air Sample application was reviewed as part of the surveillance. The Radiological Control Air Sample application did not correctly implement the software work activities as specified in the governing procedure TFC-ENG-DESIGN-C-32, Utility Calculation Software Management.</p> <p>Finding 01: Contrary to TFC-ENG-DESIGN-C-32, Utility Calculation Software Management the software lifecycle documentation for the Radiological Control Air Sample HIS# 2245 contains multiple sections that did not adequately implement the Software Management Plan for the following areas.</p> <ul style="list-style-type: none"> <li>- Software Management Planning, Training and, Qualifications</li> <li>- Software Requirements Identification</li> <li>- Software Design and Implementation</li> <li>- Testing Phase and Acceptance Testing</li> <li>- Problem Reporting and Corrective Actions</li> </ul> <p>The following issues were identified in the implementation of the application to the TFC-ENG-DESIGN-C-32 procedure:</p> <p>A. Software Management Planning</p> <ol style="list-style-type: none"> <li>1. TFC-ENG-DESIGN-C-32 Template, Section 1.2 Scope says, Provide a general description of the software to be developed. The Scope section in the SMP is missing the specific scope information.</li> <li>2. TFC-ENG-DESIGN-C-32 Template, Section 1.5 Project Organization says, SP&amp;M Organization. The software owner followed the template as directed, however the software owner should correct the SMP to include their [Group Name].</li> <li>3. SMP, Section 1.7 Roles and Responsibilities, the Design Authority is missing from Table 1 Roles and Responsibilities. There is a PER: WRPS-PER-2017-2376 being worked by the Owner of the TFC-ENG-DESIGN-C-32 template to resolve the differences between the template and the procedure.</li> <li>4. Section 1.8 Software Tools, does not include Excel as a tool used to design the application.</li> <li>5. Section 1.9 Applicable SQA Work Activities and Deliverables, was not followed per the procedure for Safety Software as specified in Attachment A, Software Quality Assurance Tables: Table A-2. SMP SWA Deliverables Stage 1 Review Checklist.</li> <li>5a. Section 2.11 Acquisition says, This section is not applicable per TFC-ENG-DESIGN-C-32. Table A-2 of the procedure says, Full. Recommend the Software Owner include the following in the SMP: There is no acquisition applicable to the Radiological Control Air Sample Application. The application was created using the site approved Excel application.</li> <li>5b. Section 2.18 User Documents says, None. Table A-2 of the procedure says, Full. TFC-ENG-DESIGN-C-32, Section 4.2.3 Design and Implementation Phase, Step 5: Include a Documentation section or worksheet inside the application file. The worksheet was not included in the spreadsheet and could provide any specific user documentation in regards to the application. Recommend the Software Owner include the following in the SMP: No additional documentation beyond this software management plan exists. However, guidance on the execution of the spreadsheet is included in the documentation worksheet of the spreadsheet file.</li> <li>6. The Software Owner failed to implement the Design Authority (DA) roles/responsibilities for HIS# 2245 in Section 1.10.1 Reviews. The Design Authority was not assigned or perform the required reviews as specified in TFC-ENG-DESIGN-C-32. In addition, the following reviews/approvals were not obtained: <ol style="list-style-type: none"> <li>6a. TFC-ENG-DESIGN-C-32, Section 4.1 Software Life Cycle for New Utility Calculation Software Registrations, Step 3c: Assign at a minimum, the following reviewers /approvers. The Design Authority, Software Owner, and Quality Assurance roles were not assigned in SmartPlant (SPF).</li> <li>6b. TFC-ENG-DESIGN-C-32, Section 4.2.3.1 Software Design Verification, Step 2: Design Authority for Safety Software, involve the DA in the disposition of any comments from the ITR.</li> </ol> </li> </ol>
1/31/2018	WRPS- PER- 2018- 0260	Comply with MSC-PLN- WP-41080, establish I&M Committee for DOE- 0343, revise procedure	<p>MSC-PLN-WP-41080 "Hanford Integrated Standards Management Plan establishes requirements for development, implementation and maintenance of site wide procedures, including requirements establishing that "All standards will have chartered I&amp;M Committees;" and "Once a standard is implemented, the I&amp;M Committee shall meet, at a minimum, twice a year to conduct maintenance, review consistency, perform annual evaluation regarding the currency and implementation status of the document and as necessary, initiate and finalize a revision to the standard document." Further, responsibilities are assigned to the committee chair to "Adhere to the Charter..." and "Ensure that meeting summaries are taken and comments are documented" Unlike other site wide procedures such as DOE-0352, the Stop Work Procedure (DOE-0343) does not appear to have a charter, nor is there evidence on the standards in implementation and maintenance website (<a href="http://msc.ms.fh.gov/ims/page.cfm/IntegratedSiteWideSafetySystems(ISWSS)">http://msc.ms.fh.gov/ims/page.cfm/IntegratedSiteWideSafetySystems(ISWSS)</a>) demonstrating I&amp;M Committee meetings held at minimum twice a year. No minutes are available, nor are there apparent mechanisms to facilitate periodic review and update of the procedure, nor to identify necessary issues and engage the I&amp;M Committee to resolve. DOE-0343 includes content "This procedure extends the authority to stop work to situations where an employee believes there is a need to clarify work instructions; or to propose additional controls." This has been interpreted by some to mean that even issues/procedures with no immediate negative safety consequence should result, in some cases Contractor or Hanford wide, stop all work activities.</p> <p>Procedure DOE-0343 has had no documented review or update since November 21, 2013 and is in need of review/update.</p>
1/31/2018	WRPS- PER- 2018- 0261	AW Annulus Exhauster (296-A-28) experienced an unplanned shutdown.	<p>AW Annulus Exhauster (296-A-28) experienced an unplanned shutdown.</p>

1/31/2018	WRPS- PER- 2018- 0262	Portable exhauster POR-126 experienced an unplanned shutdown	Portable exhauster 296-P-49 (POR-126) experienced an unplanned shutdown on 1/24/2018 at 2246 due to high vacuum alarm.
1/31/2018	WRPS- PER- 2018- 0264	AZ-102 Leak Detection Pit Level is 28.0" which is above its maximum authorized limit	AZ-102 Leak Detection Pit Level is 28.0" which is above its maximum authorized limit of 23" per OSD-T-151-00007.
1/31/2018	WRPS- PER- 2018- 0265	Revise TFC- PRJ-PM-C- 02, section 4.1, step 7	<p>TFC-PRJ-PM-C-02, Project Management, section 4.1 Project Initiation, step 7, has a project manager "Contact the manager or an SME from the following organizations to discuss project scope, and determine whether the organization will be represented on the IPT." Of the 29 organizations listed, P&amp;CSE is not specifically called out, however, both "Project Engineering" and "Systems Engineering" are listed.</p> <p>From TFC-PLN-03 Engineering Program Management Plan, there are not specific groups by these titles, but section 6 does describe accountabilities for "Plant &amp; System Engineering" and "Tank Farm Projects". Further, "Plant &amp; System Engineering" is broken into accountabilities for Production Operations Engineering, SST Retrieval Engineering, Process and Control Systems Engineering, Process Engineering Analysis, and TOC System Engineering Program (which covers the Cognizant System Engineering).</p> <p>Inclusion of appropriate engineering, including I&amp;C as necessary, on the IPT is key to overcoming this issue at Project Initiation stage. WRPS-MOP-2018-0173 recommends that a clarification is made to align Project Management procedure with Engineering Program Management Plan to better ensure that all parties (engineering disciplines) are consulted in setting up IPT for new projects.</p>

1/31/2018	WRPS- PER- 2018- 0266	TEDF Pump Station 2	A small leak was found at TEDF Pump Station 2, Building 225E. The leak was coming from a check valve, but only occurs when the transfer pumps are running and the system is pressurized. The pumps come on and turn off automatically based on liquid levels so the exact time of occurrence was not logged. 6 – 10 ounces were estimated to have accumulated on the concrete floor within the building.
1/31/2018	WRPS- PER- 2018- 0263	241-AY-101 Annulus Leak Detector exceeded 90 day inoperability	241-AY-101 Annulus Leak Detector AY101-WSTA-LDT-151 exceeded the ninety day period of inoperability on 1/26/2018 due to Ultrasonic Testing.
2/1/2018	WRPS- PER- 2018- 0267	Caution Tags installed without installed by signature at ETF	Installed Caution Tags to control operation of the leachate pump hand switch at LERF Basins were installed without installed by signature.

2/1/2018	WRPS-PER-2018-0241	Reviewed HISI entries against MSA procedure definitions for major/minor	TF-18-QSR-024, Observation: The Software Management procedure, TFC-BSM-IRM_H5-C-01 does not provide guidance on the terms "Major" and "Minor" in the management of software updates. Only an abbreviated drop down field is offered in HISI to describe the Version Type field. HISI entries submitted for PRRB approval appear to be accepted without applying the definitions of major or minor, as published in the PRRB procedure. The resulting use of the Version Type field in HISI does not appear to meet the intended use indicated by the PRRB procedure. As a result, WRPS software owners appear to be consistently misstating the Version Type (Minor vs. Major) in their HISI submittals.
2/1/2018	WRPS-PER-2018-0268	washout on the berm for the Cross site transfer line	while performing routines in the area discovered a washout on the berm for the Cross site transfer line 600-269-PL. The washout is S.E. of the 241-CX-40 building. no elevation in background was detected.
2/1/2018	WRPS-PER-2018-0269	(b)(6) Failed to Remove Wetted Personnel From a CA	<p><b>PER TITLE:</b> (b)(6) Failed to Remove Wetted Personnel From a CA</p> <p><b>Performed Oversight of AX-102 Pump Disposal</b></p> <p><b>Summary:</b>  The crane was moved northwest of RMA-012, per FWS direction, to give the crane better access to the equipment in the RMA. The crane operator directed workers to stack outrigger pads as appropriate to ensure crane stability. Workers entered RMA-012 and collapsed the glove bag onto the shield box, (b)(6) of the weather enclosure, and then the enclosure was lifted from the CA and placed to the north of RMA-012. The FR clarified with (b)(6) that (b)(6) enclosure that contacted the ground were obtained. The crew then took a lunch break.</p> <p>Following lunch, the crane operator moved a 5'x5'x9' waste box into the work area of RMA-012 and removed the box lid. The collapsed glove bag and shield box were lifted and placed into the waste box. Workers then placed empty pallets into the waste box to ensure that the grout would surround the waste within the box. The segmented pump was lifted from its weatherproof bag and placed into the waste box. The lid was then installed, and the box was lifted out of the CA and placed north of RMA-012. The FR noted that two (b)(6) on the underside of the waste box when it was lifted. (b)(6) of the waste box and then placed a mixed waste label on the box. The FWS noticed that the box had a dose rate of about 3 mrem/hr at 30 cm, and requested that an RA be posted around the box. Following (b)(6), the waste box was moved to an RMA east of RMA-012.</p> <p>A low-level waste box was moved into the work area, and the lid was removed. Miscellaneous items were placed into the low-level waste box, including waste bags, pieces of wood, and tarps; all of the items were wetted, and many of the items had standing liquid on them. The FR noted that many of the items were being tossed into the low-level waste box from a distance; however, this behavior appeared to be corrected on the spot by a worker within the CA (Issue # 16303). The FR noted when (b)(6) were placing items into the low-level waste box, liquid fell onto (b)(6) and potentially soaked through their PCs. The FR questioned (b)(6) about the wetted PCs, and (b)(6) directed the affected (b)(6) to exit the work area, doff their PCs, and (b)(6) (no contamination was found). The FR performed a follow-up with RadCon management and determined that the definition of "soak through" varies (b)(6), and that for this job, (b)(6) did not believe that there was any soak through. The FR believes that if an individual in a CA is clearly wetted, that there should not be a detailed assessment of whether there is soak through, but rather that prompt action is taken to remove the individual from the CA and perform personnel contamination surveys (Issue # 16301 &amp; 16302).</p> <p>Several concrete blocks were picked by the crane within the CA of RMA-012 and placed north of the RMA. In each instance, (b)(6) (b)(6) on the underside of the block. There was one instance where the block was taken out of the CA and was suspended north of RMA-012 in a non-posted area; however, (b)(6) recognized this and requested that the concrete block be suspended over the CA so that (b)(6) could be obtained. The FR noted that the smears had the potential to be wetted and could result in shielding alphas and low-energy betas. Upon further review and discussions with RadCon management, the FR concluded that (b)(6) were not wetted, and that RWP AX-046 was adequate since it only required alpha surveys if beta/gamma is detected (Issue # 16304).</p> <p>Several equipment stands, and the PacTech weatherproof bag that enclosed the segmented pump, were either smeared or direct frisked and then dragged across the ground of the CA to workers who were in a non-posted area loading the stands onto the pickup truck. (b)(6) (b)(6) (b)(6) workers who were loading equipment. The FR confirmed with (b)(6) that the CA ground was frisked to verify no contamination prior to pushing the weatherproof bag across the ground to the non-posted area. (b)(6) stated that (b)(6) in the non-posted area was controlling the area as an RSA.</p>

2/1/2018	WRPS-PER-2018-0270	Caution Tags on leachate pump controllers to prevent running in AUTO	<p>WRPS-PER-2017-2883 was initiated on 12/11/17 to document the following problem:</p> <p>"35408-F12 ETF has not installed out of service tags (or equivalent tags to caution tags) at the leachate pump controllers to indicate the automatic function is not to be used. (Priority Level 3)(Swarens 12/8/2017)."</p> <p>A corrective action was generated to install Caution Tags on leachate pump controllers to prevent running in AUTO (WRPS-PER-2017-2883.1). On 1/29/18 the corrective action was completed upon notification from the SOM to the Operations Manager that tags were installed. Subsequent field walkdown performed by the DOE-ORP Facility Representative revealed the tags were not installed. The corrective action was re-opened to track installation of the Caution Tags. This PER is being written to document the miss-communication which led to improperly closing the corrective action.</p>
2/1/2018	WRPS-PER-2018-0272	WRPS Failed to Establish Procedural Guidance for Handling of Wetted Personnel	<p>PER TITLE: WRPS Failed to Establish Procedural Guidance for Handling of Wetted Personnel</p> <p>Performed Oversight of AX-102 Pump Disposal</p> <p>Summary:</p> <p>The crane was moved northwest of RMA-012, per FWS direction, to give the crane better access to the equipment in the RMA. The crane operator directed workers to stack outrigger pads as appropriate to ensure crane stability. Workers entered RMA-012 and collapsed the glove bag onto the shield box. (b)(6) of the weather enclosure, and then the enclosure was lifted from the CA and placed to the north of RMA-012. The FR clarified with (b)(6) that (b)(6) of the enclosure that contacted the ground were obtained. The crew then took a lunch break.</p> <p>Following lunch, the crane operator moved a 5'x5'x9' waste box into the work area of RMA-012 and removed the box lid. The collapsed glove bag and shield box were lifted and placed into the waste box. Workers then placed empty pallets into the waste box to ensure that the grout would surround the waste within the box. The segmented pump was lifted from its weatherproof bag and placed into the waste box. The lid was then installed, and the box was lifted out of the CA and placed north of RMA-012. The FR noted that two (b)(6) on the underside of the waste box when it was lifted. (b)(6) of the waste box and then placed a mixed waste label on the box. The FWS noticed that the box had a dose rate of about 3 mrem/hr at 30 cm, and requested that an RA be posted around the box. Following (b)(6), the waste box was moved to an RMA east of RMA-012.</p> <p>A low-level waste box was moved into the work area, and the lid was removed. Miscellaneous items were placed into the low-level waste box, including waste bags, pieces of wood, and tarps; all of the items were wetted, and many of the items had standing liquid on them. The FR noted that many of the items were being tossed into the low-level waste box from a distance; however, this behavior appeared to be corrected on the spot by a worker within the CA (Issue # 16303). The FR noted when two workers were placing items into the low-level waste box, liquid fell onto the workers and potentially soaked through their PCs. The FR questioned (b)(6) about the wetted PCs, and (b)(6) directed the affected workers to exit the work area, doff their PCs, (b)(6) (no contamination was found). The FR performed a follow-up with RadCon management and determined that the definition of "soak through" varies (b)(6) and that for this job, (b)(6) did not believe that there was any soak through. The FR believes that if an individual in a CA is clearly wetted, that there should not be a detailed assessment of whether there is soak through, but rather that prompt action is taken to remove the individual from the CA and perform personnel contamination surveys (Issue # 16301 &amp; 16302).</p> <p>Several concrete blocks were picked by the crane within the CA of RMA-012 and placed north of the RMA. In each instance, (b)(6) (b)(6) on the underside of the block. There was one instance where the block was taken out of the CA and was suspended north of RMA-012 in a non-posted area; however, (b)(6) recognized this and requested that the concrete block be suspended over the CA so that (b)(6) could be obtained. The FR noted that (b)(6) had the potential to be wetted and could result in shielding alphas and low-energy betas. Upon further review and discussions with RadCon management, the FR concluded that (b)(6) were not wetted, and that RWP AX-046 was adequate since it only required alpha surveys if beta/gamma is detected (Issue # 16304).</p> <p>Several equipment stands, and the PacTech weatherproof bag that enclosed the segmented pump, were either smeared or direct frisked and then dragged across the ground of the CA to workers who were in a non-posted area loading the stands onto the pickup truck. (b)(6) (b)(6) workers who were loading equipment. The FR confirmed with (b)(6) that the CA ground was frisked to verify no contamination prior to pushing the weatherproof bag across the ground to the non-posted area. (b)(6) stated that (b)(6) in the non-posted area was controlling the area as an RBA. (b)(6) who was in the non-posted area (b)(6) to verify that no contamination was spread from the CA to the non-posted area.</p>
2/1/2018	WRPS-PER-2018-0273	Workers Demonstrated Poor Radiological Work Practices	<p>PER TITLE: Workers Demonstrated Poor Radiological Work Practices</p> <p>Performed Oversight of AX-102 Pump Disposal</p> <p>Summary:</p> <p>The crane was moved northwest of RMA-012, per FWS direction, to give the crane better access to the equipment in the RMA. The crane operator directed workers to stack outrigger pads as appropriate to ensure crane stability. Workers entered RMA-012 and collapsed the glove bag onto the shield box. (b)(6) of the weather enclosure, and then the enclosure was lifted from the CA and placed to the north of RMA-012. The FR clarified with (b)(6) that (b)(6)s of the enclosure that contacted the ground were obtained. The crew then took a lunch break.</p> <p>Following lunch, the crane operator moved a 5'x5'x9' waste box into the work area of RMA-012 and removed the box lid. The collapsed glove bag and shield box were lifted and placed into the waste box. Workers then placed empty pallets into the waste box to ensure that the grout would surround the waste within the box. The segmented pump was lifted from its weatherproof bag and placed into the waste box. The lid was then installed, and the box was lifted out of the CA and placed north of RMA-012. The FR noted that two (b)(6) on the underside of the waste box when it was lifted. (b)(6) of the waste box and then placed a mixed waste label on the box. The FWS noticed that the box had a dose rate of about 3 mrem/hr at 30 cm, and requested that an RA be posted around the box. Following (b)(6), the waste box was moved to an RMA east of RMA-012.</p> <p>A low-level waste box was moved into the work area, and the lid was removed. Miscellaneous items were placed into the low-level waste box, including waste bags, pieces of wood, and tarps; all of the items were wetted, and many of the items had standing liquid on them. The FR noted that many of the items were being tossed into the low-level waste box from a distance; however, this behavior appeared to be corrected on the spot by a worker within the CA (Issue # 16303). The FR noted when two workers were placing items into the low-level waste box, liquid fell onto the workers and potentially soaked through their PCs. The FR questioned (b)(6) about the wetted PCs, and (b)(6) directed the affected workers to exit the work area, doff their PCs, (b)(6) (no contamination was found). The FR performed a follow-up with RadCon management and determined that the definition of "soak through" varies (b)(6) and that for this job, (b)(6) did not believe that there was any soak through. The FR believes that if an individual in a CA is clearly wetted, that there should not be a detailed assessment of whether there is soak through, but rather that prompt action is taken to remove the individual from the CA and perform personnel contamination surveys (Issue # 16301 &amp; 16302).</p> <p>Several concrete blocks were picked by the crane within the CA of RMA-012 and placed north of the RMA. In each instance, (b)(6) on the underside of the block. There was one instance where the block was taken out of the CA and was suspended north of RMA-012 in a non-posted area; however, (b)(6) recognized this and requested that the concrete block be suspended over the CA so that (b)(6) could be obtained. The FR noted that the smears had the potential to be wetted and could result in shielding alphas and low-energy betas. Upon further review and discussions with RadCon management, the FR concluded that (b)(6) were not wetted, and that RWP AX-046 was adequate since it only required alpha surveys if beta/gamma is detected (Issue # 16304).</p> <p>Several equipment stands, and the PacTech weatherproof bag that enclosed the segmented pump, were either smeared or direct frisked and then dragged across the ground of the CA to workers who were in a non-posted area loading the stands onto the pickup truck. (b)(6) (b)(6) workers who were loading equipment. The FR confirmed with (b)(6) that the CA ground was frisked to verify no contamination prior to pushing the weatherproof bag across the ground to the non-posted area. (b)(6) stated that (b)(6) in the non-posted area was controlling the area as an RBA. (b)(6) who was in the non-posted area (b)(6) to verify that no contamination was spread from the CA to the non-posted area.</p>

2/1/2018	WRPS- PER- 2018- 0274	WRPS Failed to Establish Procedural Guidance for Handling of Wetted Smears	<p><b>PER TITLE: WRPS Failed to Establish Procedural Guidance for Handling of Wetted Smears</b></p> <p><b>Performed Oversight of AX-102 Pump Disposal</b></p> <p><b>Summary:</b> The crane was moved northwest of RMA-012, per FWS direction, to give the crane better access to the equipment in the RMA. The crane operator directed workers to stack outrigger pads as appropriate to ensure crane stability. Workers entered RMA-012 and collapsed the glove bag onto the shield box. (b)(6) of the weather enclosure, and then the enclosure was lifted from the CA and placed to the north of RMA-012. The FR clarified with (b)(6) that (b)(6) that contacted the ground were obtained. The crew then took a lunch break.</p> <p>Following lunch, the crane operator moved a 5'x5'x9' waste box into the work area of RMA-012 and removed the box lid. The collapsed glove bag and shield box were lifted and placed into the waste box. Workers then placed empty pallets into the waste box to ensure that the grout would surround the waste within the box. The segmented pump was lifted from its weatherproof bag and placed into the waste box. The lid was then installed, and the box was lifted out of the CA and placed north of RMA-012. The FR noted that two (b)(6) (b)(6) on the underside of the waste box when it was lifted. (b)(6) of the waste box and then placed a mixed waste label on the box. The FWS noticed that the box had a dose rate of about 3 mrem/hr at 30 cm, and requested that an RA be posted around the box. Following (b)(6), the waste box was moved to an RMA east of RMA-012.</p> <p>A low-level waste box was moved into the work area, and the lid was removed. Miscellaneous items were placed into the low-level waste box, including waste bags, pieces of wood, and tarps; all of the items were wetted, and many of the items had standing liquid on them. The FR noted that many of the items were being tossed into the low-level waste box from a distance; however, this behavior appeared to be corrected on the spot by a worker within the CA (Issue # 16303). The FR noted when two workers were placing items into the low-level waste box, liquid fell onto the workers and potentially soaked through their PCs. The FR questioned (b)(6) about the wetted PCs, and (b)(6) directed the affected workers to exit the work area, doff their PCs, and (b)(6) (no contamination was found). The FR performed a follow-up with RadCon management and determined that the definition of "soak through" varies (b)(6) and that for this job, (b)(6) did not believe that there was any soak through. The FR believes that if an individual in a CA is clearly wetted, that there should not be a detailed assessment of whether there is soak through, but rather that prompt action is taken to remove the individual from the CA and perform personnel contamination surveys (Issue # 16301 &amp; 16302).</p> <p>Several concrete blocks were picked by the crane within the CA of RMA-012 and placed north of the RMA. In each instance, (b)(6) (b)(6) on the underside of the block. There was one instance where the block was taken out of the CA and was suspended north of RMA-012 in a non-posted area; however, (b)(6) recognized this and requested that the concrete block be suspended over the CA so that (b)(6) could be obtained. The FR noted that (b)(6) had the potential to be wetted and could result in shielding alphas and low-energy betas. Upon further review and discussions with RadCon management, the FR concluded that (b)(6) were not wetted, and that RWP AX-046 was adequate since it only required alpha surveys if beta/gamma is detected (Issue # 16304).</p> <p>Several equipment stands, and the PacTech weatherproof bag that enclosed the segmented pump, were either smeared or direct frisked and then dragged across the ground of the CA to workers who were in a non-posted area loading the stands onto the pickup truck. (b)(6) workers who were loading equipment. The FR confirmed with (b)(6) that the CA ground was frisked to verify no contamination prior to pushing the weatherproof bag across the ground to the non-posted area. (b)(6) stated that (b)(6) in the non-posted area was controlling the area as an RBA. (b)(6) who was in the non-posted area (b)(6) to verify that no contamination was spread from the CA to the non-posted area.</p>
2/1/2018	WRPS- PER- 2018- 0275	T-Farm Tumbleweeds	<p>While performing a "Walk Your Space Down" MOP, it was noticed at "T-Farm" that Tumbleweeds are becoming an issue. Very large piles and accumulation outside the farm boundaries.</p>
2/1/2018	WRPS- PER- 2018- 0276	WRPS Failed to Establish Procedural Guidance for Additional PPE Requirements in a CA	<p><b>PER TITLE: WRPS Failed to Establish Procedural Guidance for Additional PPE Requirements in a CA</b></p> <p><b>Performed Oversight of AX-102 Pump Disposal</b></p> <p><b>Summary:</b> The crane was moved northwest of RMA-012, per FWS direction, to give the crane better access to the equipment in the RMA. The crane operator directed workers to stack outrigger pads as appropriate to ensure crane stability. Workers entered RMA-012 and collapsed the glove bag onto the shield box. (b)(6) of the weather enclosure, and then the enclosure was lifted from the CA and placed to the north of RMA-012. The FR clarified with (b)(6) that (b)(6) that contacted the ground were obtained. The crew then took a lunch break.</p> <p>Following lunch, the crane operator moved a 5'x5'x9' waste box into the work area of RMA-012 and removed the box lid. The collapsed glove bag and shield box were lifted and placed into the waste box. Workers then placed empty pallets into the waste box to ensure that the grout would surround the waste within the box. The segmented pump was lifted from its weatherproof bag and placed into the waste box. The lid was then installed, and the box was lifted out of the CA and placed north of RMA-012. The FR noted that two smears were taken on the underside of the waste box when it was lifted. (b)(6) of the waste box and then placed a mixed waste label on the box. The FWS noticed that the box had a dose rate of about 3 mrem/hr at 30 cm, and requested that an RA be posted around the box. Following (b)(6), the waste box was moved to an RMA east of RMA-012.</p> <p>A low-level waste box was moved into the work area, and the lid was removed. Miscellaneous items were placed into the low-level waste box, including waste bags, pieces of wood, and tarps; all of the items were wetted, and many of the items had standing liquid on them. The FR noted that many of the items were being tossed into the low-level waste box from a distance; however, this behavior appeared to be corrected on the spot by a worker within the CA (Issue # 16303). The FR noted when two workers were placing items into the low-level waste box, liquid fell onto the workers and potentially soaked through their PCs. The FR questioned (b)(6) about the wetted PCs, and (b)(6) directed the affected workers to exit the work area, doff their PCs, and (b)(6) (no contamination was found). The FR performed a follow-up with RadCon management and determined that the definition of "soak through" varies (b)(6) and that for this job, (b)(6) did not believe that there was any soak through. The FR believes that if an individual in a CA is clearly wetted, that there should not be a detailed assessment of whether there is soak through, but rather that prompt action is taken to remove the individual from the CA and perform personnel contamination surveys (Issue # 16301 &amp; 16302).</p> <p>Several concrete blocks were picked by the crane within the CA of RMA-012 and placed north of the RMA. In each instance, (b)(6) was taken on the underside of the block. There was one instance where the block was taken out of the CA and was suspended north of RMA-012 in a non-posted area; however, (b)(6) recognized this and requested that the concrete block be suspended over the CA so that (b)(6) could be obtained. The FR noted that (b)(6) had the potential to be wetted and could result in shielding alphas and low-energy betas. Upon further review and discussions with RadCon management, the FR concluded that (b)(6) were not wetted, and that RWP AX-046 was adequate since it only required alpha surveys if beta/gamma is detected (Issue # 16304).</p> <p>Several equipment stands, and the PacTech weatherproof bag that enclosed the segmented pump, were either smeared or direct frisked and then dragged across the ground of the CA to workers who were in a non-posted area loading the stands onto the pickup truck. (b)(6) (b)(6) workers who were loading equipment. The FR confirmed with (b)(6) that the CA ground was frisked to verify no contamination prior to pushing the weatherproof bag across the ground to the non-posted area. (b)(6) stated that (b)(6) in the non-posted area was controlling the area as an RBA. (b)(6) who was in the non-posted area (b)(6) to verify that no contamination was spread from the CA to the non-posted area.</p>

2/1/2018	WRPS- PER- 2018- 0277	2713WB (Green hut) Contaminati on	While survey 2713WB (Green hut) in 200 west as a courtesy for operation because of PFP events a roll of tape was found with 40,000DPM/100cm2 beta gamma (No alpha) Direct. smear of tape roll was <1,000DPM/100cm2 beta gamma (No alpha).
2/1/2018	WRPS- PER- 2018- 0278	Unable to re- start K1-5-2 in Auto.	Unable to re-start K1-5-2 in Auto.
2/1/2018	WRPS- PER- 2018- 0279	Gas Bottle Permit walk down revealed missing TVAT gas bottle permits at 222-5 11A	During the 2/1/18February Gas Bottle Permit walk down for the annual gas bottle permit review (see Lab procedure is ATS-910, SECTION 4.19) it was found that the 222-5 Gas Bottle Permit List did not include some of the TVAT gas bottles permits. All TVAT gas bottle permits that were found in 11A were reviewed and extended through 2/1/19 as part of the walk down. The 222-5 Gas Bottle Permit List will be updated to include all 11A TVAT gas bottle permits so some were overdue.

2/1/2018	WRPS- PER- 2018- 0280	The K1 stack monitor indicator light Hi/Lo Temp. is not working.	The K1 stack monitor indicator light Hi/Lo Temp. is not working.
2/1/2018	WRPS- PER- 2018- 0281	The heat trace (242A-V V-HT-002) for the Ammonia monitor is below range.	The heat trace (242A-V V-HT-002) for the Ammonia monitor is below range.
2/1/2018	WRPS- PER- 2018- 0282	Procedure Change Table	<p>The procedures group sends out email notifications when new revisions of administrative procedures have been released. The beginning of the notification includes a red table with bold text reminding procedure owners to perform their periodic reviews. Unfortunately, this reminder is worded in such a way that many users don't realize the intent of the reminder. They interpret the email to mean they are required to review the procedures in the notification. At minimum this has led to many people in my group being confused if they have something they need to do or not. Several members of my group have wasted time reading the procedures in the email notification even though they don't apply to them.</p> <p>This notification is sent to hundreds of recipients, potentially leading to a significant number of people who are confused, or waste time reading procedures they don't need to.</p>

2/2/2018	WRPS- PER- 2018- 0283	Failed extension cord that resulted in exposed hazardous energy at AW Farm.	The CSO received notification from an FWS that three teamsters and an NCO stocking the AW bottle trailer notified him of a burnt electrical smell in the trailer with no observation of fire or smoke.
2/3/2018	WRPS- PER- 2018- 0284	ETF Thin Film Dryer Unplanned Shut Down	Thin Film Dryer shuts down for unknown reason due to interlock. Sump 2 level high and wont pump out automatically.
2/5/2018	WRPS- PER- 2018- 0285	Protech Showers	The Pro-Tec emergency showers were modified in October 2017 to remove the UV sanitization system and also install a drainable filter housing. It does not appear as though SmartPlant Foundation was updated to include these changes.

2/5/2018	WRPS-PER-2018-0286	ETF electrical maintenance cycle	This issue was identified about 9 months after Transition. The issue is the frequency of clean and inspects for electrical distribution equipment currently ETF is on a 7 and ten year cycle as to inside gear vs outside gear. Tank Farms is 1 and three (1 year for outside equipment and 3 year for inside), this has been understood by engineering for a while and efforts are underway to correct the PM's. the other issue that goes with it is the lack of a comprehensive PM program for all of our outside EDS equipment. It appears that many of our systems here may not have a PM associated with them for clean and inspects.
2/5/2018	WRPS-PER-2018-0237	222S Laboratory experienced partial loss of HVAC causing a strong vacuum as people were unable to exit doors.	on Thursday January 25th, 2018 at approximately 1004 hours the 222-S building experienced a partial loss of HVAC that resulted in the building developing a strong vacuum. Some of the 222-S exit doors became effectively suction locked. A single person or several smaller personnel were unable to open and exit through doors until assisted from the outside. The FOM recognized the issue and directed personnel to exit out door 16 that has an air lock and opened normally. The event did not require a building evacuation and no personnel were reported injured.
2/5/2018	WRPS-PER-2018-0287	PC-5000 leak detection monitoring	Both ETF and 242-A Evaporator have the same alternate leak detection monitoring requirement for the PC-5000 line. This requirement is listed in both RCRA permits. - Section 6.2.2.3 of the 242-A RCRA permit states, "Visual inspection for leaks from the PC-5000 transfer line are performed by 242-A Evaporator Operations, by looking for signs of any liquid not attributed to rain/precipitation at the encasement catch tank (TK-PC-101)" - Section C.1 of ETF's RCRA permit states, "in the event that these leak detectors are not in service, the pipelines are visually inspected during transfers for leakage by opening the secondary containment drain lines located at the 200 Area ETF end of the transfer pipelines." Note, the leak detectors are not in service and 242-A personnel perform the required function of opening the secondary containment drain lines at ETF.

2/5/2018	WRPS- PER- 2018- 0288	S-107 LOW cleanliness check	While performing "Cleanliness checks" on Liquid observation wells at S-107, 240,000 DPM/ "swab" beta gamma was detected <20 DPM/ Swab alpha.
2/5/2018	WRPS- PER- 2018- 0289	AY/AZ Stack Survey Data Discrepanc s	The lab communicated that there were some discrepancies in the lab data reported for both VOC's and SVOC's for first quarter AY/AZ Stack survey data. Specifically, one of the VOC sample duration times was only 20 minutes and there was no duplicate SVOC. In the SAP RPP-PLAN-60589 it calls out for a primary and duplicate VOC sample and both are to have a sample duration time of 80 minutes. In addition, there should be both a primary and duplicate SVOC sample. After cross referencing the SAP with the IH Sample Plan (IHSP-ENV-AYAZ-01 Rev. 1) and the IH Air Sampling Survey 17-00116 it was discovered that the IH Plan requires one of the two VOC samples to only have a 20 minute sample duration time and only requires one SVOC sample. Therefore, the samples followed the IH Sample Plan but the IH Sample Plan should not have deviated from the SAP.
2/6/2018	WRPS- PER- 2018- 0290	702AZ AOP- 015	Five (b)(6) were entering the 702-AZ exhauster building, Room 108 for (b)(6) They noticed an odor and exited the building. They notified FWS. ADM and CSM were notified. Entered AOP-015. None of the workers reported symptoms.

2/6/2018	WRPS- PER- 2018- 0291	Personal Time Bank and Other Absences	<p>TFC-BSM-HR-AT-C-03, REV D-0 Personal Time Bank and Other Absences, Attachment B, has confusing direction regarding covered absences due to death in the family for "in-law" family.</p> <p>This confusing language resulted in a bargaining unit employee understanding "D" time for the death of their sibling's spouse was covered prior to absence.</p> <p>During the "D" time absence, this employee was contacted on 1/30 to be informed that the time was not covered. Then, the employee was contacted again on 1/30 to be informed that they are covered.</p> <p>Then, after the employee returned from their time off on 2/5, they were informed that the time was in fact not covered.</p> <p>The result is that the employee was not given accurate information to make an informed decision on the use of their personal time bank.</p> <p>The determination on whether the time was covered or not was vetted through Human Resources to ensure that the determination was accurate and in accordance with procedure.</p> <p>This type of confusion is obviously unacceptable when considering it deals with a death in an employee's family.</p>
2/6/2018	WRPS- PER- 2018- 0292	278AW Hood Removal	<p>We are expected to clean 150+ SCBA racks on a swing shift which means we must utilize both cleaners (required to clean straps) at the same time. We are very limited in space and the only area we can accomplish this is on the counter next to the sink. We have asked numerous times for a hood that protrudes from the cabinets to be removed as we are constantly hitting our hands and head as we have to work directly below it. This is a safety hazard. This request has been going on for over a year.</p>
2/6/2018	WRPS- PER- 2018- 0296	SY Emergency Shower AOP- 015 Event	<p>While digging for the installation of a concrete pad for the SY Safety shower on the northwest corner of SY Farm exterior two FE&amp;C employees smelled a Pinesol/Lemony chemical smell.</p>

2/6/2018	WRPS- PER- 2018- 0297	employees using potentially incorrect concrete drilling methods	I received a call yesterday from (b)(6) regarding unsafe work occurring. (b)(6) workers were drilling into concrete blocks without wet methods, no respiratory protection being worn, and one worker was not wearing any eye protection. (b)(6) informed the workers that they needed to be utilizing wet methods, and/or respiratory protection, and they absolutely needed to be wearing appropriate eye protection. The workers dismissed what (b)(6) had said, and told (b)(6) that wet methods were not suitable for their work. It was my understanding the FWS in charge of the package was not available and present at this time. (b)(6) then called me, and the FWS.
2/6/2018	WRPS- PER- 2018- 0294	BY Farm FCA posts are weathered and rust is beginning to eat through the paint.	While performing a semi-annual routine surveillance for FCA's (W-13-055, W-13-056, W-13-057 & W-13-058), posts are weathered and rust is beginning to eat through the paint. The area is located East of BY-farm along the gravel road leading to the gate. No removable contamination was detected.
2/7/2018	WRPS- PER- 2018- 0298	PLN-47, page 24 error in Section 10.1 Requirements	PLN-47, page 24 error in Section 10.1 Requirements

2/7/2018	WRPS-PER-2018-0302	Workflow Review & Approval Process for Procedures (WRAP) electronic workflows	<p>This MOP examined Workflow Review &amp; Approval Process for Procedures (WRAP) electronic workflows to gauge the extent to which the Impacted Documents process for Tank Farm Administrative Procedures is being followed. According to TFC-BSM-AD-C-01, this process directs Procedures to "Perform a search for impacted documents and attach list to the workflow," and directs the Document Owner to "Answer questions in WRAP workflow, notify impacted organizations as directed, and then approve procedure.</p> <p>To obtain an indication of Impacted Documents process compliance &amp; effectiveness, this review focused on the "Admin New/Major/Minor Changes" workflow and its checklist "Doc Owner/TA Review Editorial," wherein the Impacted Documents process is addressed. Two "questions" in that checklist provide guidance to the Document Owner/Technical Authority (DO/TA) of the subject document change of the workflow:</p> <p>--- 3. "If other documents are impacted (by the workflow-routed document change), list them and provide the date the document owner was notified of the impact to the owner's document. If no documents are impacted, type N/A." (Hyperlink provided to the Procedures search tool.)</p> <p>--- 4. "If the change impacts controlled forms, have the form changes been processed in accordance with TFC-BSM-AD-C-02?"</p> <p>RESULTS SUMMARY: A total of 20 Administrative documents were examined whose WRAP workflows were initiated between 1/18/2018 and 2/5/18, inclusively, and those workflows' "Doc Owner/TA Review Editorial" checklists had been completed. (See attached list of workflowed documents examined.) According to answers to the above two questions, out of all 20 DO/TA respondents, 19 provided the answer N/A. The remaining respondent [the DO/TA for TFC-MD-136] inserted a list of 46 documents impacted by the MD change; no dates were provided for when the impacted documents' owners were notified of impacts.</p> <p>SECONDARY OBSERVATION: RECORDS QUALITY ISSUE --- While using WRAP Checklist "Doc Owner/TA Review Editorial" for the above analysis, it was noted that the checklist's Question numbers had been stripped away during WRAP's PDF-generation routine that automates creation of the workflow's Records file. It appears this may pose a Records quality issue because WRAP questions often cross-reference other questions by number. In the "Doc Owner/TA Review Editorial" checklist, for example, the user is directed to apply Question 8's content to Question 9; however, it may be difficult for a reviewer of the eventual Records file to be certain which question is #9 because of the aforesaid question-number omission flaw.</p>
2/7/2018	WRPS-PER-2018-0303	B Train of the AP primary exhauster (296-A-49) was inadvertently shutdown	<p>During calibration of pressure instrumentation in AP Farm, the B Train of the AP primary exhauster (296-A-49) was inadvertently shutdown.</p>
2/7/2018	WRPS-PER-2018-0307	The record sampler flow rate for the A Train of the AN Primary Exhauster found out-of-range	<p>The record sampler flow rate for the A Train of the AN Primary Exhauster (296-A-44) was found out-of-range (greater than normal flow rate) for more than 4 hours.</p>

2/7/2018	WRPS- PER- 2018- 0304	2704HV Paper Towel in Fire Suppression System Sprinklers	This morning I was walking down the north lower hallway by the restrooms at 2704 HV and notice something hanging down from the ceiling. Someone has taken some paper towel and rolled it up and shoved it into the fire sprinkler head. I got with management and we called fire systems and confirmed that this was not normal and should be removed. Later around 10:00 am had conversation with janitorial and they removed 3 other wads of paper towel from other locations in different parts of 2704HV. Placing paper towels in the sprinklers could affect the function of the system or set the system off.
2/7/2018	WRPS- PER- 2018- 0308	Rounds could not be performed in the 200 Area West Tank Farms U/TX/TY on January 25th and 28th of 2018	Because of the surface contamination exclusion zone implemented by the Plutonium Finishing Plant (PFP), project TOC operators rounds could not be performed in the 200 Area West Tank Farms U/TX/TY on January 25th and 28th of 2018. Plus due to changing conditions/recovery actions, it is anticipated that future TOC operator rounds may be impacted.
2/8/2018	WRPS- PER- 2018- 0310	Basin 44 change trailer power	There is no power for heat, air conditioning unit, or lights in the change trailer for the basin 44 change trailer. During the summer months there is no way for the employee to cool down while in a full set of PPE. This change trailer can get very hot causing a safety issue. This issue was placed in the EAPC Safety Book # ETF-17-08

2/8/2018	WRPS-PER-2018-0295	Spreader bar load testing	During a review of a recent AX grout box lift plan, it was questioned if enough spreader bar load testing detail is provided on the drawings.
2/8/2018	WRPS-PER-2018-0311	Security badge requirements procedures	The MSC-RD-SEC-28974, Security Badge Requirements, procedure points to TPD-0010, Hanford Site Access Training Program Description, to determine training requirements for visitors, vendors, etc.; both procedures must be adhered to when escorting or otherwise facilitating visitors. Per Section 4.4 of TPD-0010, "Where a safety escort is assigned to accompany a visitor, the escort shall ensure that the training requirements, as identified by the host, are met prior to the visitor being released to commence with their activities." Currently, TPD-0010 is not on the list of approved procedures for WRPS use, per the "Other Hanford Prime Contractor Documents and the WRPS Technical Points of Contact." This document should be included in the list of Other Hanford Prime Contractor Documents, and technical point of contact assigned.
2/8/2018	WRPS-PER-2018-0312	AY101-WSTA-LDT-153 failed calibration	Plummet for the level detector has debris under it that prevented a new R value from being established. A reading for the level detector was missed on 2/1/18.

2/8/2018	WRPS- PER- 2018- 0315	LMBC3-0163 calibration	Notified by MSA that Micro Rem meter LMBC3-0163 was found out of specification low upon return for recalibration.
2/8/2018	WRPS- PER- 2018- 0317	Potential leak in drain system in 222-S Tunnel	The 222S lab rooms have a drain system that runs through the floors into the tunnel sections that appears to be leaking through a crack that has been previously repaired in one section of concern. My pictures show moisture coming from a the crack in old repaired area of piping just before entering the trap. The FOM had Rad Con Survey with nothing detectable. I was informed their inspection and pictures did not show evidence of active leak and as I informed you I did not see any visible on the floor. I was also informed the sink in room 4C is already on restricted access for some reason. Historical knowledge identified a lot of material both chem and rad used to go down this system.
2/8/2018	WRPS- PER- 2018- 0299	Ecology inspection letter 18- NWP-022 (circuit boards)	Ecology inspection identified noncompliant management of dangerous waste (circuit boards).  On October 25, 2017, Ecology inspectors discovered an unlabeled plastic trash container holding used circuit boards and miscellaneous electronic components at Building 2703E (Maintenance Shop; on 4th just west of Baltimore). At Ecology's request, Waste Services prepared and transmitted a Waste Designation Worksheet for Printed Circuit Boards (excerpt attached). The worksheet identified toxicity characteristic waste codes D008 (Lead) and D009 (Mercury) as applicable, indicating that the circuit boards were a dangerous waste, making them subject to the requirements of WAC 173-303. Included in WAC 173-303 are requirements to (1) properly designate the waste, (2) label waste containers in a manner that adequately identifies the major risks, and (3) keep the containers closed when not adding or removing waste. In its letter, 18-NWP-022, Ecology states that WRPS' management of the subject circuit boards did not comply with these requirements. On pages 13 through 15 of its letter, Ecology lists the applicable requirements and discusses its two findings. Page 15 states that, based on the information subsequently provided by WRPS, no further action was required for either finding.

2/8/2018	WRPS- PER- 2018- 0300	Ecology inspection letter 18-NWP-022	Ecology identified an opportunity for improvement for the 2715AW dangerous waste inspection checklist  In its inspection letter 18-NWP-022 (page 16 of 29), Ecology notes that weekly inspection logs for the 2715AW 90-day accumulation area do not specifically call out inspecting for leaking containers. Ecology's stated concern is that "If a leak were to occur, a violation may result because it is unclear if containers are being inspected for leaks as required by WAC 173-303-630(6)." Ecology notes that "MSA and CHPRC, in their weekly inspection checklists, include criteria to specifically look for leaking containers."
2/8/2018	WRPS- PER- 2018- 0319	219-S small leak in the P-1 Pump during waste transfer of Tank 102 to SY-101	While performing a waste transfer from 219-S (Tank 102) to SY Farm (Tank SY-101), the P-1 Pump in 219-S Cell B, developed a small leak. The leak was observed by the camera operator and appeared to be coming from the P-1 pump area. The waste transfer was being performed with Production Operations in accordance with ATS-LO-100-177, 222-S Laboratory Transfer 219-S Tank 102 Liquid Waste to Tank Farms, Pipeline and TO-430-080, Transfer from 219-S Tank 102 to SY-101. The Waste Transfer was shutdown immediately by the Chem Techs performing the waste transfer @ 219-S Operating Gallery. Notifications were made to the Central Shift Manager and 222-S Facility Operations Manager.
2/8/2018	WRPS- PER- 2018- 0320	Wastewater received is quickly fouling filters at ETF while it is being offloaded	The ETF receives wastewater from via tankers from the CHPRC Groundwater Modutanks. The wastewater received is quickly fouling filters at ETF while it is being offloaded. The rate at which filters are fouling indicate that constituents are in the wastewater that are not being effectively removed by CHPRC filtration efforts prior to shipment to ETF.

2/9/2018	WRPS- PER- 2018- 0305	POR127 unplanned shutdown	Portable Exhauster POR127 (296-P-50) experienced an unplanned shutdown due to a CAM failure.
2/9/2018	WRPS- PER- 2018- 0324	ETF Leak found at TEDF Pump Station 1 (225W Bldg).	A small leak was found at TEDF Pump Station 1 (225W Bldg). Leak came from a pressure relief valve. Valve leaking at a rate of 1 drip every 10 minutes.
2/10/2018	WRPS- PER- 2018- 0327	ETF pipe support	4% CPVC Caustic line to CT tanks is contacting an adjacent PVC Raw Water line during chemical additions into either CT tank. I believe engineering needs to evaluate the piping configuration and determine if the amount of line movement during additions is satisfactory or if additional support / modifications are needed. This would be in addition to Maintenance providing adequate spacing between lines and support measures as needed.

2/11/2018	WRPS-PER-2018-0328	Replace Fire Extinguishers at ETF	During performance of the ETF Monthly Fire Extinguisher Inspections ( WO#377618 / ETF-85B-005 ) NCO identified (20) Fire Extinguishers that have HFD " Replace Hydrostatic Test Date Expired " Tags installed on them.
2/12/2018	WRPS-PER-2018-0329	A water intrusion into tank 241-SX-101 has been determined	<p>A water intrusion into tank 241-SX-101 has been determined. The estimated intrusion rate is small at about 25 gal/yr.</p> <p>An in-tank video was obtained in SST 241-SX-101 on December 14, 2017. During the video a slow drip rate was observed falling into a small pool around the saltwell screen in riser 9. It was evaluated to see if there was an intrusion or if this was condensation, and it was finally decided to be an intrusion. Environmental personnel were notified on January 16, 2018.</p>
2/12/2018	WRPS-PER-2018-0331	Automated E-logs logbook entries	<p>During logbook review I noted that LCO related tracking updates result in logbook entries being automatically landed into the CSM log as well as the respective area team log.</p> <p>My ADM also indicated that the temporary mod process similarly creates a log entry into the CSM log.</p> <p>This level of automation certainly improves the accuracy and timeliness of the related log entries that are created but I am concerned that we are no longer meeting the age-old ConOps requirements that the person on duty and responsible for the log must authorize others to make entries and, with hard copy logbooks, typically signed specific log entries made by others. The requirements in TFC-OPS-OPER-C-17 need to be reviewed to ensure related expectations are maintained due to these automated log entries.</p>

2/12/2018	WRPS- PER- 2018- 0332	White Substance Observed in AN-A and AN-B Valve Pits During DVI Inspections	During performance of Double Valve Isolation PM testing in 241-AN-B Valve Pit, what appeared to be concrete slurry was observed. It is believed to be from the in-pit heater core drilling of the coverblock in the pit. A large area had the material "sprayed" around. There was white material on the wall, floor, jumpers, valves, and PUREX connectors (See attached photos). The location of the slurry made it difficult for an experienced QA evaluator to perform the DVI valve in-service inspection; although he was able to complete the inspection. Two days later, 241-AN-A Valve Pit DVI testing was performed. This pit too had white substance on all the same locations listed for 241-AN-B Valve Pit.
2/12/2018	WRPS- PER- 2018- 0321	2225 Several fume hoods in the 222-5 Laboratory CA have cords / cables crossing the fume hood boundary unsecured.	Contrary to the requirements of ATS-LO-161-003, several fume hoods in the 222-5 Laboratory CA have cords / cables crossing the fume hood boundary unsecured to prevent migration of the items in/out of the fume hoods.
2/12/2018	WRPS- PER- 2018- 0322	2225 Status map room 1C not up to date latest survey along with 1GB map not at entrance .	The status map for room 1C was not up to date with the latest survey information (survey performed on 2/5/2018 and map last updated on 1/29/2018). The status map for room 1GB from corridor 8B was not at the entrance to the room.

2/12/2018	WRPS- PER- 2018- 0326	222s Excessive sample inventory leading to increased exposure to workers having search additional items. ALARA concern.	An excessive sample inventory is leading to increased exposure to workers due to having to search through additional items, that might be eligible for disposal, in order to locate work-listed samples. This has been brought forward as an ALARA concern.
2/12/2018	WRPS- PER- 2018- 0313	SST dome elevation survey frequency	There is not a stand alone document explaining the regulatory and programmatic requirements for determining the frequency of SST dome elevation surveys. This has lead to confusion with a statement in RPP-RPT-43116, Section 3.1.1.1 versus requirements in TFC-ENG-FACSUP-C-10, RPP-26516, and OST-T-151-00013. There is no violation of environmental requirements. This PER documents a document deficiency.
2/12/2018	WRPS- PER- 2018- 0316	(b)(6) driving government truck backed into parked vehicle.	<p>(b)(6) driving government truck backed into parked vehicle.</p> <p>The following description of the incident was provided by (b)(6) who was driving the vehicle which struck a parked vehicle:</p> <p>(Please refer to detailed drawing/picture for clarity. The drawing is as close as I can get to actual configuration at the time of the accident.) After performing (b)(6) coverage of construction in an RBA I returned (b)(6) to MO-523, using the parking designated for that at the north of the building. Upon returning to my vehicle I performed a 360-degree walk-around, noting the two vehicles parked along the berm, the closest one about 30-40 feet behind my truck. This area is familiar to all (b)(6), having a drain field on the right and the transfer berm on the left. There is a vehicle passage over the berm shortly behind where we park our vehicles for instruments. The area also often has vehicles parked against the berm as indicated on the drawing.</p> <p>Once inside the vehicle I checked to my left to ensure no vehicles were approaching for travel over the berm where their path and mine would intersect. I looked in the rear view mirror and the right side mirror, seeing no approaching vehicles or personnel. I began my back up in preparation for turning to move forward and drive over the berm. I always backup very slowly in trucks as visibility is poor directly behind. Somewhere around 5 -10 feet in my backup I was startled to see movement in the corner of my right eye. I quickly looked over and—as best as I can remember—placed my foot over the brake to begin stopping. (This point is noted on the map, as best as I can recall positioning.) But I quickly realized that there were two personnel on foot who were far enough away to the right to be out of any danger from my vehicle. I turned my head farther to ensure no other pedestrians were coming from farther behind, still startled that the two people had approached between when I had done my 360 and when I saw them, too far to the right to have been in the side mirror image but having approached between my glances behind, to the left and to the right. I was not aware of just how far I had travelled in reverse and, travelling at a very slow speed, did not realize my vehicle was close to the first truck parked at the berm.</p> <p>My first indication that I had travelled too far was a noise that had me braking to a complete stop. Securing the vehicle, I inspected the damage. My vehicle had travelled approximately 2 feet along the other, the rear quarter panel being scraped by the raised bumper of the parked truck (though this was not visible at first.) I then moved my vehicle forward about 4 feet to separate the vehicles and inspect for damage. I contacted my supervisor and told him what had happened so that he could take pictures and begin the required responses.</p>

2/13/2018	WRPS- PER- 2018- 0334	TX-Farm and TY-Farm, housekeeping for tumbleweed accumulation and litter/debris and Donning/Doffing instructions	<ol style="list-style-type: none"> <li>1. During the performance of Walk Your Spaces for TX-Farm and TY-Farm, housekeeping for tumbleweed accumulation and litter/debris and Donning/Doffing instructions discrepancies were observed.</li> <li>2. Resources need to be applied to remove tumbleweeds from the interior and exterior of respective farms.</li> <li>3. Resources need to be applied to remove litter/debris from the interior and exterior of respective farms.</li> <li>4. Donning &amp; Doffing Instructions for PPE need to be provided.</li> </ol>
2/13/2018	WRPS- PER- 2018- 0335	Sealed Radioactive Source (SrY90 / #C991) was found to have low levels of removable contamination	<p>Sealed Radioactive Source (SrY90 / #C991) was found to have low levels of removable contamination of 1,620 dpm/100 cm<sup>2</sup> Beta-Gamma and &lt; 20 dpm/100 cm<sup>2</sup> Alpha.</p> <p>After hearing a grinding noise when moving the source wheel to perform portable instrument source checks, the ETF HPT surveyed the source with a cotton swab and contamination was found.</p> <p>The area the source was used and its storage location were surveyed without finding any contamination.</p> <p>The source was properly bagged and tagged then placed in the Room 115 source cabinet which is an RMA.</p>
2/13/2018	WRPS- PER- 2018- 0336	Waste inventory transactions are not logged in a single location	<p>Waste inventory transactions are not logged in a single location. Inventory transactions are an essential aspect of operating history, a clear understanding of which is necessary for technical management of the waste storage system. The task of compiling records of transactions is time consuming and may not yield complete results.</p>

2/13/2018	WRPS-PER-2018-0337	T-Farm, housekeeping discrepancies were observed for tumbleweed accumulation and litter/debris	<ol style="list-style-type: none"> <li>1. During the performance of Walk Your Spaces for T-Farm, housekeeping discrepancies were observed for tumbleweed accumulation and litter/debris.</li> <li>2. Resources need to be applied to remove tumbleweeds from the interior and exterior of respective farms.</li> <li>3. Resources need to be applied to remove litter/debris from the interior and exterior of respective farms.</li> </ol>
2/13/2018	WRPS-PER-2018-0338	Evaluate the addition of an annual "office chair" inspection during the routine EAPC Facility Safety Inspection.	Evaluate the addition of an annual "office chair" inspection during the routine EAPC Facility Safety Inspection.
2/13/2018	WRPS-PER-2018-0339	Inaccurate ETF Bubbler System Causes Missed Required Action	At 0300 on 2/13 pumping of leachate at LERF Basin 43 did not occur per CSO-TR-108 as level indication per Bubbler Levels indicated low sump levels. On review it is believed that below freezing condition caused bubbler system to be inaccurate. At 0300 Bubbler Level was 0.2 previous to that at 2100 hrs. indicated level was 5.7. Sometime after 0800 on 12/13 Bubbler level was reported at 7.4 and pumped down to 6.0 with 105 gallons calculated to have been pumped.

2/13/2018	WRPS-PER-2018-0301	Functional test PCV-601-109 operation indicated that the valve was not operating as expected.	Preventative Maintenance package # 207242 to functional test PCV-601-109 operation indicated that the valve was not operating as expected. The mode should be that at 0% the valve is open, at 100% the valve is closed. Testing showed that the valve was open at 100% and closed at 0%. It appears this valve was incorrectly calibrated during previous PM. Current EAM PM package does not provide instructions on how correct the calibration while previous PRC pm package did.
2/13/2018	WRPS-PER-2018-0318	Radiological Instrument Out of Tolerance Report.	Radiological Instrument Out of Tolerance Report. 2360/43-93 Barcode Number SCLL8-0859/DTLLP-0950. As found measurements during calibration determined that as found Sr-90 efficiency and as found Tc-99 efficiency decreased by more than 20% and were less than the minimum specified efficiency. Sr-90 efficiency decreased from 31.3% to 19.2% (-42%). Tc-99 efficiency decreased from 13.7% to 7.61% (44%). Cs-137 efficiency decreased by more than 20% (25.7% to 16.6% (35.4%)), but remained greater than the minimum specified efficiency. See attached file SCLL8-0859 - DTLLP-0950 WRPS (002).pdf.
2/13/2018	WRPS-PER-2018-0340	Not all lags in schedule have detailed justification in the P6 notebook section	<p>Observation was documented in Management Observation WRPS-MOP-2018-0336, in February of 2018.</p> <p>During the last round of EVMS surveillance interviews with the Control Account Managers, the selected CAMs who had lags in their schedule were asked to provide an explanation for their use. Even though none of the CAMs interviewed had lag justifications in the P6 notebook section, all were able to explain how the lag properly modeled the execution of their planned work. Without further interviews with CAMs and their scheduling support team, it's unknown if this is universal for the 175 lags in the schedule, but our limited sampling did not find evidence for an inappropriate use of lags; merely the absence of justifications.</p> <p>Lag Usage at WRPS</p> <p>An export from the month-end November, 2017, SLCS Current (non-LAWPS) schedule was used to assess evaluate the number of lags in the WRPS schedule, including counts of the associated justifications in the P6 notebook section.</p> <p>Non-LAWPS</p> <ul style="list-style-type: none"> <li>* 54 Lags</li> <li>* Lag justifications: 6</li> <li>* Lag Durations: <ul style="list-style-type: none"> <li>o 1 Day: 16 lags</li> <li>o 2 - 10 Days: 9 lags</li> <li>o 11 - 22 Days: 17 lags</li> <li>o 22 - 44 Days: 4 lags</li> <li>o &gt; 44 Days: 8 lags</li> </ul> </li> </ul> <p>LAWPS</p> <ul style="list-style-type: none"> <li>* 121 Lags</li> <li>* Lag justifications: 0</li> <li>* Lag Durations: <ul style="list-style-type: none"> <li>o 1 Day: 5 lags</li> <li>o 2 - 10 Days: 98 lags</li> </ul> </li> </ul>

2/13/2018	WRPS- PER- 2018- 0341	222-5 Duct Level Office with climate control issues	Several offices located upstairs of 222S labs are cold and causing discomfort for those working in the area.
2/14/2018	WRPS- PER- 2018- 0343	Cold Vapor Atomic Absorption Instrumenta tion Data Incorrect and not reported to Customer	<p>The new Cold Vapor Atomic Absorption (CVAA) instruments were recently installed and the output file that is used to load results into OmniLIMS is different than the output file from the older instruments and output file is now bringing in the raw result instead of a less than detection limit value.</p> <p>The mercury calculation form was initially set up based on the older output file and needs to be changed to accommodate the new form. In the mercury calculation form when the results are added together and one of the results is less than 0 they appear to be subtracted instead of being added together.</p> <p>This caused the final result to be slightly less than it should be—0.166 instead of 0.167. The issue has been reported to WHL but has not been corrected in OmniLIMS to this point and unsure if the data has been reported to the customer or not. This is the only instance of wrong results being generated that we are aware of and the change is small and should have minimal if any affect.</p>
2/14/2018	WRPS- PER- 2018- 0342	Contaminati on was identified in the bed of a gator.	<p>While attempting to remove an RCV (John Deere Gator HO-01-237), from the CA at 241-C Farm, contamination was identified in the bed of the gator. Small area was identified by direct reading, and the 19,000 dpm beta/gamma (&lt;20dpm alpha) spec was removed with tape press. See RSR COR-1800327.</p> <p>The survey was correctly being performed to Survey Plan RCV-SP-003 Rev 005.</p> <p>Per the survey plan, the RCV was not removed from the CA, and is still stored in 241-C Farm.</p> <p>Removing the RCV from the CA is outside the scope of the survey plan at this point.</p> <p>It should be noted that the survey performed and the actions taken were appropriate and represent a good catch by the HPT performing the survey.</p>

2/14/2018	WRPS- PER- 2018- 0344	ETF-20B- 001, Sump Tank/Pump System Operation is past periodic review date	Periodic review of ETF-20B-001, Sump Tank/Pump System Operation is past its due date received date was 07/24/2017 due date was 09/09/2017. Periodic review of ETF-ARP-20B-001 received date was 02/05/2018 due date was 02/05/2018. Periodic reviews are not performed in accordance with TFC-OPS-OPER-C-13 in a timely manor.
2/14/2018	WRPS- PER- 2018- 0347	AN A Train Exhauster (296-A-44) experienced unplanned shutdown	AN A Train Exhauster (296-A-44) experienced an unplanned shutdown due to ongoing maintenance activities.
2/14/2018	WRPS- PER- 2018- 0330	Evaluate changing exhauster 296-A-21A from continuous operation to intermittent	Another unplanned shutdown of the 242-A K-1 building exhauster (296-A-21A) on 1/4/2018, resulting in an Environmental Notification and Trend Only PER, prompted renewed discussion on changing this exhauster's classification from continuous operation to intermittent.

2/14/2018	WRPS- PER- 2018- 0346	RadCon Procedure TF-RC-043 - tech smear count times unclear	Procedure TF-RC-043 provides direction for evaluation of tech smears for beta-gamma contamination with a GM instrument for 5 seconds and with a 2360 instrument for 15 seconds. RPP-53865 indicates that 5 seconds is sufficient for either instrument. The procedure also directs evaluating tech smears for alpha contamination for 60 seconds when using hand held instruments, while the technical basis document indicates that 25 seconds is sufficient for a 2360 and 30 seconds is sufficient with a PAM.
2/14/2018	WRPS- PER- 2018- 0348	296-P-49 (POR-126) and 296-P- 50 (POR- 127) exhausters found shutdown Feb 9 2018	Both 296-P-49 (POR-126) and 296-P-50 (POR-127) exhausters were found shutdown on February 9 at 0710.
2/14/2018	WRPS- PER- 2018- 0349	Revisions to RPP-SPEC- 43854 222-S Labs Industrial Control System	The RTM (RPP-SPEC-43854) for the 222-S labs Industrial Control System was found to require a few revisions. This Per acts to document the revisions needed pending implementation in the next revision cycle (the VFD upgrade this year).  <ol style="list-style-type: none"> <li>1. Alarm Set points tolerances will be removed from the RTM.</li> <li>2. Alarm Set points will be removed as allowed.</li> <li>3. Non-exact wording found in REQ-AHU-2 and REQ-AHUIL-6 will be revised in clarify intent.</li> <li>4. Requirement REQ-CWM-2 Will be removed</li> <li>5. Reference 4.1.7.4 will be removed from requirement REQ-AHIL-8</li> <li>6. Requirement REQ-CP-HCM-3 reference 4.1.4 will be updated to 4.1.5</li> <li>7. Table 12 preheat and re-heat requirements will be updated to define software requirements.</li> </ol>

2/14/2018	WRPS-PER-2018-0351	U-Farm, housekeeping discrepancy were observed for tumbleweed accumulation and litter/debris.	<ol style="list-style-type: none"> <li>1. During the performance of Walk Your Spaces for U-Farm, housekeeping discrepancies were observed for tumbleweed accumulation and litter/debris.</li> <li>2. Resources need to be applied to remove tumbleweeds from the interior and exterior of respective farms.</li> <li>3. Resources need to be applied to remove litter/debris from the interior and exterior of respective farms.</li> </ol>
2/14/2018	WRPS-PER-2018-0352	Housekeeping issue with storage of un-surveyed hard hats	<ol style="list-style-type: none"> <li>1. WRPS-PER-2017-2805 was generated to address housekeeping discrepancies with storage of hard hats in the Contamination Area.</li> <li>2. During a recent Walk Your Spaces MOR, hard hats were identified to still be stored in the Contamination Area.</li> <li>3. WRPS-PER-2017-2805 Evaluation attached to provide evaluations performed to correct original discrepancy.</li> </ol>
2/14/2018	WRPS-PER-2018-0345	MultiRae Pro instrument that is used to obtain TSR Flammable gas readings is not part of the M&TE program	<p>It was identified that the MultiRae Pro instrument that is used to obtain TSR Flammable gas readings is not part of the M&amp;TE program. TFC-PLN-64 states that instrumentation used for data collection to support the TSRs is subject to applicable requirements concerning the control of M&amp;TE. Instrumentation used for flammable gas readings is cited as a specific example of applicability. Below are some excerpts from the DSA and Plans.</p> <p>DSA Section 3.3.2.4 (page 3.3.2.4-3 starting on line 30) is reproduced below:</p> <p>In addition to the above, there are requirements to control tank farm instrumentation and these requirements are applicable to instrumentation used to verify parameters to comply with the TSRs. These requirements are documented in TFC-PLN-02, Quality Assurance Program Description (QAPD). Per the QAPD, tools, gauges, instruments, and other measuring and test equipment used for activities affecting quality are controlled, calibrated at specific periods, adjusted, and maintained to required accuracy limits. In addition, selection of measuring and test equipment is based on the type, range, accuracy, and tolerance needed to accomplish the required measurements for determining conformance to specified requirements. Calibration and control measures are not required for commercial equipment such as rulers, tape measures, levels, etc., if such equipment provides the required accuracy.</p> <p>Measuring and test equipment is typically portable and instrument selection, use, control, calibration, and maintenance is managed across three different programs. As described in TFC-PLN-02 the procedures for managing measuring and test equipment and the program for managing permanently installed instrumentation are as follows.</p> <ul style="list-style-type: none"> <li>•TFC-PLN-64, Industrial Hygiene Instrumentation Plan, establishes the requirements for the TOC industrial hygiene organization</li> </ul> <p>Consistent text is provided in Section 3.7, of TFC-PLN-64 which states:</p> <p>Instrumentation used for data collection to support the Technical Safety Requirements (i.e., hydrogen monitors for flammable gas readings) is subject to applicable requirements concerning the control of M&amp;TE of TFC-PLN-02. Quality assurance requirements will include appropriate quality levels for purchase of equipment and appropriate grade and purity levels for standards used to calibrate and functional check the equipment.</p>

2/14/2018	WRPS-PER-2018-0353	FCA W-80-043 Paint Flaking Off	The Fixed Contamination Area, FCA W-80-043, located inside WRPS-RMA-093 west of 241-TX farm, . The paint is flaking off and the FCA sign needs to be replaced. see attached photo
2/14/2018	WRPS-PER-2018-0354	ATS-310, Section 2.21, "Use of Equipment Control Tags and Labels" adherence by Operations employees	<p>Observed a LOTO installation to support the 219-S Cell entry for investigating leak location associated with the P-1 Pump.</p> <p>The COA provided a thorough pre-installation brief that addressed all of the requirements of DOE-0336. The COA accompanied the installers and the pipe-fitters in the field with a copy of DOE-0336 in hand. The Operations Chem Tech installers performed well. They read the TAF, Tag, and Label information out loud and used read-touch-read to reduce the likelihood of mistakes. The installation required independent and concurrent verification; the Operations Chem Tech's installed the LOTO in accordance with procedure; no issues.</p> <p>However, the process to lockout the necessary valves for 219-S entry involves removing a Building Operations Plaque and Lock. I asked about the need to record the removal and the Operations Chem Techs were aware of the requirement and stated that they were going to make that entry. I reviewed the Building Operations Plaque Log Sheet and noted that several 219-S entries were made without the corresponding Log Sheet entry that the Plaque was removed and/or installed (last entry was April 2017.). I discussed this with the FOMs and suggested that they take the Log with them to the field when installing or removing Building Operations Plaques and Locks. I also discussed the importance of PERS that serve to document our self identified issues.</p> <p>ATS-310, Section 2.21, "Use of Equipment Control Tags and Labels" states operations....."updates the Building Operations Plaque Log Sheet for each component." when removed "Completes the Building Operations Plaque Log Sheet and returns the plaque to the....."</p> <p>Step 4.11.1 states "Reviews ALL TAGS (Out-of-Service, and Long-Term Lay-Up) and building operations plaques at least annually to determine if they are still required, or need to be replaced." There is no evidence of any reviews.</p> <p>Step 4.11.1 states "Log sheets are maintained in process for the calendar year. At the end of each year, completed log sheets are submitted to the Operations Records Custodian for records processing in accordance with TFC-BSM-IRM-DC-C-02." Completed sheets date from 2001 for out-of-service, 2003 for Long-Term Lay-Up, and 1999 for Building Operations Plaques logs.</p>
2/14/2018	WRPS-PER-2018-0355	222-5, 11A Hot Cell Liquid Nitrogen Dewar Venting as a Safety Issue	<p>In room 11A of 222-5 laboratory, near the 11A3 hotcell. There is a vapor canister preparation station. As part of this station there is a XL-65 Liquid Nitrogen dewar. The safety on the dewar is 150psi. The safety will release through the day with no warning. This has resulted in a 150psi spray of gas in an employee's face, analytical paperwork and procedures to be blown around the area and will eventually result in spilled samples within the hotcells. Additionally, there is a radiological concern since 11A is an RBA.</p> <p>The dewar needs to be moved to another area (Corridor 8-N) or replaced with gas cylinders.</p>

2/15/2018	WRPS- PER- 2018- 0356	B-105 Video Inspection Camera and Light Depth	While performing an in tank SST video in B-105 and the camera could not focus on light ( ALBERG ) due to the condensation in the tank. When camera came into focus the video operator noticed that the light was resting in a salt cake hole. The work package called for a depth of 33.2'. the salt cake level was a foot below the side walls of tank. Per our Tank & Pipeline integrity expert the video crew was told to stop at 24', that distance also included the top hat. Area was secured.
2/15/2018	WRPS- PER- 2018- 0359	Justification of In-Service Leak Test and approval from owner Jim Sondall (ORP)	The 219-S pump replacement is a Tank Farm project managed by the Tank Farm Project Management Group. I just got a call from ORP. He was asking me about the 219-S Building P-1 pump replacement at the 222-S labs where an in-service leak test was performed to bring the new pump (P-1) back into service. The ORP rep indicated if we replaced a pump and used an in-service leak test (rather than hydrostatic test) to qualify the connections for service, then that should have required "owner" approval in accordance with the code (assuming 831.3, then it's Section 345.1(a)). The ORP rep informed me that the "owner" of these systems is not WRPS, but ORP with respect to the piping codes. The ORP rep provides those "owner" approvals for the tank farms.
2/15/2018	WRPS- PER- 2018- 0360	222-S Used Light Bulbs left out after being replaced, then properly sent to Universal Waste Storage	While on the monthly safety walk down of the auxiliary buildings around the 222-S complex on December 12, 2017, it was observed that some used light bulbs were sitting in the corner of a room after being replaced. Used light bulbs are Universal waste and must be managed and stored in the appropriate areas.

2/15/2018	WRPS- PER- 2018- 0357	Potential Puncture Wound During (b)(6) (b)(6) for AX02A Riser 5B Pump	Employee reported that he suffered a small puncture to the finger while performing (b)(6) on the radiological contaminated AX-102-02A Riser 05B pump. The work was being performed within a certified glovebag per work package 290128. The activity included cutting small steel cables that supported the submersible pump in the past while it was hanging vertical in the tank. The discharge hose was also to be cut using a portaband saw within the glovebag. Once the pump was severed from the discharge hose and cables cut and looped back and clamped to provide a loop, the contaminated pump would be sleeved out of the glovebag and rigged into a shielded box for eventual oil removal in preparations for shipment as waste. The work activity was being performed in a designated area outside the tank farms located west of Buffalo Street at 200 East.
2/15/2018	WRPS- PER- 2018- 0361	H-14- 106594 Sheets 1 – 3 Need to have ECNs incorporate d	<p>H-14-106594 Sheets 1 – 3 were identified as "reference" drawings in SPF. As such they were not updated as ECNs were work completed. This set of drawings documents pit painting diagram configuration and is critical to performance of waste transfer operations. Since the drawings need to be maintained and updated set of drawing should be classified as "support." As such, all the work completed ECNs need to be updated in the drawings.</p> <p>Sheet 1: 14 work completed ECNS and 3 Open ECNS  Sheet 2: 15 work completed ECNS and 1 Open ECNS  Sheet 3: 7 work completed ECNS and 1 Open ECNS</p> <p>With all of these work completed ECNs out against this drawing set (some as old as 2008) it is difficult to determine the actual field configuration and therefore presents a configuration management issue. It will be complicated to ensure that all the right pieces of information are included in the final product. This is due to some installing equipment and some being removed.</p>
2/15/2018	WRPS- PER- 2018- 0363	Environmen- tal Notification Thresholds Not Clearly Specified in Work Documents	While performing excavation work in AX Farm per WO 349638, personnel identified elevated radiological levels near the 241-AX 801A building. The levels found were within RWP limits. During a review meeting on 2/14/17, Environmental called for work under WO 349638 to pause as reported radiological levels were determined to exceed a Washington State Department of Health notification threshold. Further review revealed that notification levels had not been exceeded, and that text in WO 349638 did not clearly address circumstances under which Environmental should be notified of elevated radiological levels.

2/20/2018	WRPS- PER- 2018- 0364	Proto Torque Wrench Found Out of Tolerance	Proto Torque Wrench, Model # 6006NMC-TT, Serial# DNH52004 (M&TE #817-88-01-071) "As Found" reading during calibration was Out-Of-Tolerance. It was adjusted to manufacturer spec.
2/20/2018	WRPS- PER- 2018- 0366	Radiological Survey Report LE- 1702613	Radiological Survey Report LE-1702613 written 12/22/2017 is beyond the allowable time frame for review and approval as per TFC-ESHQ-RP_MON-C-27, 4.11 - Documentation of Radiological Surveys Using Survey Simple.
2/20/2018	WRPS- PER- 2018- 0358	DFLAW Program Integration Functional Areas	<p>On Wednesday, January 17, 2018, a team comprised of Subject Matter Experts (SMEs) from the Savannah River Remediation Liquid Waste (LW)/Salt Waste Processing Facility (SWPF) Integration Program and the Savannah River National Laboratory (SRNL) participated in a video teleconference (VTC) and presentation by the River Protection Project One System (OS) organization for the review and evaluation of DFLAW Program Integration Functional Areas.</p> <p>The purpose of the VTC held on January 17, 2018 was to perform an independent review of the OS integration functions to achieve DFLAW startup. The review evaluated efficiency and effectiveness of the integration function within the Washington River Protection System (WRPS) and in cooperation with the Waste Treatment and Immobilization Plant (WTP)-BNi and the Department of Energy – Office of River Protection (ORP) in execution of the duties and responsibilities as identified in the charter.</p> <p>This review focused on the technical functions of:</p> <ol style="list-style-type: none"> <li>1. Interface Control Documents (ICDs);</li> <li>2. The Integrated Schedule;</li> <li>3. Risk Management and Flowsheet Management and;</li> <li>4. The Governance Process</li> </ol> <p>The meeting resulted in discussion of 4 Good Practices, 2 Opportunities for Improvement, and 7 Recommendations (see attached SRR-SWPF-2018-005.pdf).</p> <p>Mission integration reviewed and evaluated the OFIs and Recommendations (see attached DFLAW Integration Assessment Report Response 180214.doc). The evaluation resulted in one appropriate action, as described below:</p> <p>Recommendation #7 – The assessment team recommends the processes being used with the National Laboratories and other Technology Providers be updated to reflect the actual processes and DOE's intent.</p> <p>Response: RPP-50471, One System Charter, will be revised to update the interface with the National Labs as recommended.</p> <p>Request that this PER be assigned to (b)(6)</p>

2/20/2018	WRPS-PER-2018-0367	Software Critical Error 796795	Bentley notified WRPS of software critical error 796795 affecting Bentley STAAD.Pro. STAAD.Pro has been used to analyze general service structures used in TOC SSCs. This software critical error may produce non-conservative results for analysis of wide flange profile members in axial compression and bending when designed to the Canadian code S16-09, and where the profile is determined to be class 1 or class 2.
2/20/2018	WRPS-PER-2018-0368	JRG Packages were not Signature Ready at the Time of the JRG Meeting	<p>PER TITLE: JRG Packages were not Signature Ready at the Time of the JRG Meeting</p> <p>Title: Performed IOS 18232; WRPS Joint Review Group Surveillance</p> <p>Summary: (The complete surveillance is attached)</p> <p>Integrated Oversight Schedule Number: 18232</p> <p>Division Performing the Assessment: ORP TOD</p> <p>Dates of Assessment: December 2017 through February 2018</p> <p>Assessment Lead: Ron Ciola</p> <p>Team Member(s): Brian Scrabeck, Brandon Reyes, Vanessa Turner</p> <p>Scope: This surveillance reviewed the Joint Review Group (JRG) process of Washington River Protection Solutions, LLC (WRPS) at 200 East and West and performed an effectiveness review on recent findings issued against the process. This report identified 1 Strength, 3 Findings and 2 Opportunities for Improvement.</p> <hr/> <p>Issue Type: Finding (Level 3) Significance Level: 1</p> <p>Statement: • 18232-TF-F01; JRG Packages were not Signature Ready at the Time of the JRG Meeting. (Priority Level 3, Ciola/Reyes February 2, 2018)</p> <p>Discussion: Procedure TFC-ESHQ-RP_ADM-C-11, Rev E-5; Joint Review Group provides clear requirements for, "signature ready" documents to be discussed at the JRG meetings. Regardless, documents often enter the JRG in a non-signature ready status, and some packages have been missing critical documents. OA No. 35054 identifies that during the JRG for WO No. 349667, 242-A Clean K-1 Exhaust Ember Screen, there were also multiple deficiencies in the AMW, as was identified in ORP TOD Finding 35165-TF-F01; ALARA Management Worksheet Contained Inconsistencies and Controls were not incorporated into the Work Package (Priority Level 3, Ciola, November 2, 2017, OA No. 35165(WRPS PER-2017-2518).</p> <p>OA No. 35683 (Reyes, January 25, 2018) identified that the JRG for WO No. 260742, AX-104 Remove Sluicer from Riser 5A, was scheduled to reconvene as a lifting plan was not in the JRG package materials, requiring a change to the work instruction. Radiological calculations were also not yet prepared.</p>
2/20/2018	WRPS-PER-2018-0369	DOE Facility Representatives have not been Receiving JRG Invitations	<p>PER TITLE: DOE Facility Representatives have not been Receiving JRG Invitations.</p> <p>Title: Performed IOS 18232; WRPS Joint Review Group Surveillance</p> <p>Summary: (The complete surveillance is attached)</p> <p>Integrated Oversight Schedule Number: 18232</p> <p>Division Performing the Assessment: ORP TOD</p> <p>Dates of Assessment: December 2017 through February 2018</p> <p>Assessment Lead: Ron Ciola</p> <p>Team Member(s): Brian Scrabeck, Brandon Reyes, Vanessa Turner</p> <p>Scope: This surveillance reviewed the Joint Review Group (JRG) process of Washington River Protection Solutions, LLC (WRPS) at 200 East and West and performed an effectiveness review on recent findings issued against the process. This report identified 1 Strength, 3 Findings and 2 Opportunities for Improvement.</p> <hr/> <p>Issue Type: Finding (Level 3) Significance Level: 1</p> <p>Statement: • 18232-TF-F02 - DOE Facility Representatives have not been Receiving JRG Invitations. (Priority Level 3) (Ciola/Turner, February 1, 2018)</p> <p>Discussion: According to TFC-ESHQ-RP-ADM_C-11; Joint Review Group, section 4.2.6, the Joint Review Group (JRG) Meeting Coordinator should "contact the necessary members and attendees of the JRG and arrange a meeting," and requires that the Facility Representative will receive an optional invitation to attend as a non-voting member.</p> <p>The Facility Representatives have routinely not been notified of JRGs, with a specific example noted in OA 34180 (Turner, June 8, 2017) associated with the JRG held for WO No. 207450 AX-102, Remove Thermocouple from Riser 7B.</p>

2/20/2018	WRPS-PER-2018-0370	Joint Review Group Materials should be distributed to all attendees with enough time to allow adequate review	<p>PER TITLE: Joint Review Group Materials should be distributed to all attendees with enough time to allow adequate review</p> <p>Title: Performed IOS 18232; WRPS Joint Review Group Surveillance</p> <p>Summary: (The complete surveillance is attached) Integrated Oversight Schedule Number: 18232 Division Performing the Assessment: ORP TOD Dates of Assessment: December 2017 through February 2018 Assessment Lead: Ron Ciola Team Member(s): Brian Scrobeck, Brandon Reyes, Vanessa Turner</p> <p>Scope: This surveillance reviewed the Joint Review Group (JRG) process of Washington River Protection Solutions, LLC (WRPS) at 200 East and West and performed an effectiveness review on recent findings issued against the process. This report identified 1 Strength, 3 Findings and 2 Opportunities for Improvement.</p> <hr/> <p>Issue Type: OFI (Opportunity for Improvement) Significance Level: 1</p> <p>Statement: • 18232-TF-001 – Joint Review Group Materials should be distributed to all attendees with enough time to allow adequate review. (Ciola, February 2, 2018)</p> <p>Discussion: According to section 4.2.7 of procedure, the JRG Meeting Coordinator shall, "Distribute JRG packets to the JRG members a minimum of 24 hours prior to the scheduled JRG meeting to allow for review.</p> <p>The 24 hour review may be waived by the JRG chairperson with concurrence from the JRG voting members." The wording in this section should be revisited to ensure that all attendees are provided the materials, not just the "JRG members".</p>
2/20/2018	WRPS-PER-2018-0371	JRG Procedure lists a PER as a Requirement, but fails to list ISMS Governing Documents	<p>PER TITLE: JRG Procedure lists a PER as a Requirement, but fails to list ISMS Governing Documents</p> <p>Title: Performed IOS 18232; WRPS Joint Review Group Surveillance</p> <p>Summary: (The complete surveillance is attached) Integrated Oversight Schedule Number: 18232 Division Performing the Assessment: ORP TOD Dates of Assessment: December 2017 through February 2018 Assessment Lead: Ron Ciola Team Member(s): Brian Scrobeck, Brandon Reyes, Vanessa Turner</p> <p>Scope: This surveillance reviewed the Joint Review Group (JRG) process of Washington River Protection Solutions, LLC (WRPS) at 200 East and West and performed an effectiveness review on recent findings issued against the process. This report identified 1 Strength, 3 Findings and 2 Opportunities for Improvement.</p> <hr/> <p>Issue Type: OFI (Opportunity for Improvement) Significance Level: 1</p> <p>Statement: • 18232-TF-002 - JRG Procedure lists a PER as a Requirement, but fails to list ISMS Governing Documents. (Ciola, February 2, 2018)</p> <p>Discussion: Section 7.1 of procedure TFC-ESHQ-RP_ADM-C-11, Rev E-5; Joint Review Group, lists a Problem Evaluation Request WRPS-PER-2016-2403 as a "Requirement", but fails to list ISMS governing documents. Section 4.1.3 of TFC-PLN-41; "Integrated Safety Management Description" provides that, "The JRG ensures the five ISMS core functions have been adequately applied to the work evolution under consideration."</p> <p>It would be appropriate to list an Industrial Safety Management System driver, such as, DOE M 450.4-1, "Integrated Safety Management System Manual" as a requirement. A review of the PER listed as the "Requirement", WRPS-PER-2016-2403; "Reactive Assessment by ORP TOD on AX-104 Spread of Contamination", indicates one action that directed a change to the JRG procedure, "AC05-01: Revise TFC-ESHQ-RP_ADM-C-11, Joint Review Group, for when chair waives the reassembly of the Joint Review Group for changes to high risk work packages that those changes are communicated to the work crew prior to the pre-job."</p>
2/20/2018	WRPS-PER-2018-0372	Required Joint Review Group Screening and Meeting Minutes forms not used	<p>PER TITLE: Required Joint Review Group Screening and Meeting Minutes forms not used</p> <p>Title: Performed IOS 18232; WRPS Joint Review Group Surveillance</p> <p>Summary: (The complete surveillance is attached) Integrated Oversight Schedule Number: 18232 Division Performing the Assessment: ORP TOD Dates of Assessment: December 2017 through February 2018 Assessment Lead: Ron Ciola Team Member(s): Brian Scrobeck, Brandon Reyes, Vanessa Turner</p> <p>Scope: This surveillance reviewed the Joint Review Group (JRG) process of Washington River Protection Solutions, LLC (WRPS) at 200 East and West and performed an effectiveness review on recent findings issued against the process. This report identified 1 Strength, 3 Findings and 2 Opportunities for Improvement.</p> <hr/> <p>Issue Type: Finding (Level 3) Significance Level: 1</p> <p>Statement: • 18232-TF-003 - Required Joint Review Group Screening and Meeting Minutes forms not used. (Priority Level 3, Ciola February 2, 2018)</p> <p>Discussion: A review of eleven work packages on WORA found that the JRG Screening forms and Meeting Minutes are not always documented per the requirements of TFC-ESHQ-RP_ADM-C-11, Rev E-5; Joint Review Group. Some packages were missing the screening form and/or meeting minutes (e.g. WO Nos. 178454, 260742), while others (e.g. WO Nos. 170284, 219582) were found to only contain portions of the meeting minutes such as Action Items.</p> <p>Section 4.3 of TFC-ESHQ-RP_ADM-C-11, Rev E-5; Joint Review Group requires that meeting minutes be documented on form (A-6003-912), and Section 3.3 requires this information be retained as a record.</p>

2/20/2018	WRPS- PER- 2018- 0373	Performed a Review of WRPS Operations Training	<p>PER TITLE: Contrary to requirements, PERs were not initiated for issues identified during assessments performed by the Environmental Protection organization</p> <p>Title: Review of Environmental Protection Management Oversight Program (MOP) Assessments</p> <p>Summary: ECD reviewed and evaluated the WRPS Environmental Protection organization's Management Oversight Program (MOP) assessments conducted during the first quarter of fiscal year 2018. The assessments performed were searched for in the WRPS Management Observation Program and Assessment Tracking System (MOPATS) using the search criterion: "Organization," "ESH&amp;Q," "Environmental Protection," with a start date of 10/01/2017 and end date of 12/31/2017. The search resulted in 50 MOPs. Three MOPs were draft and there were three MOPs for which the Topic/Description was judged to be not directly related to environmental protection/compliance. Therefore, 47 MOPs were evaluated. Four out of the 44 finalized MOPs contained issues but Problem Evaluation Requests (PERs) were not initiated for the four MOPs: WRPS-MOP-2017-2785, WRPS-MOP-2017-2850, WRPS-MOP-2017-3303 and WRPS-MOP-2017-3547 (see Finding 35646-TF-01).</p> <p>Generally, the WRPS Environmental Protection organization assessed a representative sample of topics related to environmental protection/compliance. The majority of MOPs were detailed and well-written. Out of the 47 assessments reviewed, issues were identified in four assessments but no PERs were initiated.</p> <hr/> <p>Issue Type: Finding (Level 3) Significance Level: 0 Statement: 35646-TF-F01 – Contrary to requirements, Problem Evaluation Requests were not initiated for issues identified during assessments performed by the Environmental Protection organization. (Priority Level 3, Joe Sondag) Discussion: During the first quarter of fiscal year 2018, the WRPS Environmental Protection organization performed 50 Management Oversight Performance (MOP) assessments. Four MOPs contained issues described within the MOP, but a corresponding Problem Evaluation Request was not initiated. The four MOPs and a brief description of the MOPs respective issue were:  1) WRPS-MOP-2017-2785 issue: Both ETF and 242-A Evaporator have the same leak detection monitoring requirement for the PC-5000 line 2) WRPS-MOP-2017-2850 issue: There were two issues identified with management of universal waste in an area immediately outside work being observed 3) WRPS-MOP-2017-3303 issue: Building 204AR in East Tank Farms does not have a danger keep out sign on the doors at the northeast side</p>
2/20/2018	WRPS- PER- 2018- 0374	Private vehicles are parking in an area that is posted	<p>Failure to follow postings. Private vehicles are parking in an area that is posted "No Private Vehicle Parking Beyond This Point" and parking spaces are posted "Government Vehicle Parking Only". This area is located south of 2101M. We need this parking for government vehicle for easy access to our work vehicle and so we don't waste time driving around looking for a place to park. Also our group shares the vehicle we have and we need to park them in the same area or we waste time searching for them in none government parking areas..</p>
2/20/2018	WRPS- PER- 2018- 0375	Operations Personnel Recorded as Overdue for Training in Enterprise Learning Management	<p>PER TITLE: Operations Personnel Recorded as Overdue for Training in Enterprise Learning Management</p> <p>Title: Performed a Review of WRPS Operations Training</p> <p>Summary: Performed a review of WRPS Operations Training The issues will be also discussed in the scheduled surveillance, 18012; Training Program Evaluation.</p> <p>Requirements:  <ul style="list-style-type: none"> <li>• DOE O 426.1A; Federal Technical Capability Program</li> <li>• DOE O 426.2, Admin Change, Personnel Selection, Training, Qualification, and Certification Requirements for DOE Nuclear Facilities</li> <li>• DOE-0355, Rev 0, Hanford Standardized Hazardous Waste Operation and Emergency Response Training</li> </ul> </p> <hr/> <p>Issue Type: Finding (Level 3) Significance Level: 1 Statement: 35744-TF-F01 - Operations Personnel Recorded as Overdue for Training in Enterprise Learning Management (Priority Level 3)(Ciola, January 25, 2018) Discussion: Several individuals at the Effluent Treatment Facility (ETF) were found to be overdue for continuing training(course 705511) and one Nuclear Chemical Operator (NCO) was four months overdue for Base Operations Initial OJT/E, Course 350340. Re-training was not yet scheduled for the NCO.</p> <p>Numerous other anomalies were found during review of Training Plans at ETF, Production Operations, and the 242-A facility. Personnel are not routinely meeting retraining requirements within the periodicity specified. Discussions with WRPS management indicates that training courses listed on Enterprise Learning Management training plans are often listed as a contingency, and are not "required", although TFC-BSM-TQ_ADD-C-02, REVA-1 Training Coordination cites that ELM is a system to track "required" training (section 5.0). An example is forklift training, which has been noted as past due for retrain. The assumption by management is that the individual will not be assigned the duty of forklift operation, but the assessor notes that the training remains on the plan as "required" and overdue for retrain.</p> <p>Other examples including respiratory protection courses listed as required and overdue for multiple individuals at the ETF, while these individuals are no longer required to maintain these qualifications. With some, Training Plans identify "Mask Fit" and SCBA as expired, but these individuals are solely qualified on PAPR hood. Another example is that HID 6902907 at the 242-A Evaporator is listed as requiring Course 354121; Supervisor Field OJT – Projects. The individual's Training Plan shows that the course has never been taken and isn't required by the facility manger. Training Plans should be maintained more accurately.</p>

2/20/2018	WRPS- PER- 2018- 0377	Training Tracking Databases Anomalies	<p>PER TITLE: Training Tracking Databases Anomalies</p> <p>Title: Performed a Review of WRPS Operations Training</p> <p>Summary: Performed a review of WRPS Operations Training The issues will be also discussed in the scheduled surveillance, 18012; Training Program Evaluation.</p> <p>Requirements:</p> <ul style="list-style-type: none"> <li>• DOE O 426.1A, Federal Technical Capability Program</li> <li>• DOE O 426.2, Admin Change, Personnel Selection, Training, Qualification, and Certification Requirements for DOE Nuclear Facilities</li> <li>• DOE-0355, Rev 0, Hanford Standardized Hazardous Waste Operation and Emergency Response Training</li> </ul> <hr/> <p>Issue Type: OFI (Opportunity for Improvement) Significance Level: 1</p> <p>Statement: 35744 TF-001 - Training Tracking Databases Anomalies. (Ciola, January 25, 2018)</p> <p>Discussion: Qualification and training procedures vaguely describe some processes in place to administer training at Tank Farms. An example is Section 3 of TFC-BSM-TQ-STD-11, Rev B-11, Manager Qualification Requirements, that merely identifies, "training requirements specific to each TIM management position, if not listed below, can be found in the individual training plans located in the electronic training database."</p> <p>There are multiple databases in use, including the Hanford Site Workers Eligibility Tool (HSWET) and ELM. It isn't apparent which database is being discussed. The procedure should reference TFC-BSM-TQ_ADD-C-02, REV A-1 Training Coordination, which describes the use of the Enterprise Learning Management (ELM) database.</p>
2/20/2018	WRPS- PER- 2018- 0168	242-A Evaporator System Integrity Assessment Report	RPP-RPT-60098, Rev. 0, "242-A Evaporator System Integrity Assessment Report," Recommendation 60098-01: Anchorage of the TK-C-100 condensate tank does not appear to meet the current seismic ductility requirements.
2/20/2018	WRPS- PER- 2018- 0169	242-A Evaporator System Integrity Assessment Report	RPP-RPT-60098, Rev. 0, "242-A Evaporator System Integrity Assessment Report," Recommendation 60098-02: Evaluate existing E-C-1 condenser anchorage to determine adequacy. The anchor bolts provided are different than the original connection design.

2/20/2018	WRPS- PER- 2018- 0170	242-A Evaporator System Integrity Assessment Report	RPP-RPT-60098, Rev. 0, "242-A Evaporator System Integrity Assessment Report," Recommendation 60098-03: Because the 242-A Evaporator is now being used less than previously and because layup conditions could be more critical than operating conditions, it is recommended that layup conditions be studied to determine if they are ideal. Furthermore, layup conditions should be recorded.
2/20/2018	WRPS- PER- 2018- 0171	242-A Evaporator System Integrity Assessment Report	RPP-RPT-60098, Rev. 0, "242-A Evaporator System Integrity Assessment Report," Recommendation 60098-04: Long-term layup of the carbon steel condensate components would be enhanced by sealing the system so that residual oxygen would be consumed.
2/20/2018	WRPS- PER- 2018- 0172	242-A Evaporator System Integrity Assessment Report	RPP-RPT-60098, Rev. 0, "242-A Evaporator System Integrity Assessment Report," Recommendation 60098-05: Since no information was found on the original pump skid structural integrity, either provide structural calculations for the existing P-B-2 pump skid or install the spare P-B-2 pump skid within two years.

2/20/2018	WRPS- PER- 2018- 0173	242-A Evaporator System Integrity Assessment Report	RPP-RPT-60098, Rev. 0, "242-A Evaporator System Integrity Assessment Report," Recommendation 60098-06: Two UT data points in the evaporator vessel at Location 3 [C-A-1 Vapor-Liquid Separator at centerline elevation of E-A-1 Reboiler discharge – drawing H-2-69340] Grid 3 positions DBB and K13B should be examined to determine a reason for the thickness differences compared to neighboring locations.  Similarly, the three points at Location 185 [mitered elbow on 28-in. recirculation line upstream of E-A-1 inlet – drawings H-2-69340 and H-2-99029] should be rechecked.
2/20/2018	WRPS- PER- 2018- 0174	242-A Evaporator System Integrity Assessment Report	RPP-RPT-60098, Rev. 0, "242-A Evaporator System Integrity Assessment Report," Recommendation 60098-07: Boroscope probe inspection of the reboiler steam side should occur every ten years and checked for radiological contamination as a confirmation that there are no leaks.
2/20/2018	WRPS- PER- 2018- 0175	242-A Evaporator System Integrity Assessment Report	RPP-RPT-60098, Rev. 0, "242-A Evaporator System Integrity Assessment Report," Recommendation 60098-08: WRPS should fully evaluate the use of steam condensate radiation monitoring.

2/20/2018	WRPS- PER- 2018- 0176	242-A Evaporator System Integrity Assessment Report	RPP-RPT-60098, Rev. 0, "242-A Evaporator System Integrity Assessment Report," Recommendation 60098-09: For UT, determine whether sufficient area (i.e., 20%) is examined for locations where localized corrosion/erosion could occur.
2/20/2018	WRPS- PER- 2018- 0177	242-A Evaporator System Integrity Assessment Report	RPP-RPT-60098, Rev. 0, "242-A Evaporator System Integrity Assessment Report," Recommendation 60098-10: UT measurements on stainless steel and carbon steel components should be done at the current locations at 15-year intervals (i.e., next one by December 2031).
2/20/2018	WRPS- PER- 2018- 0178	242-A Evaporator System Integrity Assessment Report	RPP-RPT-60098, Rev. 0, "242-A Evaporator System Integrity Assessment Report," Recommendation 60098-11: The FFS report (RPP-RPT-57213) included recommendations, but there is no documentation of these recommendations being closed or formal justifications provided as to why the recommendations are not needed.

2/20/2018	WRPS- PER- 2018- 0179	242-A Evaporator System Integrity Assessment Report	<p>RPP-RPT-60098, Rev. 0, "242-A Evaporator System Integrity Assessment Report," Recommendation 60098-12: A method of tracking all modifications to the 242-A Evaporator systems and components should be developed and maintained.</p> <ul style="list-style-type: none"> <li>• This tracking system should also include IQRPE reports.</li> <li>• It should also include closure of any IQRPE recommendations.</li> <li>• All work on primary and secondary containment components should be evaluated for IQRPE requirements while the design is in process.</li> </ul>
2/20/2018	WRPS- PER- 2018- 0180	242-A Evaporator System Integrity Assessment Report	<p>RPP-RPT-60098, Rev. 0, "242-A Evaporator System Integrity Assessment Report," Recommendation 60098-13: In readily accessible areas, such as the condenser room, facility personnel should actively look for coating defects on a routine basis on easily observable surfaces. A checklist or other written methodology would be helpful to remind facility personnel to perform and document this activity on a semi-annual basis. Additionally, this coating observation should also be done any time the floor matting is moved.</p>
2/20/2018	WRPS- PER- 2018- 0181	242-A Evaporator System Integrity Assessment Report	<p>RPP-RPT-60098, Rev. 0, "242-A Evaporator System Integrity Assessment Report," Recommendation 60098-14: In locations that are not readily available for routine walk-throughs (e.g., pump room, evaporator room, hot equipment storage room), visual evaluations of the coatings should be performed during scheduled entries, approximately semiannually.</p>

2/20/2018	WRPS- PER- 2018- 0182	242-A Evaporator System Integrity Assessment Report	RPP-RPT-60098, Rev. 0, "242-A Evaporator System Integrity Assessment Report," Recommendation 60098-15: An inspection of coatings should be conducted every 2 1/2 years by non-facility personnel. This should include all surfaces with the exception of those floor surfaces covered by matting, which should be inspected every 5 years.
2/20/2018	WRPS- PER- 2018- 0183	242-A Evaporator System Integrity Assessment Report	RPP-RPT-60098, Rev. 0, "242-A Evaporator System Integrity Assessment Report," Recommendation 60098-16: Coating defects in locations where the coating serves as secondary containment should be repaired no later than the commencement of the second campaign following the inspection or the next 2 1/2-year inspection, whichever occurs first.
2/20/2018	WRPS- PER- 2018- 0184	242-A Evaporator System Integrity Assessment Report	RPP-RPT-60098, Rev. 0, "242-A Evaporator System Integrity Assessment Report," Recommendation 60098-17: In rooms where radiation or other work hazards limit accessibility, coating inspections should be completed in conjunction with other planned work with coating repairs to be conducted during the next room entry.

2/20/2018	WRPS-PER-2018-0185	242-A Evaporator System Integrity Assessment Report	RPP-RPT-60098, Rev. 0, "242-A Evaporator System Integrity Assessment Report," Recommendation 60098-18: Thickness evaluation of the TK-C-100 condensate collection tank including seismic load combinations is recommended to be performed to verify the minimum thickness required to have sufficient structural strength to ensure that it will not collapse, rupture, or fail in a design seismic event. This evaluation shall include ASCE 7-10 loading conditions for hazardous equipment.
2/20/2018	WRPS-PER-2018-0186	242-A Evaporator System Integrity Assessment Report	RPP-RPT-60098, Rev. 0, "242-A Evaporator System Integrity Assessment Report," Recommendation 60098-19: Similar to 2007 IAR Recommendation 33306-26, minor surface corrosion was noted on the TK-C-100 tank and it appears unchanged over the last 10 years. While the IQRPE concurs with the WRPS disposition in RPP-RPT-60350, due to the importance of TK C 100 tank, it is recommended to continue to monitor the surface corrosion and repair if degradation is observed. It is further suggested that an observation by non-facility personnel be done in conjunction with the coating inspection every 5 years that is described in Recommendation 60098-15 (PER WRPS-PER-2018-0182).
2/20/2018	WRPS-PER-2018-0379	Training Program Elements and Management Systems are not described for ETF Personnel	<p>PER TITLE: Training Program Elements and Management Systems are not described for ETF Personnel</p> <p>Title: Performed a Review of WRPS Operations Training</p> <p>Summary:      Performed a review of WRPS Operations Training      The issues will be also discussed in the scheduled surveillance, 18012; Training Program Evaluation.</p> <p>Requirements:</p> <ul style="list-style-type: none"> <li>• DOE O 426.1A; Federal Technical Capability Program</li> <li>• DOE O 426.2, Admin Change, Personnel Selection, Training, Qualification, and Certification Requirements for DOE Nuclear Facilities</li> <li>• DOE-0355, Rev 0, Hanford Standardized Hazardous Waste Operation and Emergency Response Training</li> </ul> <p>-----</p> <p>Issue Type: Finding (Level 3) Significance Level: 1</p> <p>Statement:      35744-TF-F07 - Training Program Elements and Management Systems are not described for Effluent Treatment Facility Personnel. (Ciola, January 17, 2018)</p> <p>Discussion:      Table J-2 of the Washington River Protection Solutions, LLC (WRPS) Contract DE AC27 08RV14800 identifies training requirements as, DOE O 426.2, Admin Change, Personnel Selection, Training, Qualification, and Certification Requirements for DOE Nuclear Facilities, and DOE-0355, Rev 0, Hanford Standardized Hazardous Waste Operation and Emergency Response Training.</p> <p>DOE O 426.2 requirements are outlined in TFC-PLN-61, REV C-11; Tank Operations Contractor Training and Qualification Plan, but the plan is silent on DOE-0355, which discusses the details of HAZWOPER training requirements as applicable to Hanford contractors. While TFC-PLN-61 lists the underlying 29 CFR 1910 and WAC 173-303 HAZWOPER requirements in Section 7, it doesn't mention DOE-0355. Also, while TFC-PLN-61 references the Dangerous Waste Treatment plan at 222-5, it doesn't reference TFC-PLN-157, Rev A-1, Liquid Effluent Retention Facility/200 Area Effluent Treatment Facility Dangerous Waste Treatment Plan.</p> <p>Finally, the ETF is not identified as a Treatment and Disposal Facility under the auspices of TFC-PLN-07, Rev B-5; Dangerous Waste Training Plan. This procedure is also silent on the requirements of DOE-0355.</p> <p>Requirements:      TFC-PLN-80, Rev B; Procedure Program Description</p>

2/20/2018	WRPS- PER- 2018- 0187	242-A Evaporator System Integrity Assessment Report	RPP-RPT-60098, Rev. 0, "242-A Evaporator System Integrity Assessment Report," Recommendation 60098-20: As a repeat of 2007 RPP-RPT-33306 Integrity Assessment Report (IAR) Recommendation 33306-09, minor staining was observed in the evaporator room basement. The stain is cosmetic in nature and not affecting the 242 A Evaporator's ability for safe operations and does not affect the ability of the system to meet all requirements of WAC 173-303-640(2).  However a technical justification is required to close this recommendation.
2/20/2018	WRPS- PER- 2018- 0188	242-A Evaporator System Integrity Assessment Report	RPP-RPT-60098, Rev. 0, "242-A Evaporator System Integrity Assessment Report," Recommendation 60098-21: As a repeat of 2007 IAR Recommendation 33306-10, minor surface corrosion was observed in the evaporator room basement. A technical justification is required to close this recommendation.  The corrosion is cosmetic in nature and does not affect the 242-A Evaporator's ability for safe operations and does not affect the ability of the system to meet all requirements of WAC 173-303-640(2).  However, the current WRPS response (RPP-RPT-60350) only addressed ALARA and does not provide a technical justification to address the 2007 IAR recommendation. So, while ALARA is a very important consideration, it does not provide adequate technical justification for not completely addressing this item.
2/20/2018	WRPS- PER- 2018- 0189	242-A Evaporator System Integrity Assessment Report	RPP-RPT-60098, Rev. 0, "242-A Evaporator System Integrity Assessment Report," Recommendation 60098-22: As a repeat of 2007 IAR Recommendation 33306-03, minor staining was observed in the evaporator pump room at pump P-B-2. A technical justification should have been completed shortly after the 2007 IAR.

2/20/2018	WRPS- PER- 2018- 0190	242-A Evaporator System Integrity Assessment Report	RPP-RPT-60098, Rev. 0, "242-A Evaporator System Integrity Assessment Report," Recommendation 60098-23: Tank waste should continue to be managed in accordance with the Waste Compatibility Program (HNF-SD-WM-OCD-015), including the practice of performing waste compatibility assessments prior to transfers or additions.
2/20/2018	WRPS- PER- 2018- 0191	242-A Evaporator System Integrity Assessment Report	RPP-RPT-60098, Rev. 0, "242-A Evaporator System Integrity Assessment Report," Recommendation 60098-24: WRPS should continue to monitor corrosion efforts for detecting reboiler leaks.
2/20/2018	WRPS- PER- 2018- 0192	242-A Evaporator System Integrity Assessment Report	RPP-RPT-60098, Rev. 0, "242-A Evaporator System Integrity Assessment Report," Recommendation 60098-25: WRPS should continue to examine jumpers on removal for wear and measure new jumpers for baseline dimensions.

2/20/2018	WRPS- PER- 2018- 0193	242-A Evaporator System Integrity Assessment Report	RPP-RPT-60098, Rev. 0, "242-A Evaporator System Integrity Assessment Report," Recommendation 60098-26: Do the next integrity assessment in 15 years (by October 31, 2032) for the entire 242-A Evaporator System and include the PC-5000 line.
2/20/2018	WRPS- PER- 2018- 0194	tracking all modification s to the 242- A Evaporator systems and components	RPP-RPT-60098, Rev. 0, "242-A Evaporator System Integrity Assessment Report," Recommendation 60098-12: A method of tracking all modifications to the 242-A Evaporator systems and components should be developed and maintained. A 242-A Evaporator Integrity Program Plan that summarizes the work elements used to maintain compliance with WAC 173-303-640 regulations and the facility's RCRA final status operating permit conditions would facilitate the tracking process and help define its content.
2/20/2018	WRPS- PER- 2018- 0382	MOP/WSV Reviewed existing new/revisio n procedure processes in TFC-OPS- OPER-C-13.	Evaluated current programmatic and work flow documents and requirements and found that the requested graded approach/flexibility does not exist (i.e., we cannot, under current processes, streamline new or revisions as request by Operations).

2/20/2018	WRPS- PER- 2018- 0383	Chemical Hazard Training was issued with Errors in the Text and Test Questions	<p>PER TITLE: Chemical Hazard Training was issued with Errors in the Text and Test Questions</p> <p>Title: Performed a Review of WRPS Operations Training</p> <p>Summary: Performed a review of WRPS Operations Training The issues will be also discussed in the scheduled surveillance, 18012; Training Program Evaluation.</p> <p>Requirements:</p> <ul style="list-style-type: none"> <li>• DOE O 426.1A: Federal Technical Capability Program</li> <li>• DOE O 426.2, Admin Change, Personnel Selection, Training, Qualification, and Certification Requirements for DOE Nuclear Facilities</li> <li>• DOE-0355, Rev 0, Hanford Standardized Hazardous Waste Operation and Emergency Response Training</li> </ul> <hr/> <p>Issue Type: Finding (Level 3) Significance Level: 1</p> <p>Statement: 35744-TF-F03 - Chemical Hazard Training was issued with Errors in the Text and Test Questions. (Priority Level 3)(Ciola, January 25, 2018)</p> <p>Discussion: Recommendation RM3 of the Tank Vapors Assessment report, SRNL-RP-2014-00791, identified the need to specifically address chemical hazards in the tank farms as well as radiological hazards. Modifications to workforce training resulted.</p> <p>Training Bulletin, TB-18-001 was issued as a required reading in mid-January of 2018. It outlines the resultant changes in the chemical hazard training required for the workforce, breaking training into 3 tiers depending on a worker's potential for exposure.</p> <p>The bulletin was issued as a required reading in mid-January of 2018. Tier 2 training, Course 350357, is now required for many workers. The assessor's own on-line training roster indicated it wasn't assigned, although the bulletin indicates it's required for Tank Farms access.</p>
2/20/2018	WRPS- PER- 2018- 0393	Alara review of Work package	<p>An ALARA Review that was performed on 07/24/17 on work package WD-277166. However, the ALARA Review did not arrive for approval by the ALARA Chairman until 02/15/18. While this is not a clear violation of the ALARA Work Planning process, it does exhibit poor conduct of operations. Had there been lessons learned or process improvements detailed in this document, they may have not been redistributed into similar work activities due to the lengthy amount of time taken to finalize the work document.</p>
2/20/2018	WRPS- PER- 2018- 0402	YSI PH Meter, Model# PRO10 found out of tolerance	<p>YSI PH Meter, Model# PRO10, Serial # 16L100454 (M&amp;TE # 817-09-03-005) "As Found reading during calibration was Out-Of-Tolerance. It was adjusted to manufacturer spec.</p>

2/20/2018	WRPS-PER-2018-0406	YSI PH Meter found out of tolerance	YSI PH Meter,, Model# PRO10, Serial# 16L100455 (M&TE # 817-09-03-006) "As Found" reading during calibration was Out-Of-Tolerance. It was adjusted to manufacturer spec.
2/20/2018	WRPS-PER-2018-0424	Tank farm exhausters Permit Required Confined Spaces	The Safety Department has made the decision to classify the Tank Farm exhausters (the size of POR107) as Permit Required Confined Spaces. This determination was made some time ago. This decision has also put us in a state of noncompliance with the Confined Space Procedure, which requires all Permit Required Confined Spaces be posted at all times. Currently none of the exhaust trains with in Tank Farms are posted "Permit Required Confined Space".
2/20/2018	WRPS-PER-2018-0427	Medical and Dosimetry report layout	<p>Employee missed multiple HPMC "redraw"/follow-up appointments. Appointments were never input into Crystal Reports. Employee's last dated HPMC appointment was 1/3/18. HITS is the only program offering current appointment statuses other than notification emails from HPMC scheduler. In a large organization with multiple Learners and Learner Groups appointments can occasionally get missed.</p> <p>WRPS "Scheduled Training" (90 Days) has training, Dosimetry, and physicals all in one. Training layout is good however medical and Dosimetry appointments need to be weaved into the report rather than placed in the back. 90 days is too much info needed and often creates several pages pushing the medical and Dosimetry appointments to the back of the report. HPMC "redraws" and "evals" are not undated on printout.</p> <p>MSA Organization Reports page requires three different pages be printed (Dosimetry Schedule Dates, Enrollment Report, and Medical Schedule Dates) to gather all training/appointment information. HPMC "redraws" not undated on printout.</p> <p>HITS "Out of the Field Calendar" has all required information but an unfavorable print layout compared to the enrollment report and 90 day look ahead formats.</p>

2/20/2018	WRPS-PER-2018-0365	MBD rebalance AP-106 to AW-106	Performed MBD reset per TFC-ENG-CHEM-D-44 for the 241-AP-106 to 241-AW-106 waste transfer. See completed checklist 9 of TO-230-345 Rev. A-0.
2/20/2018	WRPS-PER-2018-0309	Construction's weekly stationary engine surveillance sheets	Review of stationary engine tracking sheets for Construction revealed that various pieces of stationary equipment had exceeded 200-hour periodic service interval required by WRPS stationary engine maintenance plan. These exceedances were evaluated against the current Hanford Air Operating Permit (Renewal 2, Revision B) to determine the need to report to WA Ecology. As no unit exceeding the periodic service interval is addressed in Renewal 2, Revision B; these exceedances do not constitute a violation of the Hanford Air Operating Permit, and notification per Section 4.10 of TFC-ESHQ-ENV_FS-C-01, REV H-1 is not required.
2/20/2018	WRPS-PER-2018-0428	MOP/WSV current OSHA Form 300A was not posted as required	Evaluated compliance with the requirement to post the OSHA Form 300A in each establishment no later than February 1 of the year following the year covered by the records and keep the posting in place until April 30 pursuant to 29 CFR 1904.32(b)(6) and TFC-ESHQ-S_CMLU-C-01, Rev C-8, SECTION 4.1.9. Facilities 1810TD and 1814TD did not have bulletin boards. Facilities 1812TD, 1816TD, and 1820TD had bulletin boards and had the OSHA Form 300A from January 30, 2017 for calendar year 2016 posted. The current OSHA Form 300A was not posted as required in the three facilities. (ISMS feedback and operations authorization)

2/20/2018	WRPS- PER- 2018- 0429	Hastings Mass Flowmeter, Model #203 found out of tolerance	Hastings Mass Flowmeter, Model #203, serial # 856 (M&TE# 820-28-03-006 "As Found" reading during calibration was "Out-Of-Tolerance. It was adjusted to manufacturer spec.
2/20/2018	WRPS- PER- 2018- 0430	Meriam Pressure Calibrator, Model#M200 0 out of tolerance	Meriam Pressure Calibrator, Model#M200, Serial # 0826101467 (M&TE #820-28-09-001) "As Found" reading during calibration was Out-Of-Tolerance. It was adjusted to manufacturer spec.
2/20/2018	WRPS- PER- 2018- 0431	Heise Pressure Indicator, Model# 901A, out of tolerance	Heise Pressure Indicator, Model# 901A, Serial# 59-32258 (M&TE 820-35-40-046) "As Found" reading during calibration was Out-Of-Tolerance. It was adjusted to manufacturer spec.

2/20/2018	WRPS-PER-2018-0432	Climbing device on ladder that is on the Surge berm tank needs to be removed.	Climbing device on ladder that is on the Surge berm tank needs to be removed. This climbing device is not required and creates a safety issue for employees that have to climb the ladder when getting to the top of this tank.
2/20/2018	WRPS-PER-2018-0389	Qualification Requirements are not described for Some Effluent Treatment Facility Personnel	<p>PER TITLE: Qualification Requirements are not described for Some Effluent Treatment Facility Personnel</p> <p>Title: Performed a Review of WRPS Operations Training</p> <p>Summary: Performed a review of WRPS Operations Training The issues will be also discussed in the scheduled surveillance, 18012; Training Program Evaluation.</p> <p>Requirements:</p> <ul style="list-style-type: none"> <li>• DOE O 426.1A, Federal Technical Capability Program</li> <li>• DOE O 426.2, Admin Change, Personnel Selection, Training, Qualification, and Certification Requirements for DOE Nuclear Facilities</li> <li>• DOE-0355, Rev 0, Hanford Standardized Hazardous Waste Operation and Emergency Response Training</li> </ul> <p>-----</p> <p>Issue Type: Finding (Level 3) Significance Level: 1</p> <p>Statement: 35744-TF-F04 - Qualification Requirements are not described for Some Effluent Treatment Facility Personnel (Priority Level 3)(Ciola, January 25, 2018)</p> <p>Discussion: The Training Implementation Matrix (TIM) does not discuss qualification requirements for Effluent Treatment Facility personnel as it's not a Hazard Category 1, 2, or 3 facility. Qualification requirements in the following procedures are specifically limited in applicability to those facilities described in the Training Implementation Matrix (TIM):</p> <ul style="list-style-type: none"> <li>• TFC-BSM-TQ-STD-11, Rev B-11, Manager Qualification Requirements,</li> <li>• TFC-BSM-STD-01, Rev D-14; Technical Staff and Technician Qualification Requirements, and</li> <li>• TFC-BSM-TQ-STD-03, REV C-0, Person-in-Charge Qualification Requirements.</li> </ul> <p>Note that Operator Qualification Program Description for ETF Operators is described in TFC-BSM-TQ-STD-17, Rev B-11.</p>
2/20/2018	WRPS-PER-2018-0433	2750E Door tape over lock	The South door located near the roll up door in 2750E was discovered to have tape plastered on the locking mechanism and handle, thus causing door to not be secure. This was discovered by an occupant on Tuesday morning ( Monday Holiday). The assumption is this may have occurred over the weekend.

2/20/2018	WRPS- PER- 2018- 0434	Elevator doors in 2750 stuck	The elevator doors in 2750 had closed and would not open, thus causing an occupant being stuck in the elevator.
2/21/2018	WRPS- PER- 2018- 0435	Exit lights over the doors in the Condenser room 4th floor and 5th floor levels are burnt out	The Exit lights over the doors in the Condenser room 4th floor and 5th floor levels are burnt out.
2/21/2018	WRPS- PER- 2018- 0314	Person slipped in S Farm	Person was in the course of completing routine radiological surveys on top of the diversion box cover in S-Farm Bone-yard and while stepping down off of the cover mis-judged the step causing her to jam the left knee and twisting her right ankle while falling to the ground. She had quite a bit of pain in the left knee but no other visible injuries.

2/21/2018	WRPS- PER- 2018- 0376	Operational drill communication and debrief needs more formality and consistency	<p>A management directed assessment of the ETF's Conduct of Operations performance was conducted from January 22, 2018 to February 01, 2018 as delineated in assessment plan, FY-2018-OPS-MD-0373 – Effluent Treatment Facility Conduct of Operations Performance Review.</p> <p><b>Observation:</b></p> <p>Operational drill communication and debrief needs more formality and consistency.</p> <p>An operations drill was conducted on 01/24/2018 by (b)(6) organization at the request of the Facility Manager due to upcoming work on Basin 43. The drill scenario was based on a possible event associated with pumping Basin 43 and has been conducted on 3 of the 4 rotating shifts to ensure they are comfortable with the response actions. Overall the response team responded well to the drill scenario. From a communications perspective, the following observations were noted:</p> <ul style="list-style-type: none"> <li>•The initial drill message by (b)(6) was (b)(6). A canned statement that (b)(6) operational drill (b)(6).</li> <li>•"This is a drill message" was not used consistently. It should be used before and after every drill statement. Sometimes it was before, sometimes it was after but never before and after.</li> <li>•A full post drill critique was not performed after conclusion of the drill. (b)(6) was not involved in the post drill critique. This was a missed opportunity to learn and improve.</li> </ul>
2/21/2018	WRPS- PER- 2018- 0378	Opportuniti es for on the spot coaching on radio communication that are less than adequate	<p>A management directed assessment of the ETF's Conduct of Operations performance was conducted from January 22, 2018 to February 01, 2018 as delineated in assessment plan, FY-2018-OPS-MD-0373 – Effluent Treatment Facility Conduct of Operations Performance Review.</p> <p><b>Observation:</b></p> <p>Opportunities for on the spot coaching on radio communication that are less than adequate should be embraced and acted on by facility leadership.</p>
2/21/2018	WRPS- PER- 2018- 0380	ETF needs to improve communication between field work and CRO when work is started and completed	<p>A management directed assessment of the ETF's Conduct of Operations performance was conducted from January 22, 2018 to February 01, 2018 as delineated in assessment plan, FY-2018-OPS-MD-0373 – Effluent Treatment Facility Conduct of Operations Performance Review.</p> <p><b>Observation:</b></p> <p>ETF needs to improve communication between field work and CRO when work is started and completed. It appears that there is consistently good communication prior to work beginning but often crisp communication is lacking at the end of the work evolution which leaves plant status in a state of uncertainty for the CRO.</p>

2/21/2018	WRPS- PER- 2018- 0381	SOMs are carrying temporary modification for the LERF Basin 43 piping system on their turnover checklist.	<p>A management directed assessment of the ETF's Conduct of Operations performance was conducted from January 22, 2018 to February 01, 2018 as delineated in assessment plan, FY-2018-OPS-MD-0373 – Effluent Treatment Facility Conduct of Operations Performance Review.</p> <p>Finding:</p> <p>SOMs are carrying temporary modification for the LERF Basin 43 piping system on their turnover checklist that is not in compliance with TFC-OPS-OPER-C-11 REVA-19 Equipment Temporary Modifications and Bypasses requirements. The temp modification has been installed for greater than 90 days without an approved extension, it is not tracked via System Deviations and not in the Daily Report.</p>
2/21/2018	WRPS- PER- 2018- 0384	There are multiple informal status boards in the ETF Control Room	<p>A management directed assessment of the ETF's Conduct of Operations performance was conducted from January 22, 2018 to February 01, 2018 as delineated in assessment plan, FY-2018-OPS-MD-0373 – Effluent Treatment Facility Conduct of Operations Performance Review.</p> <p>Observation:</p> <p>There are multiple informal status boards in the ETF Control Room that are used to update the oncoming shift on the Facility's status. There is no authentication of status boards to document that the information is accurate and up to date.</p>
2/21/2018	WRPS- PER- 2018- 0385	The ETF relies on the use of paper log keeping	<p>A management directed assessment of the ETF's Conduct of Operations performance was conducted from January 22, 2018 to February 01, 2018 as delineated in assessment plan, FY-2018-OPS-MD-0373 – Effluent Treatment Facility Conduct of Operations Performance Review.</p> <p>Observation:</p> <p>The ETF relies on the use of paper log keeping. The development and deployment of electronic tools such as log keeping, turnover checklist and equipment status boards should be considered.</p>

2/21/2018	WRPS- PER- 2018- 0386	On 01/22/2018 (b)(6) (b)(6) that improper valve position (600-109)	<p>A management directed assessment of the ETF's Conduct of Operations performance was conducted from January 22, 2018 to February 01, 2018 as delineated in assessment plan, FY-2018-OPS-MD-0373 – Effluent Treatment Facility Conduct of Operations Performance Review.</p> <p><b>Finding:</b></p> <p>On 01/22/2018 the ETF (b)(6) that improper valve position (600-109) required an event investigation and notifications.</p>
2/21/2018	WRPS- PER- 2018- 0387	(b)(6) does not encourage the use of the PER	<p>A management directed assessment of the ETF's Conduct of Operations performance was conducted from January 22, 2018 to February 01, 2018 as delineated in assessment plan, FY-2018-OPS-MD-0373 – Effluent Treatment Facility Conduct of Operations Performance Review.</p> <p><b>Observation:</b></p> <p>(b)(6) does not encourage the use of the PER process to document and investigate operational upsets, abnormal conditions, potential safety items, and process improvements.</p>
2/21/2018	WRPS- PER- 2018- 0388	(b)(6) are (b)(6) on how to navigate through the PER process.	<p>A management directed assessment of the ETF's Conduct of Operations performance was conducted from January 22, 2018 to February 01, 2018 as delineated in assessment plan, FY-2018-OPS-MD-0373 – Effluent Treatment Facility Conduct of Operations Performance Review.</p> <p><b>Observation:</b></p> <p>(b)(6) are (b)(6) on how to navigate through the PER process.</p>

2/21/2018	WRPS- PER- 2018- 0390	There are unclear roles/responsibilities and chain of command within the ETF Operations Management chain	<p>A management directed assessment of the ETF's Conduct of Operations performance was conducted from January 22, 2018 to February 01, 2018 as delineated in assessment plan, FY-2018-OPS-MD-0373 – Effluent Treatment Facility Conduct of Operations Performance Review.</p> <p>Finding: There are unclear roles/responsibilities and chain of command within the ETF Operations Management chain.</p>
2/21/2018	WRPS- PER- 2018- 0391	There is a lack of compliance with rolling schedule process at the ETF as delineated in TFC-OPS-OPER-C-65.	<p>A management directed assessment of the ETF's Conduct of Operations performance was conducted from January 22, 2018 to February 01, 2018 as delineated in assessment plan, FY-2018-OPS-MD-0373 – Effluent Treatment Facility Conduct of Operations Performance Review.</p> <p>Finding: There is a lack of compliance with rolling schedule process at the ETF as delineated in TFC-OPS-OPER-C-65.</p>
2/21/2018	WRPS- PER- 2018- 0392	Conduct of Operations standards are not being consistently upheld by all levels of management and craft	<p>A management directed assessment of the ETF's Conduct of Operations performance was conducted from January 22, 2018 to February 01, 2018 as delineated in assessment plan, FY-2018-OPS-MD-0373 – Effluent Treatment Facility Conduct of Operations Performance Review.</p> <p>Finding: Conduct of Operations standards are not being consistently upheld by all levels of management and craft, predominantly with procedure compliance.</p>

2/21/2018	WRPS- PER- 2018- 0394	Communication of ETF events and real time lessons learned are not adequately shared with operating staff.	<p>A management directed assessment of the ETF's Conduct of Operations performance was conducted from January 22, 2018 to February 01, 2018 as delineated in assessment plan, FY-2018-OPS-MD-0373 – Effluent Treatment Facility Conduct of Operations Performance Review.</p> <p><b>Observation:</b> Communication of ETF events and real time lessons learned are not adequately shared with operating staff.</p>
2/21/2018	WRPS- PER- 2018- 0395	The ETF (b)(6) that feels supported	<p>A management directed assessment of the ETF's Conduct of Operations performance was conducted from January 22, 2018 to February 01, 2018 as delineated in assessment plan, FY-2018-OPS-MD-0373 – Effluent Treatment Facility Conduct of Operations Performance Review.</p> <p><b>Observation:</b> The ETF (b)(6) that feels supported by one another and presents a unified front on sound conduct of operations principles and radiological control practices.</p>
2/21/2018	WRPS- PER- 2018- 0396	An unhealthy friction and confrontation exists between (b)(6) and (b)(6)	<p>A management directed assessment of the ETF's Conduct of Operations performance was conducted from January 22, 2018 to February 01, 2018 as delineated in assessment plan, FY-2018-OPS-MD-0373 – Effluent Treatment Facility Conduct of Operations Performance Review.</p> <p><b>Observation:</b> An unhealthy friction and confrontation exists between (b)(6) and (b)(6) while performing operations and maintenance activities.</p>

2/21/2018	WRPS-PER-2018-0397	ETF operations (b)(6) with the suite of WRPS Conduct of Operations	<p>A management directed assessment of the ETF's Conduct of Operations performance was conducted from January 22, 2018 to February 01, 2018 as delineated in assessment plan, FY-2018-OPS-MD-0373 – Effluent Treatment Facility Conduct of Operations Performance Review.</p> <p><b>Observation:</b></p> <p>ETF operations staff (b)(6) with the suite of WRPS Conduct of Operations administrative procedures. Although not (b)(6) (b)(6)</p>
2/21/2018	WRPS-PER-2018-0398	TF/WRPS needs to develop a life-cycle schedule and/or plan needs to address aging facility issues	<p>A management directed assessment of the ETF's Conduct of Operations performance was conducted from January 22, 2018 to February 01, 2018 as delineated in assessment plan, FY-2018-OPS-MD-0373 – Effluent Treatment Facility Conduct of Operations Performance Review.</p> <p><b>Observation:</b></p> <p>ETF/WRPS needs to develop a life-cycle schedule and/or plan needs to address aging facility issues and major upgrades needed.</p>
2/21/2018	WRPS-PER-2018-0399	An overall comprehensive conduct of operations improvement plan is needed for ETF	<p>A management directed assessment of the ETF's Conduct of Operations performance was conducted from January 22, 2018 to February 01, 2018 as delineated in assessment plan, FY-2018-OPS-MD-0373 – Effluent Treatment Facility Conduct of Operations Performance Review.</p> <p><b>Observation:</b></p> <p>An overall comprehensive conduct of operations improvement plan is needed for ETF. It should address the findings/observations identified in this assessment report along with the following recommendations:</p> <ul style="list-style-type: none"> <li>a. Perform a safety culture survey across ETF.</li> <li>b. Develop a systematic review and upgrade of ETF Technical Procedures to ensure procedures can be worked as written and the procedures support safe/compliant task execution commensurate with activity risk.</li> <li>c. Continue assignment of at least one full time Conduct of Operations Mentor/Coach(s) to support continued improvement of ETF Operations.</li> <li>d. Develop an ETF staffing plan that helps remove administrative burden from personnel key to improving conduct of operations.</li> </ul>

2/21/2018	WRPS- PER- 2018- 0400	TFC-OPS- OPER-C-07 does not require documentati on of mid- shift relief which is not in accordance with DOE 422.1	<p>A management directed assessment of the ETF's Conduct of Operations performance was conducted from January 22, 2018 to February 01, 2018 as delineated in assessment plan, FY-2018-OPS-MD-0373 – Effluent Treatment Facility Conduct of Operations Performance Review.</p> <p><b>Finding:</b></p> <p>TFC-OPS-OPER-C-07 does not require documentation of mid-shift relief which is not in accordance with DOE 422.1 requirements.</p>
2/21/2018	WRPS- PER- 2018- 0401	During interviews with (b)(6) (b)(6) and (b)(6) was discovered that (b)(6)  (b)(6)	<p>A management directed assessment of the ETF's Conduct of Operations performance was conducted from January 22, 2018 to February 01, 2018 as delineated in assessment plan, FY-2018-OPS-MD-0373 – Effluent Treatment Facility Conduct of Operations Performance Review.</p> <p><b>Observation:</b></p> <p>During interviews with (b)(6) and (b)(6) it was discovered that (b)(6) it appears that (b)(6) does not have access to new logbooks due to a perceived records requirement. This was discussed with the WRPS Records SME who stated that it is acceptable for (b)(6) to have blank logbooks and prior to issuance to (b)(6) write the next sequential records number (e.g. ETF Control Room 001) on the cover of the logbook.</p>
2/21/2018	WRPS- PER- 2018- 0403	The ETF (b)(6) does not maintain a logbook but rather (b)(6)  as needed	<p>A management directed assessment of the ETF's Conduct of Operations performance was conducted from January 22, 2018 to February 01, 2018 as delineated in assessment plan, FY-2018-OPS-MD-0373 – Effluent Treatment Facility Conduct of Operations Performance Review.</p> <p><b>Observation:</b></p> <p>The ETF (b)(6) does not maintain a logbook but rather (b)(6) as needed. The team recommends that (b)(6) maintain their own logbook.</p>

2/21/2018	WRPS- PER- 2018- 0404	(b)(6) and (b)(6) expressed displeasure with the existing type of logbook they are using	<p>A management directed assessment of the ETF's Conduct of Operations performance was conducted from January 22, 2018 to February 01, 2018 as delineated in assessment plan, FY-2018-OPS-MD-0373 – Effluent Treatment Facility Conduct of Operations Performance Review.</p> <p><b>Observation:</b> (b)(6) and (b)(6) expressed displeasure with the existing type of logbook they are using (carbon copy type), because the pages of the logbook easily tear out of the logbook and become difficult to manage. They would prefer to a hard backed logbook.</p>
2/21/2018	WRPS- PER- 2018- 0405	Event recognition and follow on notifications that do not meet an ADP needs improvement	<p>A management directed assessment of the ETF's Conduct of Operations performance was conducted from January 22, 2018 to February 01, 2018 as delineated in assessment plan, FY-2018-OPS-MD-0373 – Effluent Treatment Facility Conduct of Operations Performance Review.</p> <p><b>Observation:</b> Event recognition and follow on notifications that do not meet an ADP needs improvement. See WRPS-MOP-2018-0347 &amp; WRPS-MOP-2018-0148.</p>
2/21/2018	WRPS- PER- 2018- 0407	During the influent filter change out, items were not released from CA controls	<p>A management directed assessment of the ETF's Conduct of Operations performance was conducted from January 22, 2018 to February 01, 2018 as delineated in assessment plan, FY-2018-OPS-MD-0373 – Effluent Treatment Facility Conduct of Operations Performance Review.</p> <p><b>Finding:</b> During the Influent filter change out, items were not released from CA controls in accordance with IAW TF-RC-043 A-2, Perform Release Surveys for Material and Equipment.</p>

2/21/2018	WRPS- PER- 2018- 0408	Nine of thirteen RSRs reviewed did not list a unique item number for radiological and/or industrial hygiene equipment	<p>A management directed assessment of the ETF's Conduct of Operations performance was conducted from January 22, 2018 to February 01, 2018 as delineated in assessment plan, FY-2018-OPS-MD-0373 – Effluent Treatment Facility Conduct of Operations Performance Review.</p> <p>Finding:</p> <p>Nine of thirteen RSRs reviewed did not list a unique item number for radiological and/or industrial hygiene equipment surveyed for released from contamination controls IAW TFC-ESHQ-RP_ADM-P-09, REV E-8 Section 4.3.10 1st bullet.TFC-ESHQ-RP_ADM-P-09, REV E-8 Section 4.3.10 1st bullet.</p>
2/21/2018	WRPS- PER- 2018- 0409	Five percent (30 of 550) of entries recorded in ACES did not have a corresponding signature on the RWP	<p>A management directed assessment of the ETF's Conduct of Operations performance was conducted from January 22, 2018 to February 01, 2018 as delineated in assessment plan, FY-2018-OPS-MD-0373 – Effluent Treatment Facility Conduct of Operations Performance Review.</p> <p>Observation:</p> <p>Five percent (30 of 550) of entries recorded in ACES did not have a corresponding signature on the RWP Acknowledgement Review Form. This is not IAW TFC-ESHQ-RP_RWP-C-04, Radiological Work Permits requirements.</p> <p>NOTE: This was not listed as a finding due to the low percentage (5.5%) of errors.</p>
2/21/2018	WRPS- PER- 2018- 0410	HPT performed a removable contamination survey (technical smear) on yellow waste bags inside a posted CA.	<p>A management directed assessment of the ETF's Conduct of Operations performance was conducted from January 22, 2018 to February 01, 2018 as delineated in assessment plan, FY-2018-OPS-MD-0373 – Effluent Treatment Facility Conduct of Operations Performance Review.</p> <p>Observation:</p> <p>HPT performed a removable contamination survey (technical smear) on yellow waste bags inside a posted CA. After taking the smears the bags were allowed to be placed on the floor inside the CA while the smears were counted. When the smear results revealed no contamination, the bags were removed from the CA and placed on a cart located in the RBA.</p>

2/21/2018	WRPS- PER- 2018- 0411	PPE (athletic shoes) worn at the LERF Basins did not comply with the requirements	<p>A management directed assessment of the ETF's Conduct of Operations performance was conducted from January 22, 2018 to February 01, 2018 as delineated in assessment plan, FY-2018-OPS-MD-0373 – Effluent Treatment Facility Conduct of Operations Performance Review.</p> <p><b>Finding:</b></p> <p>PPE (athletic shoes) worn at the LERF Basins did not comply with the requirements in TFC-ESHQ-5_15-C-02 Personal Protective Equipment.</p>
2/21/2018	WRPS- PER- 2018- 0412	Although improving, qualified, and proficient (b)(6) staffing levels for facility operations is not sufficient	<p>A management directed assessment of the ETF's Conduct of Operations performance was conducted from January 22, 2018 to February 01, 2018 as delineated in assessment plan, FY-2018-OPS-MD-0373 – Effluent Treatment Facility Conduct of Operations Performance Review.</p> <p><b>Observation:</b></p> <p>Although improving, qualified, and proficient (b)(6) staffing levels for facility operations is not sufficient without routine use of overtime.</p>
2/21/2018	WRPS- PER- 2018- 0413	(b)(6) could benefit from additional technical/administration support.	<p>A management directed assessment of the ETF's Conduct of Operations performance was conducted from January 22, 2018 to February 01, 2018 as delineated in assessment plan, FY-2018-OPS-MD-0373 – Effluent Treatment Facility Conduct of Operations Performance Review.</p> <p><b>Observation:</b></p> <p>(b)(6) could benefit from additional technical/administration support.</p>

2/21/2018	WRPS- PER- 2018- 0414	ETF procedures are not in compliance with the First Time Use process as defined in TFC-OPS- OPER-C-13	<p>A management directed assessment of the ETF's Conduct of Operations performance was conducted from January 22, 2018 to February 01, 2018 as delineated in assessment plan, FY-2018-OPS-MD-0373 – Effluent Treatment Facility Conduct of Operations Performance Review.</p> <p>Finding: ETF procedures are not in compliance with the First Time Use process as defined in TFC-OPS-OPER-C-13, section 4.10.</p>
2/21/2018	WRPS- PER- 2018- 0415	ETF-60I-003 (step 5.6.1) is performed every hour during Evaporator Operation	<p>A management directed assessment of the ETF's Conduct of Operations performance was conducted from January 22, 2018 to February 01, 2018 as delineated in assessment plan, FY-2018-OPS-MD-0373 – Effluent Treatment Facility Conduct of Operations Performance Review.</p> <p>Finding: ETF-60I-003 (step 5.6.1) is performed every hour during Evaporator Operation. This procedure is a CONTINUOUS use procedure yet the procedure was not in hand during performance of the step.</p>
2/21/2018	WRPS- PER- 2018- 0416	ETF-30-001, ETF Control Room, MTT and STT Operator Round were performed with unintentiona lly grayed out	<p>A management directed assessment of the ETF's Conduct of Operations performance was conducted from January 22, 2018 to February 01, 2018 as delineated in assessment plan, FY-2018-OPS-MD-0373 – Effluent Treatment Facility Conduct of Operations Performance Review.</p> <p>Finding: ETF-30-001, ETF Control Room, MTT and STT Operator Round were performed with unintentionally grayed out readings and not revised using the approved procedure process.</p>

2/21/2018	WRPS- PER- 2018- 0417	The change control process for ETF process memorandums is not rigorous or consistent.	<p>A management directed assessment of the ETF's Conduct of Operations performance was conducted from January 22, 2018 to February 01, 2018 as delineated in assessment plan, FY-2018-OPS-MD-0373 – Effluent Treatment Facility Conduct of Operations Performance Review.</p> <p>Observation:</p> <p>The change control process for ETF process memorandums is not rigorous or consistent.</p> <p>A review of process memorandum ETF-18-001 and ETF-18-002 noted an opportunity for improvement in clearly indicating approval of redline changes. Specifically page 2 of process memo ETF-18-001 had multiple changes and approval for each change was not clearly marked. This was discussed with the ETF engineer who made the changes. The assessment team coached the engineer to initial each line that was changed or mark each change that was associated with the approval (e.g., mark all changes associated with the first change on the page with a #1 and all changes associated with the second change with a #2).</p>
2/21/2018	WRPS- PER- 2018- 0418	The Purpose and Scope section in rounds procedure ETF-30-001 is redundant to TFC-OPS-OPER-C-60	<p>A management directed assessment of the ETF's Conduct of Operations performance was conducted from January 22, 2018 to February 01, 2018 as delineated in assessment plan, FY-2018-OPS-MD-0373 – Effluent Treatment Facility Conduct of Operations Performance Review.</p> <p>Observation:</p> <p>The Purpose and Scope section in rounds procedure ETF-30-001 is redundant to TFC-OPS-OPER-C-60 and in one case contradicts TFC-OPS-OPER-C-60 with respect to red circle criteria for check mark readings.</p>
2/21/2018	WRPS- PER- 2018- 0419	ETF procedures are not formatted with sufficient instruction or flexibility to be vectored to by work packages	<p>A management directed assessment of the ETF's Conduct of Operations performance was conducted from January 22, 2018 to February 01, 2018 as delineated in assessment plan, FY-2018-OPS-MD-0373 – Effluent Treatment Facility Conduct of Operations Performance Review.</p> <p>Observation:</p> <p>ETF procedures are not formatted with sufficient instruction or flexibility to be vectored to by work packages or other procedures.</p>

2/21/2018	WRPS- PER- 2018- 0420	ETF does not provide gap training on the procedure revision process and software	<p>A management directed assessment of the ETF's Conduct of Operations performance was conducted from January 22, 2018 to February 01, 2018 as delineated in assessment plan, FY-2018-OPS-MD-0373 – Effluent Treatment Facility Conduct of Operations Performance Review.</p> <p>Observation: ETF does not provide gap training on the procedure revision process and software (WRAP, eDARF, etc.) as described in TFC-OPS-OPER-C-13.</p>
2/21/2018	WRPS- PER- 2018- 0421	The ETF should develop a single WRPS administrative procedure that documents the expected behaviors	<p>A management directed assessment of the ETF's Conduct of Operations performance was conducted from January 22, 2018 to February 01, 2018 as delineated in assessment plan, FY-2018-OPS-MD-0373 – Effluent Treatment Facility Conduct of Operations Performance Review.</p> <p>Observation: The ETF should develop a single WRPS administrative procedure that documents the expected behaviors for using procedures, work packages, and other technical instructions that drive field work.</p>
2/21/2018	WRPS- PER- 2018- 0422	The ETF Intermittent Shift Instructions should be reviewed daily	<p>A management directed assessment of the ETF's Conduct of Operations performance was conducted from January 22, 2018 to February 01, 2018 as delineated in assessment plan, FY-2018-OPS-MD-0373 – Effluent Treatment Facility Conduct of Operations Performance Review.</p> <p>Observation: The ETF Intermittent Shift Instructions should be reviewed daily and have a revision issued that removes completed tasks, retains tasks in progress, and adds new information/direction for the week as identified by TFC-OPS-OPER-C-40, Step 4.1.1.2.</p>

2/21/2018	WRPS-PER-2018-0423	The ETF Intermittent Shift Instructions should be available for SOM turnover at 1630 hours	<p>A management directed assessment of the ETF's Conduct of Operations performance was conducted from January 22, 2018 to February 01, 2018 as delineated in assessment plan, FY-2018-OPS-MD-0373 – Effluent Treatment Facility Conduct of Operations Performance Review.</p> <p>Observation:</p> <p>The ETF Intermittent Shift Instructions should be available for SOM turnover at 1630 hours for newly issued or revised Shift instructions.</p>
2/21/2018	WRPS-PER-2018-0425	ETF-30-001, ETF-30-003, ETF-30-005 and ETF-30-52748 contain responsibilities that are not aligned with TFC-OPS-OPER-C-07	<p>A management directed assessment of the ETF's Conduct of Operations performance was conducted from January 22, 2018 to February 01, 2018 as delineated in assessment plan, FY-2018-OPS-MD-0373 – Effluent Treatment Facility Conduct of Operations Performance Review.</p> <p>Finding:</p> <p>ETF-30-001, ETF-30-003, ETF-30-005 and ETF-30-52748 contain responsibilities for turnover that are not in alignment with TFC-OPS-OPER-C-07 requirements and are not cited as implementing documents in TFC-PLN-05.</p>
2/21/2018	WRPS-PER-2018-0426	Formal company recognition and accountability systems are not commonly utilized	<p>A management directed assessment of the ETF's Conduct of Operations performance was conducted from January 22, 2018 to February 01, 2018 as delineated in assessment plan, FY-2018-OPS-MD-0373 – Effluent Treatment Facility Conduct of Operations Performance Review.</p> <p>Observation:</p> <p>Formal company recognition and accountability systems are not commonly utilized as a management tool to improve performance.</p>

2/21/2018	WRPS- PER- 2018- 0439	Contaminated tumbleweed fragments were discovered	<p>During the performance of a Scheduled Radiation Survey Task Description (LE-W098) at LERF, contaminated tumbleweed fragments were discovered.</p> <p>Total Contamination of:</p> <p>East side of Basin 44 posted Contamination Area:</p> <p>Location # 1: 82,650 dpm/100 cm2 Beta-Gamma and &lt;500 dpm/100 cm2 Alpha,</p> <p>Outside of the East side of the LERF Perimeter fence (Non-Rad Area):</p> <p>Location # 2: 62,200 dpm/100 cm2 Beta-Gamma and &lt;500 dpm/100 cm2 Alpha</p> <p>No removable contamination was detected. The tumbleweed fragments were properly disposed of.</p> <p>Survey results are documented in Survey Simple on survey # LE-1800368</p>
2/21/2018	WRPS- PER- 2018- 0293	241-S-107 LOW readings	<p>OSD-T-151-00031 requires quarterly level monitoring for tank 241-S-107 using the LOW as the primary level monitoring device. No other monitoring device is specified by OSD-31.</p> <p>The last "good" LOW level monitoring reading was taken on October 17, of 2017. During the field work to obtain a 1st Quarter 2018 reading the LOW was found to be contaminated. The results were noted on radiological survey report numbers are WTP-1800149. The initial contamination survey results were noted in PER-2018-0288 indicating a breach in the LOW.</p> <p>A 2nd well swab is needed to confirm the initial contamination at 241-S-107 Liquid Observation Well (LOW). This is noted in TO-040-333, Section 5.12.6 to conclude that the LOW is no longer functional as a level monitoring device.</p> <p>An S-107 in-tank video inspection is tentatively planned for later in February 2018.</p>
2/21/2018	WRPS- PER- 2018- 0440	Front Windshield shattered on Gator near BX Farm	<p>Front Windshield shattered on Gator near BX Farm as NCO was in transit. Terrain was relatively smooth and -5/8's gravel. Not sure of cause at this time, no injuries but individual was transported to HPMC as a precautionary action.</p> <p>2nd Concern is to do extent of condition inspection on similar ATV's Utility Vehicles.</p>

2/21/2018	WRPS- PER- 2018- 0441	On 02/20/18 I performed a walk your spaces MOP on the A Complex.	On 02/20/18 I performed a walk your spaces MOP on the A Complex. Due to the wind storm over the weekend, there are quite a few tumbleweeds built up both on the outer fence and inside the A complex. The AX entry / egress tent has several identified issues. 1. The pads prior to the stepoff pad stating "Before Stepping Here Remove Shoe Covers" is worn and faded and needs replaced. 2. Hardhats are being stored in the Contamination Area without proper controls for contamination prior to donning / doffing them for work activities. This issue has been previously documented in WRPS-PER-2018-0352 for the AY-2 change trailer. No other issues identified during the MOP.
2/21/2018	WRPS- PER- 2018- 0438	Emergency Preparedness conducted an ICP Limited Drill that included Tank Farm ERO	EP-PE 6 – Emergency Response Organization (ERO)  On January 24th, 2018 Emergency Preparedness conducted an ICP Limited Drill that included Tank Farm ERO personnel and a response to an explosive device in AP Farm (EM-PO-ICP-2018-01-01). During the course of the drill the evaluation team identified the following issue:  The (b)(6) that was assigned to participate in the drill is not usually assigned to that shift and was unfamiliar with the process to be called to the ICP. Due to this unfamiliarity she was late to report to the ICP. In future pre-drill briefs Drill Coordinators should ensure all players are aware of activation processes and have means of communication available to use. Also, responding to the ICP during an emergency is discussed in 35E006 Event Scene Setup and Response training. (b)(6) has not yet had the training but will be scheduled for it in the coming months.  (P/E 6.8 – ERO Activation)
2/21/2018	WRPS- PER- 2018- 0437	(b)(6) did not utilize the RLEP briefing guide	EP-PE 6 – Emergency Response Organization (ERO)  On January 24th, 2018 Emergency Preparedness conducted an ICP Limited Drill that included Tank Farm ERO personnel and a response to an explosive device in AP Farm (EM-PO-ICP-2018-01-01). During the course of the drill the evaluation team identified the following issue:  The use of checklists and procedures could be improved. (b)(6) did not utilize the RLEP briefing guide for his initial ICP briefing. (b)(6) retrieved his (b)(6) binder and took his RLEP 1.1 position specific checklist out of the binder. He left the binder in the ICP and didn't have the other procedures with him for the duration of the drill. Checklists and Procedures  (P/E 6.11 – ERO Activation)

2/21/2018	WRPS- PER- 2018- 0436	During the course of the drill conduct of operations processes could have been improved	<p>EP-PE 10 – Notification and Communication</p> <p>On January 24th, 2018 Emergency Preparedness conducted an ICP Limited Drill that included Tank Farm ERO personnel and a response to an explosive device in AP Farm (EM-PO-ICP-2018-01-01). During the course of the drill the evaluation team identified the following issue:</p> <p>During the course of the drill conduct of operations processes could have been improved. The use of "drill message" before and after electronic communication was not observed consistently. The use of three-way communication/repeat backs between players was also not consistently observed by controllers (P/E 10.15 - Communications)</p>
2/21/2018	WRPS- PER- 2018- 0443	Employee was performing pre-use inspections of the SCBA unit	<p>Employee was performing pre-use inspections of the SCBA unit. Prior to performing the blow down of the regulator, liquid was observed on the employees hand originating from the regulator. The employee placed the regulator back into the receiving bag and investigated the surrounding area. No other source of liquid was observed. The employee then preformed the blow down of the regulator still contained in the receiving bag to verify the liquid in fact originated from the regulator. After investigating the receiving bag liquid was discovered within the bag. Approximately 1 ounce of liquid was observed.</p>
2/21/2018	WRPS- PER- 2018- 0442	On 2-20-18, [redacted] arrived at ETF to work 3 HVAC packages	<p>On 2-20-18, [redacted] arrived at ETF to work 3 HVAC packages. The packages were not with (b)(6) so they were not released by (b)(6). They brought the packages with them that morning all bundled into the same manila folder. The ETF (b)(6) and (b)(6) who would help them and then released 3 work packages for [redacted] on the ETF Daily Release Sheet and in the packages (4R-110569/P MO727 HVAC, 4R-110590/P 225E HVAC, and 4R-110571/P 225W HVAC). None of the packages were in Rad Zones but the 225W HVAC package was for TEDF Pump Station #1 which is in the PFP control zone. There were no restrictions on Tuesday for that control zone that day other than contacting the PFP Shift office prior to and after leaving the zone. The packages all listed 8-criteria checklists but these were only needed if the units failed the PM and repairs were needed and this turned out to NOT be the case with any of them. The crew completed the work and returned to their shop.</p> <p>On 2/21/18 10:30, two [redacted] employees arrived at ETF to resolve a discrepancy in the work package paperwork. The third package in the bundle was for 2025EC NOT 225W.</p>

2/21/2018	WRPS-PER-2018-0444	MOP/WSV AP Farm walk down.	The AN team Environmental Field Representative and I performed a walking survey of AP farm, walking the exterior of the fence line, looking for any potential environmental issues. The areas of AP farm inside the fence line appeared clean, orderly, and no environmental issues were noted. The areas outside the AP farm fence were also in good condition, with one exception. On the south side of AP farm, next to 255-AP, we noted a generator which appeared to have a recent diesel spill underneath on the gravel. Two catch pans had been placed under the generator and on top of the spill area. Upon contacting the Environmental On-Call Representative, he indicated the Central Shift Manager was not aware of the issue and that the spill was not logged in the Environmental Spill Log. This indicates the spill was not immediately reported to Environmental On-Call as required by TFC-ESHQ-ENV_FS-C-01.
2/21/2018	WRPS-PER-2018-0446	MOP/WSV Environmental Management Policy was not on website	It was noted that the most recent revision of the Environmental Management Policy was not yet available to the public on the WRPS external website. The publish date on Rev. 3 of the WRPS Environmental Management Policy was 01/09/18.
2/22/2018	WRPS-PER-2018-0449	Debris in AY101 Annulus	While shooting video in the AY101 annulus on 2/20/2018, it was apparent that this annulus has far more debris on the bottom than the normal amount for a DST annulus. Although the spot directly beneath the AY101-WSTA-LDT-153 annulus Enraf displacer was clean enough to recommend declaring it to be operable after calibration, nearby areas in the annulus have enough debris to question how well liquid would flow to the annulus Enrafs in the event of a leak.

2/22/2018	WRPS- PER- 2018- 0450	TFC-PLN-05, Incorrectly Exempts the 222-5 Laboratory from Control Area Activity Requiremen ts in DOE O 422.1	<p>TITLE of PER: TFC-PLN-05, Incorrectly Exempts the 222-5 Laboratory From Control Area Activity Requirements In DOE O422.1</p> <p>Title: Observed 222-5 219-5 Tank 102 to SY-101 Transfer</p> <p>Summary: The FR made observations inside the 219-5 operating gallery during the start of the 222-5 219-5 Tank 102 to SY-101 Transfer that included, exercising test buttons for the sump leak detection system, stopping the tank agitator pump, manipulating valves and switches, along with LOTO removal/installation.</p> <p>Inside the operating gallery were the 222-5 FWS, 222-5 Engineer and four Operators to support alarm testing and valve positioning. Transfer OEs were in the gallery intermittently to support the LOTO removal/installation. Based on observations made by the FR the operating gallery is used as a control area during a waste transfer, in accordance with the definition of "Control Area" per DOE O 422.1 (35781-TF-F01).</p> <p>The FR Observed effective 3-way communication during the use of the ATS-LO-100-177, continuous use procedure. The Operator responsible for reading the procedure was clear and concise and confirmed repeat backs were correct prior to the other Operators performing the steps within the procedure. In addition, prior to startup of the transfer, the Operator reading the procedure reviewed the steps with the other operators to shut down the transfer in the event a shutdown criteria was realized (35781-TF-S01).</p> <p>Procedure ATS-LO-100-177 Section 6.1.32 and 6.1.33 are required to be performed simultaneously. Two switches are rotated counterclockwise at the same time to achieve correct transfer configuration. Both switches have Close and Open indicator lights. Both steps indicate that the switches should be held until the OPEN light for Transfer TK-102 to SY Tank Farms is lit. During performance of these steps the FR observed at the time the switches were released the Transfer TK-102 to SY Tank Farms "Open" indicator light was lit. Within short duration, a second or two after releasing the switches, the OPEN light for Transfer TK-102 to SY Tank Farms turned off.</p> <p>A second Operator standing adjacent to the operator performing the simultaneous switch positioning operation quickly noticed the change in indicator light status and immediately took action and operated the switches until the Transfer TK-102 to SY Tank Farms "open" indicator light remained lit. The FR received clarification that the operator performing the initial rotation of the switches was a trainee and the second operator who intervened when the light went off was the qualified operator providing supervision of the trainee. An operator requested that the 222-5 Engineer note the discrepancy. Operations failed to stop work and notify facility management when procedure ATS-LO-100-177 could not be executed as written (35781-TF-02).</p> <p>During the Post Job brief when the Production Ops OE asked if any difficulties were identified that warranted a procedure change the room remained quiet until the FR prompted the discussion asking that the performance of steps 6.1.32 and 6.1.33 be discussed. Operations stated that the switches were operated in accordance with the procedure. Engineering stated that a change would be made to instruct the Operator to hold the switches for 15 seconds to allow for ample time for the pump to engage.</p>
2/22/2018	WRPS- PER- 2018- 0451	Operations Failed to Stop Work and notify Facility Managemen t when procedure ATS-LO-100- 177 could not be executed as written	<p>TITLE of PER: Operations Failed to Stop Work and Notify Facility Management When Procedure ATS-LO-100-177 Could Not Be Executed as Written</p> <p>Title: Observed 222-5 219-5 Tank 102 to SY-101 Transfer</p> <p>Summary: The FR made observations inside the 219-5 operating gallery during the start of the 222-5 219-5 Tank 102 to SY-101 Transfer that included, exercising test buttons for the sump leak detection system, stopping the tank agitator pump, manipulating valves and switches, along with LOTO removal/installation.</p> <p>Inside the operating gallery were the 222-5 FWS, 222-5 Engineer and four Operators to support alarm testing and valve positioning. Transfer OEs were in the gallery intermittently to support the LOTO removal/installation. Based on observations made by the FR the operating gallery is used as a control area during a waste transfer, in accordance with the definition of "Control Area" per DOE O 422.1 (35781-TF-F01).</p> <p>The FR Observed effective 3-way communication during the use of the ATS-LO-100-177, continuous use procedure. The Operator responsible for reading the procedure was clear and concise and confirmed repeat backs were correct prior to the other Operators performing the steps within the procedure. In addition, prior to startup of the transfer, the Operator reading the procedure reviewed the steps with the other operators to shut down the transfer in the event a shutdown criteria was realized (35781-TF-S01).</p> <p>Procedure ATS-LO-100-177 Section 6.1.32 and 6.1.33 are required to be performed simultaneously. Two switches are rotated counterclockwise at the same time to achieve correct transfer configuration. Both switches have Close and Open indicator lights. Both steps indicate that the switches should be held until the OPEN light for Transfer TK-102 to SY Tank Farms is lit. During performance of these steps the FR observed at the time the switches were released the Transfer TK-102 to SY Tank Farms "Open" indicator light was lit. Within short duration, a second or two after releasing the switches, the OPEN light for Transfer TK-102 to SY Tank Farms turned off.</p> <p>A second Operator standing adjacent to the operator performing the simultaneous switch positioning operation quickly noticed the change in indicator light status and immediately took action and operated the switches until the Transfer TK-102 to SY Tank Farms "open" indicator light remained lit. The FR received clarification that the operator performing the initial rotation of the switches was a trainee and the second operator who intervened when the light went off was the qualified operator providing supervision of the trainee. An operator requested that the 222-5 Engineer note the discrepancy. Operations failed to stop work and notify facility management when procedure ATS-LO-100-177 could not be executed as written (35781-TF-02).</p> <p>During the Post Job brief when the Production Ops OE asked if any difficulties were identified that warranted a procedure change the room remained quiet until the FR prompted the discussion asking that the performance of steps 6.1.32 and 6.1.33 be discussed. Operations stated that the switches were operated in accordance with the procedure. Engineering stated that a change would be made to instruct the Operator to hold the switches for 15 seconds to allow for ample time for the pump to engage.</p>
2/22/2018	WRPS- PER- 2018- 0452	Laboratory Transfer Procedure cannot be performed as written	<p>TITLE of PER: Laboratory Transfer Procedure Cannot Be Performed As Written</p> <p>Title: Performed Oversight of Transfer From 219-5 to SY-101</p> <p>Summary: Performed Oversight of Transfer From 219-5 to SY-101 on 02/08/18.</p> <p>-----</p> <p>Issue Type: Finding (Level 3) Significance Level: 2</p> <p>Statement: Laboratory Transfer Procedure Cannot Be Performed As Written</p> <p>Discussion: The FR noted that ATS-LO-100-177, Revision N-3, 222-5 Laboratory Transfer 219-5 Tank 102 Liquid Waste to Tank Farms, Pipeline, cannot be performed as written. Specifically, following the sequence written in steps 6.1.32 and 6.1.33 would result in valves not being in their proper position to start the WT-P-1 pump.</p> <p>A note states "Steps 6.1.32 and 6.1.33 are performed simultaneously." Step 6.1.32.1 has operators move a valve switch to the close position, and the next step, step 6.1.32.2, has operators hold the switch until the desired position indication is achieved. Steps 6.1.33.1 and 6.1.33.2 have similar wording, except for a different valve.</p> <p>Performing operations in the sequence specified would result in an operator moving the valve switch to the desired position, then releasing the switch, making the operator unable to comply with the next step to then hold the switch. This is an error trap that can easily be avoided by combining the two steps (i.e. MOVE AND HOLD switch "XX-XX-XX" to CLOSE until "XX" light is LIT).</p> <p>Requirements: TFC-PLN-05, Conduct of Operations Implementation Plan, Revision F-6, Attachment A, Requirement 2.p (3), states, "Procedure content, including consistent format and use of terms (e.g. prerequisites, warnings, cautions, notes, hold points, etc.), detail sufficient for accomplishing the operation, technically accurate procedures capable of performance as written, and procedure conformance with the facility design and manufacturer documentation." Detailed Attribute h, states, "Procedure language is clear, definitions are explained, and detail is appropriate for the operators' skill, experience, and training."</p>

2/22/2018	WRPS- PER- 2018- 0453	219-S Operating Gallery human factors/hum an performanc e consideratio ns can be improved	<p>TITLE of PER: 219-S Operating Gallery Human Factors / Human Performance Considerations Can Be Improved</p> <p>Title: Performed Oversight of Transfer From 219-S to SY-101 Summary: Performed Oversight of Transfer From 219-S to SY-101 on 02/08/18.</p> <hr/> <p>Issue Type: OFI (Opportunity for Improvement) Significance Level: 2 Statement: 219-S Operating Gallery Human Factors / Human Performance Considerations Can Be Improved</p> <p>Discussion: While performing a walkdown of the 219-S operating gallery, the FR recognized several potential human factors and human performance improvements. The switches that operate motor-operated valves 219S-HV-305 and CAHV-P1 are located on the same panel vertically from one another. For valve HV-305, the top switch, the positions from left to right read "CLOSE", "AUTO", and "OPEN" with position indicating lights that read from left to right "CLOSED" and "OPEN". For valve HV-P1, the bottom switch, this configuration is the exact opposite: the positions from left to right read "OPEN", "AUTO", and "CLOSE" with position indicating lights that read from left to right "OPEN" and "CLOSED". The intent of this configuration is for the switches to be operated simultaneously in the counterclockwise direction, resulting in HV-305 being closed and HV-P1 being open. Two-handed operation of different components is a human performance error precursor, and having a non-standard switch and position indication configuration is a human factors design that is likely to cause confusion. An improvement would be to have both switches and indicating lights in a consistent configuration, and two have the switches spaced apart to allow two operators to position the switches (or eliminate the simultaneous switching altogether).</p> <p>Additionally, the FR noted that the 219-S operating gallery sump leak/level detector panels each indicate three distinct sump levels and the three distinct circuits. Each panel has three indicating lights organized vertically that indicate sump high, medium, or low level, from top to bottom. On the left of each indicating light is a "TEST 1" pushbutton, and on the right is a "TEST 2" pushbutton. Having multiple lights and pushbuttons on a single panel with no visual distinction is a human factors design that is likely to lead to confusion. The leak/level detector panels could be improved with the use of color coded boxes around the switches and indications for each circuit (i.e. the high level light and switches are grouped within a red box, the medium are grouped within a yellow box, and low within a green box).</p>
2/22/2018	WRPS- PER- 2018- 0454	219-S Operating Gallery components labels do not adhere to labeling requirements	<p>TITLE of PER: 219-S Operating Gallery Component Labels Do Not Adhere to Labeling Requirements</p> <p>Issue Type: Finding (Level 3) Significance Level: 2 Statement: 219-S Operating Gallery Component Labels Do Not Adhere to Labeling Requirements</p> <p>Discussion: While performing a walkdown of the 219-S operating gallery, the FR noted several labels that failed to adhere to labeling requirements. The switch that operates motor-operated valve CA-HV-P1 which supplies air to the WT-P-1 pump has a label with the nomenclature "TRANSFER TK-102 TO SY TANK FARMS" and does not have a unique identification number. The label is ambiguous as to which component the switch actually operates, and does not have a unique identifier. Upon interviewing chem techs and performing a walkdown with the techs, the FR determined that the techs understood that operating two switches simultaneously positioned valve CA-HV-P1 but were unsure which switch actually controls the valve.</p> <p>Additionally, the FR noted that each of the 219-S operating gallery sump leak/level detector panels have pushbuttons with identical nomenclature and no unique identification number. Specifically, each panel has three "TEST 1" pushbuttons and three "TEST 2" pushbuttons that do not have unique identifiers. Without specific nomenclature and a unique identifier, it is unclear what components the pushbuttons operate. Component labels with ambiguous nomenclature and no unique identification number have the potential to cause mispositions that could lead to personnel injury or equipment damage.</p> <p>Requirements: TFC-PLN-05, Conduct of Operations Implementation Plan, Revision F-6, Attachment A, Requirement 2.r(1), requires that components are labeled.</p> <p>Detailed Attribute a. specifies that switches are required to be labeled. Requirement 2.r(2) states, "Label information that uniquely identifies components and is consistent with regulations, standards, and facility documents." Detailed Attribute b. states, "Label nomenclature, abbreviations, and identification codes are standardized and included in operator training." Detailed Attribute c. requires labeled components to have unique identification numbers.</p>
2/22/2018	WRPS- PER- 2018- 0455	e-Log PII injury information	<p>TITLE of PER: WPRS Should Evaluate Log Keeping Requirements for Illness and Injury</p> <p>Title: Reviewed Narrative Log Practices for Injury Recording Summary: While following up from a fact finding for EIR-2018-008, the FR noted that the narrative log entries on illness and injuries contain specifics of personnel names and the injuries they received. A log search of the last year showed that the majority of illness and injury log entries contained such details, while a minority contained more generic reports that identified an illness or injury was reported, without specifics as to the person's name and details of the injury.</p> <p>The FR followed up with operations management out of concerns about access to PII now that the narrative logs have transitioned from paper form under the control of the shift manager and area managers to an electronic format reviewable online. Operations informed the FR that out of these concerns they had already restricted access to the narrative logs to those requiring the ability to review (shift managers, area managers, and FRs). In addition there is a request, currently in backlog, to develop and implement the ability for e-logs to automatically redact such OUD information.</p> <p>However, it is unclear to the FR the value added by including the PII in the narrative logs in the first place. While most of the e-log entries contained the specific detail, some managers made entries that sufficiently communicated the events without unnecessarily releasing private information. The opportunity exists for operations to evaluate the exact level of detail that is needed in the narrative logs, and perhaps significantly protect from the risk of leaking personally identifiable information (PII).</p> <hr/> <p>Issue Type: OFI (Opportunity for Improvement) Significance Level: 1 Statement: 35807-TF-002 – WPRS Should Evaluate Log Keeping Requirements for Illness and Injury (Scrabbeck)</p> <p>Discussion: While making narrative log entries for personnel illness and injury, there is significant variation in how these entries are made. Most entries reviewed by the FR contain specific identifying information of the individual affected and the nature of their illness or injury. While some measures have been taken to restrict access to e-logs and to request redaction of OUD information, it is not clear that there is value added by recording the information in such specific detail. An opportunity exists for WPRS to significantly reduce the risk of personally identifiable information (PII) exposure by evaluating to what detail injury and illness information needs to be recorded in the electronic narrative logs, and to implement any appropriate changes.</p> <p>REF: TOD Weekly 2-12-18; B Scrabbeck; OFI; OA 35829</p>

2/22/2018	WRPS- PER- 2018- 0458	Transportation of rad material	transportation of rad material with out appropriate shipment papers or shipper from RMA's to RMA-005 and RMA-009
2/22/2018	WRPS- PER- 2018- 0456	Engineering Review or Evaluation AZ Farmmeta data identification numbering	While adding meta-data to Smartplant on essential drawings for AZ Farm, it was identified that the AZ Farm Leak Detection Pits AZ101 and AZ102 do not have unique structure location numbers as do other tank farms with leak detection pits. This has caused an issue with the temperature element equipment identification numbers for the waste storage tank and the leak detection pits to appear to be duplicated as seen on H-14-020507-01 revision 15 zones A4 and A7. Further investigation determined that ECN-655291, which renumbered the temperature elements, was incorporated incorrectly possibly due to poor quality of the images. However, the issue with the Leak Detection Pits structure location numbers has no explanation. Tank farms system P&ID structure legends drawings H-14-020000-01 and 02 also shows the discrepancies between the leak detection pit structure location numbers between tank farms AN, AP, AW, AY, SY and AZ farm. In addition, the AY and AZ Farm temperature element scanning instrumentation installation drawing H-2-93375-04 does not account for the leak detection pit temperature element TE-AY102A -028.
2/22/2018	WRPS- PER- 2018- 0459	222-S Tunnel Lights missing parts and/or not fully assembled	<p>While supporting work in the "tunnels" of 2225 Laboratory I made observations regarding "jelly jar" light fixtures. More than one were missing parts (ie. Glass encasements, protective metal cages). UL listings are void if the light fixture are missing parts and/or not fully assembled. Missing parts may expose conductors. Oversized CFL bulbs prevented jelly jar to be completely screwed on. Different types of light bulbs were in use (incandescent, CFL, LED). Some studies have concluded that mixing bulb types on same circuit shortens bulb life. SEE ATT. for Photos</p> <p>(b)(6) I talked to, claim they have expressed the issues "UP the chain" but it gets little attention. I'm sure this issue isn't exclusive to the 2225 tunnels and should be reviewed where Jelly Jar light fixtures are used.</p> <p>Why putting LEDs and incandescent bulbs on the same circuit is not recommended This entry was posted on August 5, 2011 by SimplyLed.</p> <p>LEDs are now the light of choice in many households, and with good reason. More cost-effective than incandescents, they're also kinder to the planet, using far less energy while giving superior brightness. But as long as people still possess traditional light bulbs, there will always be a temptation to combine LEDs and incandescent bulbs on the same circuit. While this is technically possible, it is ill-advised for a number of reasons. LEDs consume less power than incandescent bulbs. A typical incandescent bulb draws 60 watts while a GU10 LED, for example, uses only 3. So it's no surprise running both on one circuit will impact on performance. The incandescent bulb will draw more power, causing the LED to flicker and fade long before its time. This defeats the object of using energy-efficient lights in the first place!</p> <p>And it's not just the lights themselves you need to worry about. If you attach incandescent lamps to an LED driver, you're likely to wreck the driver. In terms of safety, it is best not to mix and match lights in this way. If rigged up unconventionally, a light could blow and cause a fire. The only truly safe way to mix incandescent and LED lights is to lay two separate circuits. Better still, replace all your filament-based bulbs with LEDs. Despite an initial outlay, you will soon recoup the costs. And as LEDs continue to gain in popularity and counties phase out traditional filament based bulbs, it's the incandescents which will be flickering and fading in the real struggle for power.</p>

2/22/2018	WRPS- PER- 2018- 0461	242-A Engineering Review or Evaluation SCR and SRS	<p>This PER is raised in accordance with TFC-ENG-DESIGN-D-12.1 (section 4.3.2.5 Final Approval of SCR Changes) to track release of affected documentation. In this case, it is to ensure that RPP-36610 is updated with the relevant requirements data from RPP-RPT-60580 after it is released. Explanation below.</p> <p>RPP-SCR-60459 is a software change request (SCR) to enable communications between the modified 242-A Ammonia Analyzer and the Tank Farms Monitoring &amp; Control System (TFMCS). The software was deployed and tested in December 2017 against a work order. Project turnover is today, requiring closeout of both the SCR and the work order.</p> <p>The SCR was subject to closure review today by the Plant Installed Change Control Board. It was noted that the SCR stated:</p> <p>"The preliminary requirements for initial deployment are listed below. When the requirements are finalized per RPP-RPT-60580, Chemical Vapor Source Monitor Functional &amp; Operational Requirement Document (FRD) the software will be updated and the updated software deployed."</p> <p>This means that the RPP-36610, TFMCS Software Requirements Specification (SRS), could not be formally revised to capture the requirements for the ammonia monitor modification, because the source/basis document RPP-RPT-60580 is not yet released (it is in progress within the current Vapors Stack Monitors project). Revision to SRS will be necessary in the future when FRD released.</p>
2/22/2018	WRPS- PER- 2018- 0462	HV-EA1-5 in the AMU room oil leak	<p>Discovered what appears to be oil on the bottom of the airline to HV-EA1-5 in the AMU room. PER written for tracking purposes.</p>
2/22/2018	WRPS- PER- 2018- 0463	C Farm Crane placement	<p>During an engineering walk down of the crane placement for WD#377415 the 80 ton crane was found to not be placed in accordance with the signed route map. The out rigger was placed too close to the C-101 pump pit. Also there were concerns with the placement of cribbing underneath the outrigger. A separate outrigger was placed so that some of its weight was on a yellow jacket. Photos and route map are attached to this PER.</p> <p>There are no safety concerns as the crane currently sits unloaded; however, it should be repositioned per the route map prior to picking a load. The central Shift office was contacted and the work package was suspended. Suspension of the work package will stop this package. As long as the crane remains unloaded it will not damage tank farm structures.</p>

2/22/2018	WRPS- PER- 2018- 0465	RED strobe light on top of the K1-ENCL-400 has not cleared	The RED strobe light on top of the K1-ENCL-400 has not cleared out even after re-setting it.
2/24/2018	WRPS- PER- 2018- 0466	AP108-EDS-DS-125	Production Ops NCO performing routines in AP Farm on 2/23/18 observed that the AP108-EDS-DS-125 disconnect switch for the AP-08A pump was in the off position. The NCO, also involved in the AP-108 to AW-106 Transfer schedule to start on 2/24/18 questioned this position and notified the transfer OE who identified that this was not in the correct position per step 5.2.4 of TO-230-002 "Transfer From 241-AP-108 to 241-AW-106" which had already been performed. Notification was made to Transfer Execution Manager, CSM and this PER submitted. Path forward to correct the disconnect switch position is to re-perform section 5.2 as directed by section 5.4 of TO-230-002.
2/24/2018	WRPS- PER- 2018- 0467	ETF Level Switch issue	While Evaporator was in "RUN" mode, LS-60i-136 would not clear. With Instrument Tech adjustments to sensitivity range, it was determined that level switch LS-60i-136 needs replaced.

2/24/2018	WRPS- PER- 2018- 0468	Auxiliary Oil pump 60I-P- 7	Auxiliary Oil pump 60I-P-7 was operating noisy (grinding/growling harmonic sound).
2/25/2018	WRPS- PER- 2018- 0469	Design Authority (DA) designations in SPF had been modified apparently without the knowledge and/or permission	<p>It came to the attention of Retrieval Engineering that the Design Authority (DA) designations in SPF had been modified apparently without the knowledge and/or permission of the assigned DA's.</p> <p>To check on this purported condition, a SPF Database query was performed on ONE DA (Waste Transfer System...)</p> <p>Attached is the result of this query, which shows a number of drawings that belong to Retrieval DA's, but per this listing now show as the responsibility of the Waste Transfer System DA. [See yellow highlighted items.]</p> <p>The manager of the Design Engineering group was contacted regarding this, and he indicated that he was unaware of how this occurred, but if this is the case, a PER should be written and the cause identified and corrected.</p>
2/25/2018	WRPS- PER- 2018- 0470	SCBA equipment odor	<p>9111 reported a chemical type (wescodyne) odor from their SCBA coupled with potential symptoms. 911 evaluated the individual and released to return to work.</p>

2/26/2018	WRPS- PER- 2018- 0471	AP108 to AW106 MBD Reset	Performed MBD reset per TFC-ENG-CHEM-D-44 for the AP8 to AW6 waste transfer. See completed Checklist 9 of TO-230-002_A-0.
2/26/2018	WRPS- PER- 2018- 0473	A Farm VCZ Postings	Signage around A-farm needs to be appropriately posted with the most current revision of the VCZ warning signs. I initially noticed the condition of the signs around A-farm when I was performing a site walk down on January 10th. I spoke with Operations Management, and later received an email stating that the appropriate team area manager had been contacted. When I was performing another site walk down last week, February 21st, I noticed not all the signs had been updated. I would like for all the VCZ warning signs be updated, appropriately posted, and securely attached throughout A-Farm.
2/26/2018	WRPS- PER- 2018- 0474	LOTO boundary violation	While preparing to perform a filter change out on POR 127 in C-Farm, personnel were preparing to start the filter change when two (b)(6) were approx. 10 minutes behind the main group already in the farm. They proceeded to go up to the work area without contacting the FWS. While inside the area the area was posted as an ARA. This demarcation also identified a lock and tag boundary area as discussed in the pre-job. An employee noticed that the (b)(6). The FWS was notified of the (b)(6) in the control area and he ordered them to leave the control area.

2/26/2018	WRPS- PER- 2018- 0475	222-5 proper Environmental contract language for external analysis of environmen tal compliance samples	Some environmental permits require that sampling and analysis use regulatory approved methods (i.e. EPA, OSHA, and NIOSH). For various reasons there may be reasons why changes from the stated approved procedure may be desired. Reasons to modify the specified methods include issues related to radiological controls, equipment availability, better procedure available, etc.. The desire to modify a method would apply to both analysis on site at 222-5 and at external labs. When deviations to an approved procedure are desired, a process is needed to evaluate the proposed change and document the basis for the change. For methods used for Environmental compliance, approval for the deviation needs to include Quality Assurance and Environmental. Presently, the Environmental review of laboratory procedures focuses on waste disposal and may not involve an evaluation of deviations from the regulatory method. Contracts with outside analytical laboratories may not have provision for WRPS approval of any deviations from the regulatory approved methods.
2/26/2018	WRPS- PER- 2018- 0476	222-5 proper Environmental contract language for external analysis of environmen tal compliance samples	Some environmental permits require that sampling and analysis use regulatory approved methods (i.e. EPA, OSHA, and NIOSH). For various reasons there may be reasons why changes from the stated approved procedure may be desired. Reasons to modify the specified methods include issues related to radiological controls, equipment availability, better procedure available, etc.. The desire to modify a method would apply to both analysis on site at 222-5 and at external labs. When deviations to an approved procedure are desired, a process is needed to evaluate the proposed change and document the basis for the change. For methods used for Environmental compliance, approval for the deviation needs to include Quality Assurance and Environmental. Presently, the Environmental review of laboratory procedures focuses on waste disposal and may not involve an evaluation of deviations from the regulatory method. Contracts with outside analytical laboratories may not have provision for WRPS approval of any deviations from the regulatory approved methods.
2/26/2018	WRPS- PER- 2018- 0477	222-5 proper Environmental contract language for external analysis of environmen tal compliance samples	Some environmental permits require that sampling and analysis use regulatory approved methods (i.e. EPA, OSHA, and NIOSH). For various reasons there may be reasons why changes from the stated approved procedure may be desired. Reasons to modify the specified methods include issues related to radiological controls, equipment availability, better procedure available, etc.. The desire to modify a method would apply to both analysis on site at 222-5 and at external labs. When deviations to an approved procedure are desired, a process is needed to evaluate the proposed change and document the basis for the change. For methods used for Environmental compliance, approval for the deviation needs to include Quality Assurance and Environmental. Presently, the Environmental review of laboratory procedures focuses on waste disposal and may not involve an evaluation of deviations from the regulatory method. Contracts with outside analytical laboratories may not have provision for WRPS approval of any deviations from the regulatory approved methods.

2/26/2018	WRPS- PER- 2018- 0478	Property Management System Review	<p>The WRPS Property Management review was performed using the Self-Assessment approach focused on the ten outcome measures identified in the FAR 52.245-1 Property Clause. The review covered the major property management functions in reference to the FAR requirements and the existing WRPS Property Management System. Based on the review, the WRPS Property Management System in general meets the requirements, addresses the necessary controls, and is an acceptable system. There were several functions where existing processes are effective and provide necessary controls. There were five(5) findings in two areas-Subcontractor Control and Utilization. There were fourteen(14) Opportunities for Improvement identified in certain areas where additional process improvements, follow-up programs, and scheduled overights will enhance property accountability and controls. The review covered the following basic property management functions:</p> <ol style="list-style-type: none"> <li>1) Acquisition</li> <li>2) Receipt</li> <li>3) Records</li> <li>4) Physical Inventory</li> <li>5) Subcontractor Control</li> <li>6) Reports</li> <li>7) Relief of Stewardship</li> <li>8) Utilization</li> <li>9) Maintenance</li> <li>10) Property Closeout</li> </ol> <p>There details of the findings and opportunities for improvements are included, with recommendations, in the attached documents.</p>
2/26/2018	WRPS- PER- 2018- 0479	SX-115 Enraf Repair	<p>The SX-115 Enraf calibration associated PMID: WT-006476 has a "must be done by date" of 2/16/2018. This date was missed due to unforeseen field issues. The completed calibration is expected on 2/26/2018. Contacted ST Team Area Engineer requesting the completed work package data sheet providing the good level reading be forwarded to the SST TAPs.</p> <p>Recommend Trend Only</p>
2/26/2018	WRPS- PER- 2018- 0480	ETF Emergency Preparedness Siren Testing	<p>During Monthly Emergency Preparedness Siren testing, the 2025E Control Room phones (373-9000)(373-9500) did not receive any notification of testing to be conducted. This is a manned 24/7 control room and should be on the notification system.</p>

2/26/2018	WRPS- PER- 2018- 0481	AX Farm CA/RA Posting	While DOE was performing a walkdown of RMA-012 during AX-102 riser SB pump oil drain preparation, the FR noted that a portion of the work area was not posted as a CA/RA. The north and east sides of the work area were established with stacked concrete barriers approximately 4' high. Yellow and magenta rope with CA/RA signs were hung on the concrete barriers, except for approximately 8' of length in the northeast corner of the work area where no signs or rope were posted. The FR pointed the non-posted area out to HPTs, and confirmed the following day that HPTs posted the area as a CA/RA.
2/27/2018	WRPS- PER- 2018- 0483	ETF TEDF pump station 1 heat pump/AC	TEDF Pump Station #1 used to have a heat pump but after it failed. RES replaced it with an Air conditioning only unit. ( RATL # 12-SOE-010 ) RES needs to replace the Air conditioning unit with a heat pump that has an AUTO function like the one we have at TEDF Disposal. It is important to complete this action soon because CHPRC is planning to designate Pump station # 1 as a CA due to issues with D & D of P.F.P. facility which will make access to the facility much more difficult. This will allow control of the temperature at PS#1 without having to access the facility. I can prepare for the coming weather changes & set Heat pump to Auto mode to reduce any high temp alarms this summer that we receive in the ETF control room or any freezing conditions that might come next winter.
2/27/2018	WRPS- PER- 2018- 0484	ETF contaminati on tumbleweed by basin 44	<p>During the performance of a Scheduled Radiation Survey Task Description (LE-W098) at LERF, a contaminated tumbleweed fragment was discovered.</p> <p>Total Contamination of:</p> <p>East side of Basin 44 posted Contamination Area:</p> <p>Location # 1: 17,870 dpm/100 cm2 Beta-Gamma and &lt;500 dpm/100 cm2 Alpha.</p> <p>No removable contamination was detected. The tumbleweed fragment was properly disposed of.</p> <p>Survey results are documented in Survey Simple on survey # LE-1800406.</p>

2/27/2018	WRPS- PER- 2018- 0447	POR-127 Portable Exhauster unplanned shutdown.	Portable Exhauster POR126(296-P-049)experienced multiple unplanned shutdowns due to high differential presure across the HEPA filters.
2/27/2018	WRPS- PER- 2018- 0448	POR-127 unplanned shut down	Portable Exhauster POR127(296-P-050) experienced multiple unplanned shutdowns due to high differential presure across the HEPA filters.
2/27/2018	WRPS- PER- 2018- 0472	222-5 Switchboard ES-SWGR-4 Circuit Breaker #5 shall not be used	ECN-713263 describes a change to the electrical distribution system as, " Add 600A breaker to circuit 5 of switchboard 'ES-SWGR-4' that feeds manual transfer switch 'ES-MTS-002'." In contrast, the associated issued single-line drawing, H-2-74852 SH 005 Rev 04, does not show this change. The single-line drawings shows that a 600A breaker was added to circuit 5 of switchboard 'ES-SWGR-5', which feeds the manual transfer switch 'ES-MTS-002'.

2/27/2018	WRPS- PER- 2018- 0485	MOP/WSV training evaluations	<p>Performed a review of procedure TFC-BSM-TQ-MGT-P-07, Training Evaluations. There are several issues within the procedure and are summarized below. The procedure has been attached with comments identified for further reference. Course Evaluations: According to the procedure, a hardcopy of the Student Course Evaluation form, A-6006-978, is to be provided to students after completion of every class. This is not being done consistently among Training Specialists. Forms are available in all room but are not being handed out and sometimes there are only mentioned where they are located so students can go and get one if they want to fill it out. A walkthrough of 2752E classrooms identified that that all room except 2 had current forms available. One room did not have a holder so forms were put on the podium. The other room had a holder so a handful of forms from another room were placed into that holder. Students are directed per procedure to, "Provide instructor direct feedback or complete Student Course Evaluation form, A-6006-978 after completion of classroom training". Student may not be aware or are not being made aware that this is a procedure statement. The feedback data and student comments will be rolled up into a Course Evaluation Summary using form A-6006-979, according to P-07. This is not being done by many of the Training Specialists. In searching IDMS under evaluations folder, only a handful of courses contained current feedback summaries. Several courses that are required by many employees and taught regularly, do not have any student evaluation summary forms in records. Per procedure, Training Specialists are to "Administer a Level 2 Evaluation during a pilot or initial class and every 2 years during the periodic course review". I could only find one form that has been done during a two year review and there have been numerous courses go through their 2 year periodic review in addition there have been several pilots performed as well as 2 year periodic reviews. P-07 states to "Conduct Level 3 Evaluation as directed by the Training Manager". No level 3's have been directed by Training Management since 2015 and no form or direction on how to perform one is provided. Program Evaluation: The scope of the procedure is to evaluate training courses and programs. The scope is stated as follow: "This procedure describes and implements the process for the periodic and systematic evaluation of Tank Operations Contractor (TOC) training courses and programs as identified in DOE O 426.2; "Personnel Selection, Training; Qualification and Certification Requirements for DOE Nuclear Facilities"; DOE STD-1070-94; "Guidelines for Evaluation of Nuclear Facility Training Programs" and the Training Implementation Matrix" No mention is made of DOE-STD-3009 or TFC-PL-32 processes, however they are discussed in section 4.2 Program Evaluation. It is stated, "Assessments are focused on objectives and criteria to satisfy 426.2, DOE-STD-3009-94 and TFC-PLN-32". Program evaluation states that vendor provided training programs are also assessed. It is unclear as to what are vendor provided training programs, for example is that HAMMER courses, or those that are provided by private organizations, e.g. ASME, and whether there has been any evaluations performed. This may be addressed in the Vendor Training Procedure. If so, then this procedure should point to it.</p>
2/27/2018	WRPS- PER- 2018- 0486	AW Farm incorrect WIDS sign	<p>During a walk down of the postings and entrances to the AW tank farm, a WIDS sign in the 241-AW-271 Instrument Building was observed that reads, "UPR-200-E-134 Unplanned Release Site." A review of the WIDS database information concluded there are no known unplanned releases associated with the AW tank farm. Incorrectly identifying a tank farm as an unplanned release site could result in unnecessary work when planning for closure of the DST System.</p>
2/27/2018	WRPS- PER- 2018- 0445	241-AX RWP Void	<p>While performing excavation in 241-AX, north of AX-103, a small steel plate was uncovered about 12" under the soil. The steel plate was surveyed by HPT, then removed from the ground and placed in a drum. The remaining soil was surveyed and found to have transferability contamination of 110,000 dpm/100cm<sup>2</sup> Beta-Gamma (no alpha). Recognizing the level was above the void level of 100,000 dpm/100cm<sup>2</sup>, work was immediately halted and personnel evacuated. The Central Shift Office was notified of the condition and entered AOP-020. See RSR COR-1800504 for additional details.</p>

2/27/2018	WRPS-PER-2018-0464	Calibration Certificates and Certificates of Conformance errors	<p>Documentation (Calibration Certificates and Certificates of Conformance) provided by GD Environmental Supplies with delivered instruments were found to contain a number of errors and deficiencies. In addition to the errors, insufficient information was provided in the Calibration Certificates to support interpretation of the calibration results and to verify conformance to applicable requirements. The three delivered instruments did not have calibration tags to indicate the calibration status and establish traceability to calibration records.</p> <p>The instruments were procured by and delivered to Mid Columbia Engineering (MCE) as part of the WRPS contracted Enhanced Auto-Sampler (EAS) development project, and MCE will facilitate the required corrective actions with GD Environmental Supplies.</p> <p>This issue was identified as a result of supplier oversight quality surveillance, TF-18-QSR-039, Vapors – Review of GD Environmental Product Documentation.</p> <p>It is recommended this be entered as a Trend-only PER.</p>
2/27/2018	WRPS-PER-2018-0487	Fixatives use in contamination control	<p>TFC-ESHQ-RP_RWP-C-03, REV O-3, "ALARA Work Planning" discusses the use of fixatives as a method of contamination control and ensures specified fixatives have been evaluated and listed in RPP 11192, "Tank Farms Chemical Compatibility Evaluation". While this ensures that any products authorized for use as fixatives have been evaluated for chemical compatibility, there is no delineation of those products useful for fixing radioactive contamination in place and those that may not be helpful.</p> <p>Additional information: During review of AX-04C pit causal analysis and Event Investigation Report (EIR) for a lessons learned preparation, it was found that no approved fixative was used on the job. The work package list several chemical items, but none are designed as a fixative. The package uses the term "Fixative" throughout the work instructions. Discussions with radiological control personnel indicated that Simple Green is the "Fixative" that is routinely used. Simple Green is a cleaner/degreaser not a fixative. What this results in is actually increasing the mobility of contaminates through the cleaning action. As the material starts to dry out, it can add contaminates available for dispersion.</p> <p>RPP-11192, Tank Farms Chemical Compatibility List, does contain several materials that are designed as fixatives.</p> <p>Various work instructions contain provisions to allow/require the use of products as fixatives that have the potential to exacerbate the spread of contamination rather than capture as would be done by a true fixative product.</p> <p>As an example, ALARACT 06.2, "TANK FARM ALARACT DEMONSTRATION FOR PIT ACCESS" requires that:</p> <p>"Before the pit covers are removed, an approved fixative may be applied inside the pit and/or the pit may be decontaminated. These processes are generally performed through an access port. If there is no access port(s), the pit covers are raised and suspended to provide access. A radiological survey is performed, and/or fixative may be applied inside the pit. The pit covers are then removed when necessary to perform work inside the pit. With the pit covers off, additional decontamination activities may include the use of chemicals, peel and strip paints, water, or manual scrub brushes".</p> <p>Under current guidance, the use of "Simple Green" would be allowed as there is no distinction provided that this would be a product that could easily have the unintended consequence of making the volatility of the radioactive contamination worse rather than better.</p> <p>This lack of differentiation between product characteristics could lead toward a false sense of security of the workforce in thinking that the product is retaining the contamination when in fact it is having the opposite effect. This could be a contributor to previous issues with contamination and airborne when performing pit work.</p> <p>This situation presents no requirement non-compliance, however, it does represent an opportunity for process improvement.</p>
2/27/2018	WRPS-PER-2018-0488	MOP/WSV AX-101 Tank Farm BBI revision discrepancy	<p>During preparation for an Ecology Dangerous Waste inspection of the A and AX Tank Farms, utilizing the TWINS database to download copies of each tank's latest Derivation of Best-Basis Inventory, a revision discrepancy was found for the AX-101 tank's best-basis inventory. The RPP-RPT-58620, "Derivation of Best-Basis Inventory for Tank 241-AX-101 as of July 1 2015" file name in TWINS is Rev 01, but the actual document is Rev 00. According to the document history in Smart Plant, Rev 00 is the current version and Rev 01 is in development.</p>

2/27/2018	WRPS- PER- 2018- 0501	SCA Postings on the South Side of the LERF	SCA Postings on the South Side of the LERF Basins are hung using plastic tie wraps. This is not in compliance with TFC-ESHQ-RP_MON-C-18, Radiological Posting.
2/27/2018	WRPS- PER- 2018- 0503	AY-102 Settlement	The final requirements of the AY-102 settlement are complete as reported to WRPS by ORP Legal Counsel. There are many additional engineering and operational controls that were developed to support the settlement agreement. upon closure those items can now be removed from standard operation. Environmental has reviewed the settlement agreement and identified a number of procedures, documents, etc where changes are necessary or documents need to be made historical to ensure final closeout of items no longer required. Discussion have already taken place with WRPS Legal, AY Ops Team, Retrieval Team, Environmental and Engineering.
2/28/2018	WRPS- PER- 2018- 0504	222-S (b)(6) not following TFC-ESHQ-RP_MON-P-10 signing requirement for (b)(6)	Several instances of (b)(6) logs (b)(6) going back as far as May of 2017. The log is not reviewed by a supervisor until completed after a year's service. Missing (b)(6) initial and date (b)(6) for 7/18/17. Was marked as needing completion, but again, no supervisor review until record completed, which may be up to a year after instrument placed in service.  The routine task sign-off sheet is reviewed (non-record), but not necessarily the underlying legal record.

2/28/2018	WRPS-PER-2018-0506	222-S RCT reached across CA boundary and (b)(6) in CA wiped nose with sleeve	(b)(6) on the outside of the CA boundary reached across the boundary rope and picked up a sample bottle. Another incident took place with (b)(6) on the inside of the CA, appropriately dressed in white anti contamination clothing, wiped his nose and face across the sleeve. MOP-2016-0624
2/28/2018	WRPS-PER-2018-0507	TFC-ESHQ-RP_ADM-P-09 appears to not have been kept up	TFC-ESHQ-RP_ADM-P-09 appears to not have been kept up when changes were made to TFC-ESHQ-RP_MON-C-27. P-09 is for hand written surveys, C-27 is for electronic surveys. Hand written surveys are only written when electronic system is unavailable. This does not happen often. In any case, the procedure needs to be kept up to date.
2/28/2018	WRPS-PER-2018-0508	slipped into a status Quo mode of thinking	Currently we have slipped into a status Quo mode of thinking. I believe we should always challenge the norms and seek improvements where we can. Currently work control has a very strong process, but I believe we can make improvements if we are willing to try. I believe we should be able to avail level 3 packages to a greater extent than we are currently allowed by the procedure. Although "like for Like" is allowed, if there is any procedure associated with the work it is not. This seems to be a hindrance in my opinion. we currently have a procedure for torquing bolts, but we tend to always write that into the work instructions. we current attach RWP,WPC, and sample plans to work orders, these also provide instructions as well. Why can't a torquing procedure be allowed for a "Like for Like" changing out? Driving this type work to a level 1 seems like a waste of time. At ETF we are an Operating plant and as such the need for fast turn around from identification of issue to resolution can greatly affect schedule. This issue will branch out to the rest of production Operations as we get closer to feeds for WTP.

2/28/2018	WRPS- PER- 2018- 0509	Solutions to recognize employees for their years of service	An employee was celebrating 35 years in the company. Generally milestone service awards are sent to the manager and the manager may or may not present it front of the group to show appreciation for the employee's service. But outside of the work group no one knows. In the past, our company publications like Solutions used to highlight employee achievement. At minimum they would show pictures of the quarterly award breakfasts. Possibly the breakfasts have gone by the wayside due to cost. However, it seems like we could still publish notification in the Solutions to recognize employees for their years of service. I think this is a good morale builder. It also helps introduce our employees to others in the company that may or may not know them.
2/28/2018	WRPS- PER- 2018- 0362	Changes to AN-102, B-202, TX-110, and SX-102 Waste Group Classification	<p>During the annual revision to the waste group evaluation document, RPP-10006 (Rev. 15), the following changes to waste group classifications were identified:</p> <ul style="list-style-type: none"> <li>• 241-AN-102 waste group changes from B to C. <ul style="list-style-type: none"> <li>- Based on average of solids level measurements of 56.1 in. as reported in RPP-RPT-45764 Rev 6. Previous versions of RPP-10006 used a high value of 79.7 in. (zip cord measurement of 72.7 in. + 7 in. add-on).</li> </ul> </li> <li>• 241-B-202 waste group changes from C to B. <ul style="list-style-type: none"> <li>- A slight increase in the reported BBI volume caused this tank to go from C to B.</li> </ul> </li> <li>• 241-TX-110 waste group with 10,000 gal water add changes from C to B. <ul style="list-style-type: none"> <li>- An increase in the reported BBI solids level caused this tank to go from C to B with a 10,000 gal water addition.</li> </ul> </li> <li>• 241-SX-102 waste group changes from B to C. <ul style="list-style-type: none"> <li>- A decrease in the reported BBI interstitial liquid level caused this tank to go from B to C.</li> </ul> </li> </ul>
2/28/2018	WRPS- PER- 2018- 0502	work completed date was entered into Smartplant for an ECN prior to it being signed off as work complete by the design author	Recently, a work completed date was entered into Smartplant for an ECN prior to it being signed off as work complete by the design authority. The error was not caught by the drafter incorporating the ECN. As a result ECN-712795-R1 was incorporated on several drawings. The same thing happened with ECN-712473-R1 which is being worked separately.

2/28/2018	WRPS-PER-2018-0512	software critical error 774552 affecting Bentley's STAAD	Bentley Systems Inc. notified WRPS of software critical error 774552 affecting Bentley's STAAD.Pro design and analysis software. STAAD.Pro has been used by WRPS to analyze steel structures including TOC SSCs. This software critical error may produce non-conservative results when STAAD.Pro is used to analyze steel structures against code year 2010 or later of AISC 360.
2/28/2018	WRPS-PER-2018-0513	Evaluate procedure TFC-ENG-DESIGN-P-54	During preparation of MOP# WRPS-MOP-2018-0625 it was identified that procedure TFC-ENG-DESIGN-P-54 should be evaluated to determine if additional guidance is necessary to verify that the order of incorporation as noted in the ECN text and attachments be checked. Drawing incorporation errors documented in PER #s WRPS-PER-2017-1830 and WRPS-PER-2018-0118 may have been avoided if additional guidance was present in TFC-ENG-DESIGN-P-54. The intent of this PER is to determine if additional guidance in the subject procedure is necessary to prevent recurrence of this type of issue in the future.
2/28/2018	WRPS-PER-2018-0514	Review of TFC-ESHQ-S_IH-C-05	Review of TFC-ESHQ-S_IH-C-05 - Respiratory Protection and implementation of the RP Form special instructions. Special instructions included in most current RPFs are not relevant to communicating required RPE nor support communication of required RPE to issue station. The current special instruction verbiage should be reviewed and possibly removed. Instructions relevant to safety hazards associated with the use of RPE are addressed in C-05, sections 4.6, 4.13, 4.14, 4.15 which are more properly addressed in the work planning (JHA) process. This is an opportunity for improvement.

2/28/2018	WRPS- PER- 2018- 0515	Lead Shield Blanket Discovered To Be Contaminat ed	After a temporary Contamination Area inside RMA-012 was surveyed (COR-1800555) and down posted to a Radioactive Material Area, a lead shield blanket was discovered with removable contamination on accessible surfaces in excess of Table 2-2 limits. Table 2-2 limits for removable contamination are 1000 dpm/100 cm sq beta-gamma, and 20 dpm/100 cm sq alpha. Initial field survey results (COR-1800540) were 12,000 dpm/100 cm sq beta-gamma and 28 dpm/100 cm sq alpha. Subsequent analysis (CR-1800079) of smear media following a period of decay in an area with minimal background was 6330 dpm/100 cm sq beta-gamma and no detectable alpha. This occurred in RMA-012 in 200E Area, an area normally posted as a Radioactive Material Area (RMA) and permanently posted as Underground Radioactive Material Area (URMA).
2/28/2018	WRPS- PER- 2018- 0523	242-A SCR need corrections/ changes made in procedures	Engineering performs SCR's (software change request) many times over the course of the year. These changes can affect everything from Alarm Set Points to Alarm indication on the MCS. Electricians performing a PM (3-LDD-869) could not complete it because one of these SCR's changed some of the Locations ( Faceplates/Block) identified on data sheet. These changes did not identify what procedures or data sheets they will affect after this SCR is complete.
2/28/2018	WRPS- PER- 2018- 0524	Proper SCBA tracking sheet not used	(b)(6) personal for AY/AX were in non-compliance with procedure TO-020-028 Rev C-10. It was found they haven't been using the current site form SCBA BOTTLE TRACKING LOG (A-6007-419) in accordance with TO-020-028. Instead they have been using the old standing order OPS-17-005.

2/28/2018	WRPS- PER- 2018- 0525	Eyewash requirement by package	<p>Work package WO#381252 step 4.4 requires (ensure) an eye wash station with drench hose stage at the job. On 02/23/18 the work proceeded without the eye wash being staged. The eye wash station is a prerequisite for the safety of the workers in the field in case a contamination(rad or chemical) is encountered on the job.</p> <p>The other issue is that the work package prerequisites require an eye wash station be at the job location but the JHA is not marked for block 1 and 2.</p>
2/28/2018	WRPS- PER- 2018- 0526	Whole body count requirement for vendor work	<p>While a vendor was attempting to gain access to a radiological work area, it was determined that the vendor needed to obtain a TLD and a whole body count prior to performing hands on work. The vendor had previously obtained Radiological Worker II training. During the process of obtaining the TLD and whole body count, questions arose as to which whole body count was deemed adequate for the work. The RWP that the vendor was to perform the work requires a 10 minute whole body count. WRPS dosimetry Operations scheduled the vendor for a 3 minute whole body count as it was an unscheduled walk in. When the vendor ACED onto the RWP, they were cleared for access. Further investigation (discussions with WRPS RadCon Director and procedural reviews) revealed that a change to TFC-ESHQ-RP_DOS-C-04, Internal Dosimetry procedure, Note 1 for Table A-1 of Attachment A-Guidance for Assigning Bioassay Requirements in Radiological Work Permits states "a WB can substitute for a WC". 1. There is no actual definition for the "WB" used in Table 1 Notes in the Internal Dosimetry procedure. 2. ACES Role codes for 10 minute whole body count "WC" does not reflect that the "WB" role is an acceptable substitute. (WC is an acceptable substitute for WB).</p> <p>3. RWP form template (A-6003-902) only reflects a 10 minute whole body count. Discussions about RWP form template changes needed revealed that no changes would be made at this time as the new entry control system "Sentinel" will be replacing ACES in the near future. At that time, the distinction between WC and WB will be dropped to reflect a whole body count only with no count time requirement.</p>
2/28/2018	WRPS- PER- 2018- 0527	benefit routine maintenanc e	<p>During a routine preventative maintenance inspection of insulations (asbestos/non-asbestos), the inspectors had some difficulties finding some inspection items due to faded or nonexistent labels, and drawings with insufficient details for various Tank Farms. While performing a routine inspection in A/AX Farms, the inspectors noticed the effectiveness of utilizing drawings SK-2-400177 (Sheets 1-7). Using drawings SK-2-400177 as a guide for locating the inspection items helped the inspectors executing the tasks efficiently and reduced their time in the Tank Farm with SCBA. No insulation location drawings were found for the remainder of the Tank Farms in SmartPlant Foundation (SPF). Relabeling facilities/equipment and providing drawings similar to SK-2-400177 will benefit routine maintenance, operation and engineering for the remainder of TOC.</p>

2/28/2018	WRPS- PER- 2018- 0530	U-Farm Tumble Weeds	Tumbleweeds are becoming a nuisance to the point they are building up and covering Radiological signs and warning signs. They are stacked so high they are completely covering the exterior fence about 8 feet tall on the west side of U-farm.
2/28/2018	WRPS- PER- 2018- 0531	furan and substituted furans	Review of respirator cartridge testing data revealed a data anomaly. WRPS and PNNL personnel identified a data anomaly between two methods routinely utilized to sample for furan and substituted furans. Initial extent of condition revealed minimal impact as generally VOA and furan methods are run in parallel and the two methods together appear to be able to retain furan and substituted furan species adequately. This is an opportunity for improvement.
2/28/2018	WRPS- PER- 2018- 0532	NEC code issue for LERF basin transfer pump P43-4 installation	Questions came up on NEC code issue for LERF basin transfer pump P43-4 installation. On march 2nd 2017 the Authority having Jurisdiction(AHJ) and for the NEC code and Engineering walked the installation down and determine it was not a safety issue, but a code issue did exist. The AHJ gave a waiver of equivalency per NEC 90.4 to complete pump out of Basin 43 with an agreement to upgrade the installation by June 2017. This item was not tracked be completed before basin 43 startup.

2/28/2018	WRPS- PER- 2018- 0533	U-Farm and on the west side of exterior fence line	Performed a Walk Your Space MOP at U-Farm and on the west side of exterior fence line, there were some Radiological Signs that needs to be corrected. Some Radiological signs need to be added, pictures attached. Some signs can't be identified because of the tumbleweed issues. Also, some Radiological Signs are hanging by one clip and are damaged.
2/28/2018	WRPS- PER- 2018- 0534	Temp Mods MOP/WSV	While reviewing MT-50301, "Reestablish Instrument Air to AY102-WSTA-WFIT-122", it was identified that an ECN associated with the Modification Traveler, ECN-712715, "Reestablish instrument air to AY102-WSTA-WFIT-122 for real-time level" was a temporary modification. The temporary modification was "Modification work complete" on 4/30/2016. It was being tracked in the Temp Mods&Op Bypasses log # PO-17-001 and had been extended beyond the 180 days identified in section 4.3 of TFC-OPS-OPER-C-11. Operations had determined that the modification was still required; however, it was made a permanent modification the temporary modification was just extended. This particular modification is 653 days old. (See attached log record)A search was performed in SmartPlant for other Temporary Modification ECNs (TM ECNs) over 180 days old. 10 TM ECNs were found (see attached search). Of these 3 were found to still be installed and not converted into a permanent modification or returned to the original configuration:ECN-713235, "Submersible Pump SYstem for LERF Basin 43", mod installed 3/28/2017ECN-713255, "AW Farm Fence Relocation", mod installed 5/9/2017ECN-713259, "SY Farm Annulus ENRAF Communications", mod installed 3/28/2017
3/1/2018	WRPS- PER- 2018- 0535	Inadequate or no lighting in tank farms in 200 West.	Inadequate or no lighting in tank farms in 200 West. T-Farm: Power to change trailer and light by trailer. Lights are in the farm, but not operational. TY-Farm: Lights on poles, but don't know if they are operational. TX-Farm: Poles and lights in place. Not operational. SX-Farm: Lights on poles, but don't know if they are operational. U-Farm: Lights on poles reportedly not working. S-Farm: Farm is lighted, but parking lot has no lights SY-Farm has adequate lighting.

3/1/2018	WRPS-PER-2018-0489	TFC-PLN-10 includes a link to an old version of the Technical Basis document	TFC-PLN-10 includes a link to an old version of the Technical Basis document and needs to be updated with a link to the current Technical Basis document.
3/1/2018	WRPS-PER-2018-0490	The MOPATS assessment format is not consistent with the format described in assessment process flow sheet in TFC-ESHQ-AP-C-01	The MOPATS assessment format is not consistent with the format described in the assessment process flow sheet (figure 3) in TFC-ESHQ-AP-C-01, the assessment report template, or the assessment report instructions available on the assessment program webpage.
3/1/2018	WRPS-PER-2018-0491	No requirement to notify assessment team leaders that assessments are coming due	There isn't a requirement to send out notifications to remind assessment team leaders that assessments are coming due.

3/1/2018	WRPS- PER- 2018- 0492	A number of FY2017 specialty (required) assessments were not evaluated and assigned assessment scores	A number of FY2017 specialty (required) assessments were not evaluated and assigned assessment scores during the absence of a full time assessment program lead. TFC-ESHQ-AP-C-01 requires the assessment program lead to review Specialty (required) assessment reports and provide feedback using the assessment evaluation and feedback form, to the responsible manager, assessment team lead, and applicable line contractor assurance managers for future assessment and report improvements.
3/1/2018	WRPS- PER- 2018- 0493	FY2018-OPi-R-0199 was recorded in the assessment data base as completed in December, but was signed off as final in January	An assessment (FY2018-OPi-R-0199) was recorded in the assessment data base as completed in December, but was signed off as final in January.
3/1/2018	WRPS- PER- 2018- 0494	Process of evaluating completed assessments could be reviewed to ensure assessments are more self-critical	<p>The process of evaluating completed assessments could be reviewed to ensure assessments are more self-critical.</p> <ul style="list-style-type: none"> <li>- The evaluation form doesn't explain what the expectation of being self-critical is.</li> <li>- The assessment procedure could be clearer concerning what self-critical is.</li> <li>- The assessment directions available on the assessment program page could be clearer of what self-critical means.</li> <li>- The evidence that is considered self-critical, could be communicated during the assessment team leader qualification process.</li> </ul>

3/1/2018	WRPS-PER-2018-0495	Weekly Reminder Emails for MOPS.	MOPs weekly reminder email notifications have not been sent out on a weekly basis. TFC-ESHQ-AP-C-03 requires the assessment program lead send weekly MOP/WSV status reminders to applicable Level 0/1 and 2/3 Managers. (Managers have provided feedback that weekly reminders are too often)
3/1/2018	WRPS-PER-2018-0496	MOPATS should include a link to the MOPs users guide and CBT (training).	MOPATS should include a link to the MOPs users guide and CBT (training).
3/1/2018	WRPS-PER-2018-0498	No direction available that instructs assessment leads how to amend finalized assessments.	There isn't any direction available that instructs assessment leads how to amend finalized assessments.

3/1/2018	WRPS- PER- 2018- 0499	Required and Management Directed Assessments	There is confusion about what are required and management directed assessments. Consider consulting the DOE's Management and Independent Assessments Guide DOE G 414.1-1B, to see if assessment types could be better defined.
3/1/2018	WRPS- PER- 2018- 0536	PM Data Sheet Revisions Did not Follow Approved Process	<p>Procedure requirements not followed.</p> <p>During Post Review of work packages the following was found</p> <p>A technical change was made on 3 different work packages (297274, 297273, 297271) by engineering.</p> <p>The official released SPF PM data sheet was removed from the (Ready for Work) work packages by unknown sources and replaced by unknown sources with a new PM data sheet that was developed outside of SPF and inserted into the package. The new data sheets were not approved through the required SPF or work control process. These newly developed data sheets were made to appear as approved released documents and were outside of configuration control.</p> <p>The SPF approved PM data sheets are identified with revision control document numbers ensuring that the document has been approved for use.</p> <p>The changes to the work packages were documented on the work record 1-30-18. The work packages were not released for work until 2-13 and 2-15.</p> <p>The Technical Change was not documented and approved by the appropriate SME's as identified in procedure TFC-OPS-MAINT-C-01. Nor was the change processed in accordance with procedure TFC-OPS-MAINT-C-12.</p> <p>Copies of the identified documents attached.</p>
3/1/2018	WRPS- PER- 2018- 0538	CSE and STE Lapse in Qualification Training	<p>On Monday 2/26/18, the Cognizant System and Shift Technical Engineering Manager was notified that one of his engineers was delinquent in a Shift Technical Engineering (STE) qualification. This was observed in an assessment performed by the QA organization. Consulting the training database, we concluded that this was accurate, and that one other Cognizant System Engineer (CSE) was also delinquent in the CSE qualification card as well.</p> <p>The previous summer, both engineers had started the qualification renewal process, including interviews with engineering management. This process included interview questions from the qualification process to ensure understanding of engineering processes, checking to ensure that prerequisite qualifications were completed (this is documented in the employee's training records), and that they have retained sufficient procedure and facility knowledge to perform their job functions. However, unfortunately the paperwork generated at that time was set aside or lost in transit and was not submitted to the training department at that time.</p>

3/1/2018	WRPS-PER-2018-0541	TFLAN management	<p>I met with Design Authority (DA), and briefly discussed TFLAN management with P&amp;CS Eng. Level 3 managers. In the past couple of years, TFLAN have expanded significantly. Projects such as: TF Automation, Vapor Monitoring and Detection Systems, CVAP, TF Safety Programmable System (TFSPS), OSI-PL, and others like it, have expanded TFLAN by implementing DMZ, Wireless solution, VLANs, Firewalls, HLAN integration with TFLAN, Smart Devices connation to TFLAN and HLAN and etc. There have also been network integration including planned network tie-in between facilities such as: Evaporator, ETF and 2225 Lab MCS systems with TFLAN.</p> <p>I think there a need for a detail but integrated review of TFLAN expansion including all the key subcomponents (Firewalls, Servers, Controller and etc.) by P&amp;CS team members and MSA to ensure sound network engineering architecture, system monitoring, and configuration management have been implemented. This review should include but not limited to:</p> <ol style="list-style-type: none"> <li>1. Network system layout, available drawings and sketches</li> <li>2. HLAN and TFLAN integration and tie-in points</li> <li>3. Evaporator, ETF and 2225 Lab and TFLAN integration</li> <li>4. Smart Devices integration to HLAN and TFLAN</li> <li>5. TFLAN/HLAN DMZ review</li> <li>6. Available network monitoring, scanning, and detection tool</li> <li>7. Wireless integration with TFLAN and HLAN</li> <li>8. External network integration to TFLAN and HLAN (i.e. HOB0, GPS and etc.)</li> <li>9. Firewall configuration across these LAN's including Firewall parameter review</li> <li>10. Sever communication and protocols</li> </ol>
3/1/2018	WRPS-PER-2018-0542	242-A Evaporator Vessel Vent Exhauster	242-A Evaporator Vessel Vent Exhauster (296-A-22) experienced 5 unplanned shutdowns 2/25/2018 through 2/26/2018.
3/1/2018	WRPS-PER-2018-0540	PER (Test Server) e-mail notifications not turned off	PER (Test Server) sent e-mails to production users for Closed PERs stated the PERs had been Closed

3/1/2018	WRPS- PER- 2018- 0539	PER Software V4.06 was installed on 1/30/2018 without the necessary approvals for use	<p>The PER Software V4.06 was installed on 1/30/2018 without the necessary approvals for use. The current approvals in HISI for use are from 3/7/2017 for V4.05.01. The Software Configuration Management Plan (SCMP), RPP-PLAN-57928, Rev.00 for the PER system in Section 6.8 Scheduled Release Process specifies, "The WRPS PER Software Owner should provide ample time for the Software Review Approval Cycle to occur - the review cycle typically requires a minimum of 2 business days, and can depend on the version type (Minor, Emergency, Major) as entered into HISI." The software changes were implemented contrary to the SCMP.</p> <p>The software life cycle deliverables for V4.06 as specified in HISI with a 1/24/2018 date have either not been updated or are still working through the SPF workflow. The Software Management Plan (SMP), RPP-PLAN-57927, Rev. 01 is from 11/05/2014 for V4.03.01, the Software Test Report for PER, RPP-PLAN-62026, has not completed the workflow process in SPF, the document includes the test cases and the test results for the Affected Change Requests listed in HISI for the Minor Release, the Software Requirements Specification for PER, RPP-SPEC-62027, has not completed the workflow process in SPF, the document does contain the requirements for the Affected Changes.</p>
3/3/2018	WRPS- PER- 2018- 0544	Requiremen ts for Entry to Tank Farm for AOP-021 Response	<p>When conducting a table top drill on shift, requirements for entry into a tank farm to secure waste disturbing operations were discussed with drill participants. The following comments are submitted for evaluation for procedure improvements.:</p> <p>One participant noted that since "STOP waste disturbing activities..." is the first immediate action in AOP-021, waste recirculation could be stopped using the waste transfer RWP WTO-0492 without regard to the directions given for PPE and RWP requirements of step 3.2.1 contained in Section 3.2 Follow-On Actions. This interpretation is further bolstered by the note under section 3.0 which states "Actions in Section 3.0 can be performed in any logical order or concurrently as directed by the Central Shift Manager." This does not appear to be a conservative approach since TF-116 requires additional PPE for entry into farm if the ventilation shut down is due to a CAM alarm.</p> <p>The requirement to use a different RWP to enter a farm when ventilation is shut down was also discussed. TF-121 for use when ventilation shutdown is not due to a CAM alarm requires different ED settings for dose rate alarms and would require returning, resetting and reissuing EDs before entering farm. This could significantly delay stopping the waste transfer or restarting ventilation. This appears unnecessary since the ED settings for RWPs TF-102 (Tank Farm Routines) and WTO-0492 (Waste Transfers) are more conservative than TF-121. Further, ventilation shutdowns have not historically caused changes in radiation dose rates or contamination status in the farms. As such, increased radiological limits to respond to ventilation shut downs are not necessary and delaying immediate and/or recovery actions to change RWPs is not efficacious.</p> <p>Since "emergency situations" is not defined in the transfer procedures, various interpretations of what constitutes an emergency were discussed. Clarification should be provided to ensure that consistent and appropriate actions are taken when a shut down criterion of Table 1 is met.</p>
3/5/2018	WRPS- PER- 2018- 0545	Install a catch tray under boiler	<p>Install a catch tray under boiler for workers underneath in case of leaks of 200 degree Fahrenheit water.</p>

3/5/2018	WRPS- PER- 2018- 0546	Downspout on Southside of 2025E	Downspout on Southside of 2025E leaves a big water puddle that freezes. HPT's have to perform surveys in these areas and could accidentally walk on ice and fall.
3/5/2018	WRPS- PER- 2018- 0547	UV/OX System Odor Response	Employee responded to a leak on the UV/OX system from a ground fault. There was an odor present in the leak. The employee would like to have an IH available next time we start up to sniff the area in another leak occurs due to known mercury levels inside of system.
3/5/2018	WRPS- PER- 2018- 0548	Stanchions Needed	Stanchions need to be placed along side the rubber matting in the surge and verification berms to identify where the walkways are in inclement weather. Concrete is slippery when covered in snow.

3/5/2018	WRPS- PER- 2018- 0549	Stop Work for RPE Failure	Issued stop work for RPE failure that occurred Sunday 3/4/18. SCBA regulator failure.
3/5/2018	WRPS- PER- 2018- 0537	222-S Rad Survey not completed before working in fume hood	Contrary to section 6.1.1 of AT5-LO-161-003 and RWP 5-809 (Rev 010), work was performed in hood 1 of room 1GA prior to obtaining the required radiological surveys by HPT.
3/5/2018	WRPS- PER- 2018- 0510	Radios were unable to make contact with POC during an operational drill.	<p>On 2/21/2018, Production Operations AZ Team conducted an operational drill to evaluate the emergency radio channel that can be used to contact the Patrol Operations Center during an event. During the course of the drill, the evaluation team identified the following "Suggestion" which pertains to EP-Program Element 10 "Notifications and Communications".</p> <p>Radios were unable to make contact with POC during an operational drill. (P/E 10.14)</p> <p>Patrol/HFD indicated that a repeater was down in the area as a possible reason for the contact was not receiving a response from POC and that since the radios are not regularly used as a way to contact POC that POC may not have been monitoring the radio channel as closely as it should have been.</p>

3/5/2018	WRPS-PER-2018-0551	WRPS should refine and utilize its draft integrated schedule to drive overall organizational integration	<p>TITLE of PER: WRPS should refine and utilize its draft integrated schedule to drive overall organizational integration</p> <p>Scope: The vapors management program centers on three main objectives: 1. Manage the hazards 2. Conduct high-quality conduct of operations 3. Engage and fully support the workforce</p> <p>Based on information gathered and analyzed in the first phase (FY15-16) of vapors implementation and feedback and recommendations from multiple external assessments, a more comprehensive strategy to address vapors was developed to ensure all workers on the Hanford Central Plateau are safe—feel safe. To inform this strategy, the Comprehensive Vapor Action Plan (CVAP) was drafted and included eight key performance parameters (KPPs) important to the success of the vapor management program. As described in ORP Contracting Officer letter 17-TF-0015, dated March 1, 2017, these KPPs included:</p> <ol style="list-style-type: none"> <li>1. Establish a comprehensive vapor management communication plan, engagement processes, and effectiveness measurements.</li> <li>2. Maintain the Industrial Hygiene Chemical Vapor Technical Basis and Chemicals of Potential Concern (COPC). Institutionalize a disciplined and rigorous process for updates to include new scientific findings and enhanced understanding of potential exposures.</li> <li>3. Maintain Industrial Hygiene Program and institutionalize vapor program requirements, best practices and program parity, and complete necessary training to support full implementation at the beginning of FY 2018.</li> <li>4. Complete engineering control concept demonstrations for Strobic Tri-Stack and NUCON International Inc. thermal combustion in support of unrestricted work boundaries.</li> <li>5. Define unrestricted work boundaries and implement monitoring on active stack ventilation and unrestricted work boundaries in the A Area farms to provide defense in depth.</li> <li>6. Institutionalize a tank operations stewardship program that minimizes required tank farm personnel entries; and establishes parameters for locating ancillary personnel and offices.</li> <li>7. Provide options to promote the hierarchy of controls for chemical vapor respiratory protection beyond current use self-contained breathing apparatus.</li> <li>8. Support medical program enhancements in conjunction with responsible Hanford site organizations and establish update to WRPS process/procedures as required.</li> </ol> <p>This surveillance focused on KPP 5 for implementing monitoring on active stack ventilation and unrestricted work boundaries for defense in depth. Specifically, Washington River Protection Solutions (WRPS) is nearing completion of a vapor monitoring and detection system (VMDS) pilot scale effort in AP and A Area Farms, and this surveillance aimed to take a snapshot review of the VMDS equipment viability assessment reports and integration of VMDS into CVAP KPP efforts moving forward. A large focus of this surveillance centered upon discussions with numerous WRPS groups involved in the VMDS readiness effort (technology development, engineering, projects, industrial hygiene programs, and operations) to gain a better understanding, from their perspective, as to important aspects of the equipment and how the equipment supplements, and contributes to, a safer work environment at the Hanford Tank Farms.</p> <p>17173-TF-001 (Lynch) – WRPS should refine and utilize its draft integrated schedule to drive overall organizational integration for greater urgency, improved schedule performance, and operational readiness of VMDS equipment.</p>
3/5/2018	WRPS-PER-2018-0552	Consider lessons learned when developing functional requirements of equipment design	<p>TITLE of PER: WRPS should consider documenting lessons learned to improve their processes for defining equipment functional and end state requirement</p> <p>Scope: The vapors management program centers on three main objectives: 1. Manage the hazards 2. Conduct high-quality conduct of operations 3. Engage and fully support the workforce</p> <p>Based on information gathered and analyzed in the first phase (FY15-16) of vapors implementation and feedback and recommendations from multiple external assessments, a more comprehensive strategy to address vapors was developed to ensure all workers on the Hanford Central Plateau are safe—feel safe. To inform this strategy, the Comprehensive Vapor Action Plan (CVAP) was drafted and included eight key performance parameters (KPPs) important to the success of the vapor management program. As described in ORP Contracting Officer letter 17-TF-0015, dated March 1, 2017, these KPPs included:</p> <ol style="list-style-type: none"> <li>1. Establish a comprehensive vapor management communication plan, engagement processes, and effectiveness measurements.</li> <li>2. Maintain the Industrial Hygiene Chemical Vapor Technical Basis and Chemicals of Potential Concern (COPC). Institutionalize a disciplined and rigorous process for updates to include new scientific findings and enhanced understanding of potential exposures.</li> <li>3. Maintain Industrial Hygiene Program and institutionalize vapor program requirements, best practices and program parity, and complete necessary training to support full implementation at the beginning of FY 2018.</li> <li>4. Complete engineering control concept demonstrations for Strobic Tri-Stack and NUCON International Inc. thermal combustion in support of unrestricted work boundaries.</li> <li>5. Define unrestricted work boundaries and implement monitoring on active stack ventilation and unrestricted work boundaries in the A Area farms to provide defense in depth.</li> <li>6. Institutionalize a tank operations stewardship program that minimizes required tank farm personnel entries; and establishes parameters for locating ancillary personnel and offices.</li> <li>7. Provide options to promote the hierarchy of controls for chemical vapor respiratory protection beyond current use self-contained breathing apparatus.</li> <li>8. Support medical program enhancements in conjunction with responsible Hanford site organizations and establish update to WRPS process/procedures as required.</li> </ol> <p>This surveillance focused on KPP 5 for implementing monitoring on active stack ventilation and unrestricted work boundaries for defense in depth. Specifically, Washington River Protection Solutions (WRPS) is nearing completion of a vapor monitoring and detection system (VMDS) pilot scale effort in AP and A Area Farms, and this surveillance aimed to take a snapshot review of the VMDS equipment viability assessment reports and integration of VMDS into CVAP KPP efforts moving forward. A large focus of this surveillance centered upon discussions with numerous WRPS groups involved in the VMDS readiness effort (technology development, engineering, projects, industrial hygiene programs, and operations) to gain a better understanding, from their perspective, as to important aspects of the equipment and how the equipment supplements, and contributes to, a safer work environment at the Hanford Tank Farms.</p> <p>17173-TF-002 (Lynch, (b)(6)) – WRPS should consider documenting lessons learned to improve their processes for defining equipment functional and end state requirement prior to procurement and testing of equipment being considered for use at the Hanford Tank Farms.</p>
3/5/2018	WRPS-PER-2018-0553	WRPS Operations Group should consider performing a MOP after the stack monitors and VMDS equipment are operational to evaluate	<p>TITLE of PER: WRPS Operations Group should consider performing a MOP after the stack monitors and VMDS equipment are operational to evaluate effectiveness of the Operations training strategy.</p> <p>Scope: The vapors management program centers on three main objectives: 1. Manage the hazards 2. Conduct high-quality conduct of operations 3. Engage and fully support the workforce</p> <p>Based on information gathered and analyzed in the first phase (FY15-16) of vapors implementation and feedback and recommendations from multiple external assessments, a more comprehensive strategy to address vapors was developed to ensure all workers on the Hanford Central Plateau are safe—feel safe. To inform this strategy, the Comprehensive Vapor Action Plan (CVAP) was drafted and included eight key performance parameters (KPPs) important to the success of the vapor management program. As described in ORP Contracting Officer letter 17-TF-0015, dated March 1, 2017, these KPPs included:</p> <ol style="list-style-type: none"> <li>1. Establish a comprehensive vapor management communication plan, engagement processes, and effectiveness measurements.</li> <li>2. Maintain the Industrial Hygiene Chemical Vapor Technical Basis and Chemicals of Potential Concern (COPC). Institutionalize a disciplined and rigorous process for updates to include new scientific findings and enhanced understanding of potential exposures.</li> <li>3. Maintain Industrial Hygiene Program and institutionalize vapor program requirements, best practices and program parity, and complete necessary training to support full implementation at the beginning of FY 2018.</li> <li>4. Complete engineering control concept demonstrations for Strobic Tri-Stack and NUCON International Inc. thermal combustion in support of unrestricted work boundaries.</li> <li>5. Define unrestricted work boundaries and implement monitoring on active stack ventilation and unrestricted work boundaries in the A Area farms to provide defense in depth.</li> <li>6. Institutionalize a tank operations stewardship program that minimizes required tank farm personnel entries; and establishes parameters for locating ancillary personnel and offices.</li> <li>7. Provide options to promote the hierarchy of controls for chemical vapor respiratory protection beyond current use self-contained breathing apparatus.</li> <li>8. Support medical program enhancements in conjunction with responsible Hanford site organizations and establish update to WRPS process/procedures as required.</li> </ol> <p>This surveillance focused on KPP 5 for implementing monitoring on active stack ventilation and unrestricted work boundaries for defense in depth. Specifically, Washington River Protection Solutions (WRPS) is nearing completion of a vapor monitoring and detection system (VMDS) pilot scale effort in AP and A Area Farms, and this surveillance aimed to take a snapshot review of the VMDS equipment viability assessment reports and integration of VMDS into CVAP KPP efforts moving forward. A large focus of this surveillance centered upon discussions with numerous WRPS groups involved in the VMDS readiness effort (technology development, engineering, projects, industrial hygiene programs, and operations) to gain a better understanding, from their perspective, as to important aspects of the equipment and how the equipment supplements, and contributes to, a safer work environment at the Hanford Tank Farms.</p> <p>17173-TF-003 (Lynch, (b)(6)) – WRPS Operations Group should consider performing a MOP after the stack monitors and VMDS equipment are operational to evaluate effectiveness of the Operations training strategy.</p>

3/5/2018	WRPS-PER-2018-0554	WRPS needs to develop a strategy to effectively communicate benefits of the stack monitors and VMDS equipment and how the equipment supplements and strengthens WRPS' worker protection strategy	<p><b>TITLE of PER:</b> WRPS needs to develop a strategy to effectively communicate benefits of the stack monitors and VMDS equipment and how the equipment supplements and strengthens WRPS' worker protection strategy</p> <p><b>Scope:</b> The vapors management program centers on three main objectives:  <ol style="list-style-type: none"> <li>1. Manage the hazards</li> <li>2. Conduct high-quality conduct of operations</li> <li>3. Engage and fully support the workforce</li> </ol> </p> <p>Based on information gathered and analyzed in the first phase (FY15-16) of vapors implementation and feedback and recommendations from multiple external assessments, a more comprehensive strategy to address vapors was developed to ensure all workers on the Hanford Central Plateau are safe—feel safe. To inform this strategy, the Comprehensive Vapor Action Plan (CVAP) was drafted and included eight key performance parameters (KPPs) important to the success of the vapor management program. As described in ORP Contracting Officer letter 17-TF-0015, dated March 1, 2017, these KPPs included:  <ol style="list-style-type: none"> <li>1. Establish a comprehensive vapor management communication plan, engagement processes, and effectiveness measurements.</li> <li>2. Maintain the Industrial Hygiene Chemical Vapor Technical Basis and Chemicals of Potential Concern (COPC). Institutionalize a disciplined and rigorous process for updates to include new scientific findings and enhanced understanding of potential exposures.</li> <li>3. Maintain Industrial Hygiene Program and institutionalize vapor program requirements, best practices and program parity, and complete necessary training to support full implementation at the beginning of FY 2018.</li> <li>4. Complete engineering control concept demonstrations for Strobic Tri-Stack and NUCON International Inc. thermal combustion in support of unrestricted work boundaries.</li> <li>5. Define unrestricted work boundaries and implement monitoring on active stack ventilation and unrestricted work boundaries in the A Area farms to provide defense in depth.</li> <li>6. Institutionalize a tank operations stewardship program that minimizes required tank farm personnel entries; and establishes parameters for locating ancillary personnel and offices.</li> <li>7. Provide options to promote the hierarchy of controls for chemical vapor respiratory protection beyond current use self-contained breathing apparatus.</li> <li>8. Support medical program enhancements in conjunction with responsible Hanford site organizations and establish update to WRPS process/procedures as required.</li> </ol> </p> <p>This surveillance focused on KPP 5 for implementing monitoring on active stack ventilation and unrestricted work boundaries for defense in depth. Specifically, Washington River Protection Solutions (WRPS) is nearing completion of a vapor monitoring and detection system (VMDS) pilot scale effort in AP and A Area Farms, and this surveillance aimed to take a snapshot review of the VMDS equipment viability assessment reports and integration of VMDS into CVAP KPP efforts moving forward. A large focus of this surveillance centered upon discussions with numerous WRPS groups involved in the VMDS readiness effort (technology development, engineering, projects, industrial hygiene programs, and operations) to gain a better understanding, from their perspective, as to important aspects of the equipment and how the equipment supplements, and contributes to, a safer work environment at the Hanford Tank Farms.</p> <p>-----  <b>17173-TF-004 (Lynch, (b)(6)) – WRPS needs to develop a strategy to effectively communicate benefits of the stack monitors and VMDS equipment and how the equipment supplements and strengthens WRPS' worker protection strategy</b>  <b>Discussion:</b>  To avoid confusion among the workforce, WRPS needs to clearly describe how the VMDS equipment will be used during Tank Farm operations and any assumptions for using that equipment.</p>
3/5/2018	WRPS-PER-2018-0555	capture or control faulty Respiratory equipment	<p>Currently there is no system in place to capture or control faulty Respiratory equipment or necessary samples taken from the faulty respiratory equipment. Multiple incidents where samples taken have come up missing or not analyzed at all. Equipment usually ends up sitting for long periods of time uncontrolled. There isn't a chain of custody or way to track equipment from when an issues and concerns form is filled out until final disposition.</p>
3/5/2018	WRPS-PER-2018-0556	Roof of 2704HV Material	<p>During a JHA walk-down for a roof replacement project at 2704HV a Cobra employee utilized a razor blade to cut out a section of roofing material on the roof of 2704HV. A yellow-colored, friable material was dispersed once the piece of roofing material was cut out. The Cobra employee pulled the piece of roofing out to inspect it and measure how thick the material was. After inspection, the Cobra employee placed the piece of roofing material back to its original position and attempted to tape it down. The tape did not stick very well because the roof had a lot of dirt and roofing material on it. No further actions were taken to further fasten the roofing material back down. Roofing material for 2704HV has not been sampled for Asbestos and according to OSHA's asbestos standard, the roof must be treated as if it contains asbestos until sample results prove otherwise.</p>

3/6/2018	WRPS- PER- 2018- 0557	LERF Contaminat ed Tumblewee d Fragments	<p>During the performance of a Scheduled Radiation Survey Task Description (LE-W098) at LERF, contaminated tumbleweed fragments were discovered.</p> <p>Total Contamination of:</p> <p>Outside the NE corner of Basin 44 perimeter fence inside a Soil Contamination Area:</p> <p>Location # 1: 15,200 dpm/100 cm<sup>2</sup> Beta-Gamma and 14 dpm/100 cm<sup>2</sup> Alpha,</p> <p>Location # 2: 6,200 dpm/100 cm<sup>2</sup> Beta-Gamma and &lt;500 dpm/100 cm<sup>2</sup> Alpha</p> <p>No removable contamination was detected. The tumbleweed fragments were properly disposed of.</p> <p>Survey results are documented in Survey Simple on survey # LE-1800445.</p>
3/6/2018	WRPS- PER- 2018- 0558	Two containers of spent antifreeze located outside of the north side of the 242-A Evaporator were	<p>TITLE of PER: Two containers of spent antifreeze located outside of the north side of the 242-A Evaporator were improperly labeled and stored</p> <p>Title: Inspection of propylene glycol recycle containers stored near 242-A Evaporator</p> <p>Summary: On February 14, 2018, during a walk down of the north side of 242-A Evaporator, ECD representatives observed two, metal 55-gallon drums sitting on a wooden pallet. The two drums, TFP-17-296-09 and TFP-17-296-10, were each labeled with a green "Recycle" label. Attachments 1-3 are photographs of the drums. "Used Propylene Glycol" was written on each drum's recycle label. A follow-up document review conducted by ECD revealed the containers were improperly labeled and stored (see Finding 35821-TF-F01). The 242-A Evaporator WRPS Environmental Field Representative was notified on February 14, 2018.</p> <hr/> <p>Issue Type: Finding (Level 3) Significance Level: D</p> <p>Statement: 35821-TF-F01: Two containers of spent antifreeze located outside of the north side of the 242-A Evaporator were improperly labeled and stored (Priority Level 3, Rana Evans and Joe Sondag).</p> <p>Discussion: Contrary to requirements, the containers were incorrectly labeled, secondary containment was not provided and the spent antifreeze was not in a plastic UN1H1 drums.</p> <p>1. Labeling: WAC 173-303-522, "Special requirements for recycling spent antifreeze" and HNF-EP-0863, rev. 3, "Management Plan for Recyclable Materials Administered by Hanford's Centralized Consolidation/Recycling Center" require the words, "Spent Antifreeze" on the recycle containers. The containers each had a green, "recycle" label with the words "Used Propylene Glycol" on the label.</p> <p>2. Secondary containment: Both WAC 173-303-522 and HNF-EP-0863 state, "During accumulation, spent antifreeze will be stored in a manner to prevent releases to the environment. This includes, but is not limited to, storing wastes in compatible containers, on impermeable surfaces, or in secondary containment structures." Also, the Waste Planning Checklist (WPC) associated with the Work Order (327063) under which the propylene glycol was generated stated, "Store on spill pallets." The containers were on a wooden pallet.</p> <p>3. Incorrect containers: The WPC specified plastic, UN1H1 drums. The containers were metal, 55-gallon drums. The 242-A WRPS Environmental Field Representative was notified of ECD's concerns on February 14, 2018.</p>
3/6/2018	WRPS- PER- 2018- 0559	Mandatory Wipe of Skin Contacting Surfaces Prior to Use of full face RPE	<p>On February 12 an Industrial Hygiene Flash was issued. It imposed a mandatory wipe down of mask face piece contact surfaces in change trailers using potable water.</p> <p>This practice contradicts the goal of providing clean masks to affected workers.</p> <p>Consider the reaction to this scenario. When getting a flu shot in the fall the medical provider removes the hypodermic needle from its packaging, takes it to a drinking fountain, washes it off and then administers the vaccine. This would be unacceptable. Likewise removing a clean mask from its packaging and performing a field "cleaning" using potable water should also be unacceptable.</p>

3/6/2018	WRPS-PER-2018-0560	Corrective Action WRPS-PER-2014-0871.1	<p>This PER is initiated to resolve components of Corrective Action WRPS-PER-2014-0871.1. This scope of this corrective action addresses over 70 different issues and will be broken into task specific PERs to make resolution of these issues manageable and more easily tracked to closure.</p> <p>This specific PER addresses concerns raised with the Aging Waste Air Inlet Units. The scope involved tank vacuum relief valves PCV-AY101K1-2, PCV-AZ101K1-2, and PCV-AZ102K1-2. The concern was that the valves were not operational and their PMs were not current. Since the time the corrective action was generated, vacuum relief valves PCV-AY101K1-2 and PCV-AZ101K1-2 were verified to be operational and their PMs (ET-105353 and ET-105355) are current through April 2019. However, vacuum relief valve PCV-AZ102K1-2 recently failed its functional test. Rebuilt kits have been acquired and a work order prepared (381246) for repair of the valve, after which the valve will again be functionally tested. The purpose of this PER is to track the repair and functional testing of vacuum relief valve PCV-AZ102K1-2.</p>
3/6/2018	WRPS-PER-2018-0497	222-5 received expired material from MSA Stores	<p>Title: Expired material received from MSA Stores</p> <p>On 1/30/18 Standards Lab received Ethanol procured via MR-17-06987. The Ethanol expired on 1-27-2018. On 1-31-18 MSA's Asset Control believed there was someone MSA had on site to provide an extension of expiration dates, but that this person had retired. On 2-5-18, QA hold tag was applied to the material and internal expiration date extension process was initiated. This material is used to fill laboratory squeeze bottles used in general small scale cleaning around the laboratory and not for analytical processes.</p> <p>It is unclear who performs the function of extending expirations dates at MSA, as the previous individual has retired.</p> <p>WHL Condition Request 2018-0012</p>
3/6/2018	WRPS-PER-2018-0500	222-5 Received material that did not match vendor invoice	<p>Title: Material received did not match vendor invoice</p> <p>On 2-1-18, Standards Lab received a shipment and the invoice indicated it was PO Order number H78949882147, which is associated with MR-18-00142. The item in that MR is 2-ethyl-2-hexenal from Sigma-Aldrich. Upon opening the box the physical contents was Sodium Citrate, from Sigma-Aldrich, which has a PO order number of H78949882148 and MR-18-00313. Upon notifying the material coordinator of this issue, the vendor JD Sales, had sent an e-mail stating there was a switch that occurred in their office. The Material requests, received invoice and e-mail from JD Sales are attached.</p> <p>Note: the invoice ("Sales Order Picking List") shows "2-Ethyl-2-Hexane" in the product description; however, the part number (under "Item") corresponds to 2-Ethyl-2-Hexenal.</p> <p>WHL Condition request 2018-0014</p>

3/6/2018	WRPS- PER- 2018- 0561	Free Standing Liquid in a Waste Container Shipped to Perma-Fix NW	Container TFP-17-276-01, a 9x5x5 box, which was generated by the AX O4C pump removal project, was sent to Permafix NW on 2/14/18. When Permafix opened the container on 2/28/18 they discovered water in the bottom of the container (see attachment). Water is a prohibited item for radioactive shipments in a 9x5x5 box. The Generator Certification Form completed for this waste indicated there was no water in the package. This was a potential Department of Transportation Violation and procedure TO-100-052 lists water as a prohibited item.
3/6/2018	WRPS- PER- 2018- 0511	222-S Fixed Head Samplers in Rm 1N need to be discarded as waste	In 222-S Room1N the fixed head air samplers are old and need to be discarded as waste. Need a new work package put together since the waste authorization has now expired. This was discovered during the January 2018 Safety EAPC Walk down.  Title: Discard fixed head air samplers from Room #1N.
3/6/2018	WRPS- PER- 2018- 0563	TFC-PLN-23 fails to cover obsolescenc e.	<p>Report Number and Title:16157-TF WRPS Configuration Management</p> <p>Scope: Verify the WRPS configuration management program meet the requirements of the DOE order and standard that pertain to them and ensure processes are being implemented adequately, per DOE O 420.1 C, Nuclear Facility Safety and DOE-STD-1073-2003, Configuration Management. A CM program is a requirement of DOE O 420.1 C, Attachment 2, Chapter V, Paragraph 3.c.DOE-STD-1073-2003 is an acceptable method to meet this requirement, which WRPS has invoked in TFC-POL-07 and TFC-PLN-23.</p> <p>It is noted that the latest revision of DOE-STD-1073 (Configuration Management) was issued in December 2016, but the revision referenced in WRPS's Configuration Management Plan (TFCPLN-23) is the 2003 revision. Due to the fact that DOE-STD-1073 is not specifically listed in the TOC contract and it is considered a best practice to utilize the latest revision of a DOE standard, WRPS's Configuration Management procedure set was reviewed against the 2016 revision. Where discrepancies between the 2016 version and WRPS's procedures were identified, the requirements from the currently invoked 2003 version were also reviewed. Due to the fact that WRPS invokes a 15 year old revision of the Configuration Management DOE standard, reviewing and updating WRPS's procedures to invoke the 2016 revision is identified as an OFI (16157-TF-001).</p> <p>The following five key elements for effective CM, per DOE-STD-1073-2016, were reviewed:</p> <p>Design Control, Work Control, Change Control, Document Control, and Assessments. This surveillance looked to ensure the basic objectives of CM were being applied. Specifically:</p> <ol style="list-style-type: none"> <li>1) Establish consistency among design requirements, physical configuration, and documentation (including analysis, drawings, and procedures) for the facility or activity; and</li> <li>2) Maintain this consistency throughout the life of the facility or activity, particularly as changes are being made.</li> </ol> <p>Executive Summary: The assessors noted that the Configuration Management (CM) program is adequately being managed by the Tank Operations Contractor, with the exception of two findings and nine opportunities for improvement. A summary of the issues are contained below, with the full description contained at the end of the discussion.</p> <p>This assessment is divided into two general areas: Processes that resides mostly within engineering (e.g., Design Control, Change Control and Document Control); and processes that reside mostly outside engineering and interfaces with those other organizations. While the Engineering Department is responsible for the CM program at WRPS, the program is heavily dependent on Maintenance and Operations to control and report the status of configuration of systems. The Engineering department seems to do a good job managing the components that are largely under their control, with a few minor issues. However, there are still concerns on how Maintenance and Operations interact with those CM systems (e.g., SECD/SPF) that engineering is mostly responsible for.</p>

3/6/2018	WRPS-PER-2018-0564	WRPS should consider reviewing and updating WRPS's procedures to invoke the 2016 revision of DOE-STD-1073	<p>Report Number and Title: 16157-TF WRPS Configuration Management</p> <p>Scope: Verify the WRPS configuration management program meet the requirements of the DOE order and standard that pertain to them and ensure processes are being implemented adequately, per DOE O 420.1 C, Nuclear Facility Safety and DOE-STD-1073-2003, Configuration Management. A CM program is a requirement of DOE O 420.1 C, Attachment 2, Chapter V, Paragraph 3.c. DOE-STD-1073-2003 is an acceptable method to meet this requirement, which WRPS has invoked in TFC-POL-07 and TFC-PLN-23.</p> <p>It is noted that the latest revision of DOE-STD-1073 (Configuration Management) was issued in December 2016, but the revision referenced in WRPS's Configuration Management Plan (TFCPLN-23) is the 2003 revision. Due to the fact that DOE-STD-1073 is not specifically listed in the TOC contract and it is considered a best practice to utilize the latest revision of a DOE standard, WRPS's Configuration Management procedure set was reviewed against the 2016 revision. Where discrepancies between the 2016 version and WRPS's procedures were identified, the requirements from the currently invoked 2003 version were also reviewed. Due to the fact that WRPS invokes a 15 year old revision of the Configuration Management DOE standard, reviewing and updating WRPS's procedures to invoke the 2016 revision is identified as an OFI (16157-TF-001).</p> <p>The following five key elements for effective CM, per DOE-STD-1073-2016, were reviewed:</p> <p>Design Control, Work Control, Change Control, Document Control, and Assessments. This surveillance looked to ensure the basic objectives of CM were being applied. Specifically:</p> <ol style="list-style-type: none"> <li>1) Establish consistency among design requirements, physical configuration, and documentation (including analysis, drawings, and procedures) for the facility or activity; and</li> <li>2) Maintain this consistency throughout the life of the facility or activity, particularly as changes are being made.</li> </ol> <p>Executive Summary: The assessors noted that the Configuration Management (CM) program is adequately being managed by the Tank Operations Contractor, with the exception of two findings and nine opportunities for improvement. A summary of the issues are contained below, with the full description contained at the end of the discussion.</p> <p>This assessment is divided into two general areas: Processes that resides mostly within engineering (e.g., Design Control, Change Control and Document Control); and processes that reside mostly outside engineering and interfaces with those other organizations. While the Engineering Department is responsible for the CM program at WRPS, the program is heavily dependent on Maintenance and Operations to control and report the status of configuration of systems. The Engineering department seems to do a good job managing the components that are largely under their control, with a few minor issues. However, there are still concerns on how Maintenance and Operations interact with those CM systems (e.g., SECD/SPF) that engineering is mostly responsible for.</p>
3/6/2018	WRPS-PER-2018-0566	Consider including chloride stress and intergranular stress in Attachment A of TFC-ENG-DESIGN-C-45	<p>Number and Title: 16157-TF WRPS Configuration Management</p> <p>Scope: Verify the WRPS configuration management program meet the requirements of the DOE order and standard that pertain to them and ensure processes are being implemented adequately, per DOE O 420.1 C, Nuclear Facility Safety and DOE-STD-1073-2003, Configuration Management. A CM program is a requirement of DOE O 420.1 C, Attachment 2, Chapter V, Paragraph 3.c. DOE-STD-1073-2003 is an acceptable method to meet this requirement, which WRPS has invoked in TFC-POL-07 and TFC-PLN-23.</p> <p>It is noted that the latest revision of DOE-STD-1073 (Configuration Management) was issued in December 2016, but the revision referenced in WRPS's Configuration Management Plan (TFCPLN-23) is the 2003 revision. Due to the fact that DOE-STD-1073 is not specifically listed in the TOC contract and it is considered a best practice to utilize the latest revision of a DOE standard, WRPS's Configuration Management procedure set was reviewed against the 2016 revision. Where discrepancies between the 2016 version and WRPS's procedures were identified, the requirements from the currently invoked 2003 version were also reviewed. Due to the fact that WRPS invokes a 15 year old revision of the Configuration Management DOE standard, reviewing and updating WRPS's procedures to invoke the 2016 revision is identified as an OFI (16157-TF-001).</p> <p>The following five key elements for effective CM, per DOE-STD-1073-2016, were reviewed:</p> <p>Design Control, Work Control, Change Control, Document Control, and Assessments. This surveillance looked to ensure the basic objectives of CM were being applied. Specifically:</p> <ol style="list-style-type: none"> <li>1) Establish consistency among design requirements, physical configuration, and documentation (including analysis, drawings, and procedures) for the facility or activity; and</li> <li>2) Maintain this consistency throughout the life of the facility or activity, particularly as changes are being made.</li> </ol> <p>Executive Summary: The assessors noted that the Configuration Management (CM) program is adequately being managed by the Tank Operations Contractor, with the exception of two findings and nine opportunities for improvement. A summary of the issues are contained below, with the full description contained at the end of the discussion.</p> <p>This assessment is divided into two general areas: Processes that resides mostly within engineering (e.g., Design Control, Change Control and Document Control); and processes that reside mostly outside engineering and interfaces with those other organizations. While the Engineering Department is responsible for the CM program at WRPS, the program is heavily dependent on Maintenance and Operations to control and report the status of configuration of systems. The Engineering department seems to do a good job managing the components that are largely under their control, with a few minor issues. However, there are still concerns on how Maintenance and Operations interact with those CM systems (e.g., SECD/SPF) that engineering is mostly responsible for.</p>
3/6/2018	WRPS-PER-2018-0567	WRPS should consider correcting reference to a procedure that does not exist in section 5.7 of	<p>Number and Title: 16157-TF WRPS Configuration Management</p> <p>Scope: Verify the WRPS configuration management program meet the requirements of the DOE order and standard that pertain to them and ensure processes are being implemented adequately, per DOE O 420.1 C, Nuclear Facility Safety and DOE-STD-1073-2003, Configuration Management. A CM program is a requirement of DOE O 420.1 C, Attachment 2, Chapter V, Paragraph 3.c. DOE-STD-1073-2003 is an acceptable method to meet this requirement, which WRPS has invoked in TFC-POL-07 and TFC-PLN-23.</p> <p>It is noted that the latest revision of DOE-STD-1073 (Configuration Management) was issued in December 2016, but the revision referenced in WRPS's Configuration Management Plan (TFCPLN-23) is the 2003 revision. Due to the fact that DOE-STD-1073 is not specifically listed in the TOC contract and it is considered a best practice to utilize the latest revision of a DOE standard, WRPS's Configuration Management procedure set was reviewed against the 2016 revision. Where discrepancies between the 2016 version and WRPS's procedures were identified, the requirements from the currently invoked 2003 version were also reviewed. Due to the fact that WRPS invokes a 15 year old revision of the Configuration Management DOE standard, reviewing and updating WRPS's procedures to invoke the 2016 revision is identified as an OFI (16157-TF-001).</p> <p>The following five key elements for effective CM, per DOE-STD-1073-2016, were reviewed:</p> <p>Design Control, Work Control, Change Control, Document Control, and Assessments. This surveillance looked to ensure the basic objectives of CM were being applied. Specifically:</p> <ol style="list-style-type: none"> <li>1) Establish consistency among design requirements, physical configuration, and documentation (including analysis, drawings, and procedures) for the facility or activity; and</li> <li>2) Maintain this consistency throughout the life of the facility or activity, particularly as changes are being made.</li> </ol> <p>Executive Summary: The assessors noted that the Configuration Management (CM) program is adequately being managed by the Tank Operations Contractor, with the exception of two findings and nine opportunities for improvement. A summary of the issues are contained below, with the full description contained at the end of the discussion.</p> <p>This assessment is divided into two general areas: Processes that resides mostly within engineering (e.g., Design Control, Change Control and Document Control); and processes that reside mostly outside engineering and interfaces with those other organizations. While the Engineering Department is responsible for the CM program at WRPS, the program is heavily dependent on Maintenance and Operations to control and report the status of configuration of systems. The Engineering department seems to do a good job managing the components that are largely under their control, with a few minor issues. However, there are still concerns on how Maintenance and Operations interact with those CM systems (e.g., SECD/SPF) that engineering is mostly responsible for.</p>

3/6/2018	WRPS-PER-2018-0568	WRPS should consider making configuration management interface controls clearer in TFC-PLN-23	<p>Number and Title:16157-TF WRPS Configuration Management</p> <p>Scope: Verify the WRPS configuration management program meet the requirements of the DOE order and standard that pertain to them and ensure processes are being implemented adequately, per DOE O 420.1 C, Nuclear Facility Safety and DOE-STD-1073-2003, Configuration Management. A CM program is a requirement of DOE O 420.1 C, Attachment 2, Chapter V, Paragraph 3.c.DOE-STD-1073-2003 is an acceptable method to meet this requirement, which WRPS has invoked in TFC-POL-07 and TFC-PLN-23.</p> <p>It is noted that the latest revision of DOE-STD-1073 (Configuration Management) was issued in December 2016, but the revision referenced in WRPS's Configuration Management Plan (TFCPLN-23) is the 2003 revision. Due to the fact that DOE-STD-1073 is not specifically listed in the TOC contract and it is considered a best practice to utilize the latest revision of a DOE standard, WRPS's Configuration Management procedure set was reviewed against the 2016 revision. Where discrepancies between the 2016 version and WRPS's procedures were identified, the requirements from the currently invoked 2003 version were also reviewed. Due to the fact that WRPS invokes a 15 year old revision of the Configuration Management DOE standard, reviewing and updating WRPS's procedures to invoke the 2016 revision is identified as an OFI (16157-TF-001).</p> <p>The following five key elements for effective CM, per DOE-STD-1073-2016, were reviewed:</p> <p>Design Control, Work Control, Change Control, Document Control, and Assessments. This surveillance looked to ensure the basic objectives of CM were being applied. Specifically:</p> <p>1) Establish consistency among design requirements, physical configuration, and documentation (including analysis, drawings, and procedures) for the facility or activity; and 2) Maintain this consistency throughout the life of the facility or activity, particularly as changes are being made.</p> <p>Executive Summary: The assessors noted that the Configuration Management (CM) program is adequately being managed by the Tank Operations Contractor, with the exception of two findings and nine opportunities for improvement. A summary of the issues are contained below, with the full description contained at the end of the discussion.</p> <p>This assessment is divided into two general areas: Processes that resides mostly within engineering (e.g., Design Control, Change Control and Document Control); and processes that reside mostly outside engineering and interfaces with those other organizations. While the Engineering Department is responsible for the CM program at WRPS, the program is heavily dependent on Maintenance and Operations to control and report the status of configuration of systems. The Engineering department seems to do a good job managing the components that are largely under their control, with a few minor issues. However, there are still concerns on how Maintenance and Operations interact with those CM systems (e.g., SECD/SPF) that engineering is mostly responsible for.</p>
3/6/2018	WRPS-PER-2018-0569	WRPS should make clear which CM training is available in TFC-PLN-23	<p>Number and Title:16157-TF WRPS Configuration Management</p> <p>Scope: Verify the WRPS configuration management program meet the requirements of the DOE order and standard that pertain to them and ensure processes are being implemented adequately, per DOE O 420.1 C, Nuclear Facility Safety and DOE-STD-1073-2003, Configuration Management. A CM program is a requirement of DOE O 420.1 C, Attachment 2, Chapter V, Paragraph 3.c.DOE-STD-1073-2003 is an acceptable method to meet this requirement, which WRPS has invoked in TFC-POL-07 and TFC-PLN-23.</p> <p>It is noted that the latest revision of DOE-STD-1073 (Configuration Management) was issued in December 2016, but the revision referenced in WRPS's Configuration Management Plan (TFCPLN-23) is the 2003 revision. Due to the fact that DOE-STD-1073 is not specifically listed in the TOC contract and it is considered a best practice to utilize the latest revision of a DOE standard, WRPS's Configuration Management procedure set was reviewed against the 2016 revision. Where discrepancies between the 2016 version and WRPS's procedures were identified, the requirements from the currently invoked 2003 version were also reviewed. Due to the fact that WRPS invokes a 15 year old revision of the Configuration Management DOE standard, reviewing and updating WRPS's procedures to invoke the 2016 revision is identified as an OFI (16157-TF-001).</p> <p>The following five key elements for effective CM, per DOE-STD-1073-2016, were reviewed:</p> <p>Design Control, Work Control, Change Control, Document Control, and Assessments. This surveillance looked to ensure the basic objectives of CM were being applied. Specifically:</p> <p>1) Establish consistency among design requirements, physical configuration, and documentation (including analysis, drawings, and procedures) for the facility or activity; and 2) Maintain this consistency throughout the life of the facility or activity, particularly as changes are being made.</p> <p>Executive Summary: The assessors noted that the Configuration Management (CM) program is adequately being managed by the Tank Operations Contractor, with the exception of two findings and nine opportunities for improvement. A summary of the issues are contained below, with the full description contained at the end of the discussion.</p> <p>This assessment is divided into two general areas: Processes that resides mostly within engineering (e.g., Design Control, Change Control and Document Control); and processes that reside mostly outside engineering and interfaces with those other organizations. While the Engineering Department is responsible for the CM program at WRPS, the program is heavily dependent on Maintenance and Operations to control and report the status of configuration of systems. The Engineering department seems to do a good job managing the components that are largely under their control, with a few minor issues. However, there are still concerns on how Maintenance and Operations interact with those CM systems (e.g., SECD/SPF) that engineering is mostly responsible for.</p>
3/6/2018	WRPS-PER-2018-0570	WRPS should consider better integrating line organizations into the CM process and TFC-PLN-23	<p>Number and Title:16157-TF WRPS Configuration Management</p> <p>Scope: Verify the WRPS configuration management program meet the requirements of the DOE order and standard that pertain to them and ensure processes are being implemented adequately, per DOE O 420.1 C, Nuclear Facility Safety and DOE-STD-1073-2003, Configuration Management. A CM program is a requirement of DOE O 420.1 C, Attachment 2, Chapter V, Paragraph 3.c.DOE-STD-1073-2003 is an acceptable method to meet this requirement, which WRPS has invoked in TFC-POL-07 and TFC-PLN-23.</p> <p>It is noted that the latest revision of DOE-STD-1073 (Configuration Management) was issued in December 2016, but the revision referenced in WRPS's Configuration Management Plan (TFCPLN-23) is the 2003 revision. Due to the fact that DOE-STD-1073 is not specifically listed in the TOC contract and it is considered a best practice to utilize the latest revision of a DOE standard, WRPS's Configuration Management procedure set was reviewed against the 2016 revision. Where discrepancies between the 2016 version and WRPS's procedures were identified, the requirements from the currently invoked 2003 version were also reviewed. Due to the fact that WRPS invokes a 15 year old revision of the Configuration Management DOE standard, reviewing and updating WRPS's procedures to invoke the 2016 revision is identified as an OFI (16157-TF-001).</p> <p>The following five key elements for effective CM, per DOE-STD-1073-2016, were reviewed:</p> <p>Design Control, Work Control, Change Control, Document Control, and Assessments. This surveillance looked to ensure the basic objectives of CM were being applied. Specifically:</p> <p>1) Establish consistency among design requirements, physical configuration, and documentation (including analysis, drawings, and procedures) for the facility or activity; and 2) Maintain this consistency throughout the life of the facility or activity, particularly as changes are being made.</p> <p>Executive Summary: The assessors noted that the Configuration Management (CM) program is adequately being managed by the Tank Operations Contractor, with the exception of two findings and nine opportunities for improvement. A summary of the issues are contained below, with the full description contained at the end of the discussion.</p> <p>This assessment is divided into two general areas: Processes that resides mostly within engineering (e.g., Design Control, Change Control and Document Control); and processes that reside mostly outside engineering and interfaces with those other organizations. While the Engineering Department is responsible for the CM program at WRPS, the program is heavily dependent on Maintenance and Operations to control and report the status of configuration of systems. The Engineering department seems to do a good job managing the components that are largely under their control, with a few minor issues. However, there are still concerns on how Maintenance and Operations interact with those CM systems (e.g., SECD/SPF) that engineering is mostly responsible for.</p>

3/6/2018	WRPS-PER-2018-0572	WRPS should consider clarifying roles and responsibilities in TFC-OPS-OPER-C-13 and TFC-ENG-DESIGN-C-56 in relation to ECNs	<p>Number and Title: 16157-TF WRPS Configuration Management</p> <p>Scope: Verify the WRPS configuration management program meet the requirements of the DOE order and standard that pertain to them and ensure processes are being implemented adequately, per DOE O 420.1 C, Nuclear Facility Safety and DOE-STD-1073-2003, Configuration Management. A CM program is a requirement of DOE O 420.1 C, Attachment 2, Chapter V, Paragraph 3.c. DOE-STD-1073-2003 is an acceptable method to meet this requirement, which WRPS has invoked in TFC-POL-07 and TFC-PLN-23.</p> <p>It is noted that the latest revision of DOE-STD-1073 (Configuration Management) was issued in December 2016, but the revision referenced in WRPS's Configuration Management Plan (TFCPLN-23) is the 2003 revision. Due to the fact that DOE-STD-1073 is not specifically listed in the TOC contract and it is considered a best practice to utilize the latest revision of a DOE standard, WRPS's Configuration Management procedure set was reviewed against the 2016 revision. Where discrepancies between the 2016 version and WRPS's procedures were identified, the requirements from the currently invoked 2003 version were also reviewed. Due to the fact that WRPS invokes a 15 year old revision of the Configuration Management DOE standard, reviewing and updating WRPS's procedures to invoke the 2016 revision is identified as an OFI (16157-TF-001).</p> <p>The following five key elements for effective CM, per DOE-STD-1073-2016, were reviewed:</p> <p>Design Control, Work Control, Change Control, Document Control, and Assessments. This surveillance looked to ensure the basic objectives of CM were being applied. Specifically:</p> <ol style="list-style-type: none"> <li>1) Establish consistency among design requirements, physical configuration, and documentation (including analysis, drawings, and procedures) for the facility or activity; and</li> <li>2) Maintain this consistency throughout the life of the facility or activity, particularly as changes are being made.</li> </ol> <p>Executive Summary: The assessors noted that the Configuration Management (CM) program is adequately being managed by the Tank Operations Contractor, with the exception of two findings and nine opportunities for improvement. A summary of the issues are contained below, with the full description contained at the end of the discussion.</p> <p>This assessment is divided into two general areas: Processes that resides mostly within engineering (e.g., Design Control, Change Control and Document Control); and processes that reside mostly outside engineering and interfaces with those other organizations. While the Engineering Department is responsible for the CM program at WRPS, the program is heavily dependent on Maintenance and Operations to control and report the status of configuration of systems. The Engineering department seems to do a good job managing the components that are largely under their control, with a few minor issues. However, there are still concerns on how Maintenance and Operations interact with those CM systems (e.g., SECD/SPF) that engineering is mostly responsible for.</p>
3/6/2018	WRPS-PER-2018-0573	WRPS should consider requiring periodic system walk-downs by systems engineers	<p>Number and Title: 16157-TF WRPS Configuration Management</p> <p>Scope: Verify the WRPS configuration management program meet the requirements of the DOE order and standard that pertain to them and ensure processes are being implemented adequately, per DOE O 420.1 C, Nuclear Facility Safety and DOE-STD-1073-2003, Configuration Management. A CM program is a requirement of DOE O 420.1 C, Attachment 2, Chapter V, Paragraph 3.c. DOE-STD-1073-2003 is an acceptable method to meet this requirement, which WRPS has invoked in TFC-POL-07 and TFC-PLN-23.</p> <p>It is noted that the latest revision of DOE-STD-1073 (Configuration Management) was issued in December 2016, but the revision referenced in WRPS's Configuration Management Plan (TFCPLN-23) is the 2003 revision. Due to the fact that DOE-STD-1073 is not specifically listed in the TOC contract and it is considered a best practice to utilize the latest revision of a DOE standard, WRPS's Configuration Management procedure set was reviewed against the 2016 revision. Where discrepancies between the 2016 version and WRPS's procedures were identified, the requirements from the currently invoked 2003 version were also reviewed. Due to the fact that WRPS invokes a 15 year old revision of the Configuration Management DOE standard, reviewing and updating WRPS's procedures to invoke the 2016 revision is identified as an OFI (16157-TF-001).</p> <p>The following five key elements for effective CM, per DOE-STD-1073-2016, were reviewed:</p> <p>Design Control, Work Control, Change Control, Document Control, and Assessments. This surveillance looked to ensure the basic objectives of CM were being applied. Specifically:</p> <ol style="list-style-type: none"> <li>1) Establish consistency among design requirements, physical configuration, and documentation (including analysis, drawings, and procedures) for the facility or activity; and</li> <li>2) Maintain this consistency throughout the life of the facility or activity, particularly as changes are being made.</li> </ol> <p>Executive Summary: The assessors noted that the Configuration Management (CM) program is adequately being managed by the Tank Operations Contractor, with the exception of two findings and nine opportunities for improvement. A summary of the issues are contained below, with the full description contained at the end of the discussion.</p> <p>This assessment is divided into two general areas: Processes that resides mostly within engineering (e.g., Design Control, Change Control and Document Control); and processes that reside mostly outside engineering and interfaces with those other organizations. While the Engineering Department is responsible for the CM program at WRPS, the program is heavily dependent on Maintenance and Operations to control and report the status of configuration of systems. The Engineering department seems to do a good job managing the components that are largely under their control, with a few minor issues. However, there are still concerns on how Maintenance and Operations interact with those CM systems (e.g., SECD/SPF) that engineering is mostly responsible for.</p>
3/6/2018	WRPS-PER-2018-0574	TFC-PLN-23 should clearly define how WRPS meets DOE O 420.1 C	<p>Number and Title: 16157-TF WRPS Configuration Management</p> <p>Scope: Verify the WRPS configuration management program meet the requirements of the DOE order and standard that pertain to them and ensure processes are being implemented adequately, per DOE O 420.1 C, Nuclear Facility Safety and DOE-STD-1073-2003, Configuration Management. A CM program is a requirement of DOE O 420.1 C, Attachment 2, Chapter V, Paragraph 3.c. DOE-STD-1073-2003 is an acceptable method to meet this requirement, which WRPS has invoked in TFC-POL-07 and TFC-PLN-23.</p> <p>It is noted that the latest revision of DOE-STD-1073 (Configuration Management) was issued in December 2016, but the revision referenced in WRPS's Configuration Management Plan (TFCPLN-23) is the 2003 revision. Due to the fact that DOE-STD-1073 is not specifically listed in the TOC contract and it is considered a best practice to utilize the latest revision of a DOE standard, WRPS's Configuration Management procedure set was reviewed against the 2016 revision. Where discrepancies between the 2016 version and WRPS's procedures were identified, the requirements from the currently invoked 2003 version were also reviewed. Due to the fact that WRPS invokes a 15 year old revision of the Configuration Management DOE standard, reviewing and updating WRPS's procedures to invoke the 2016 revision is identified as an OFI (16157-TF-001).</p> <p>The following five key elements for effective CM, per DOE-STD-1073-2016, were reviewed:</p> <p>Design Control, Work Control, Change Control, Document Control, and Assessments. This surveillance looked to ensure the basic objectives of CM were being applied. Specifically:</p> <ol style="list-style-type: none"> <li>1) Establish consistency among design requirements, physical configuration, and documentation (including analysis, drawings, and procedures) for the facility or activity; and</li> <li>2) Maintain this consistency throughout the life of the facility or activity, particularly as changes are being made.</li> </ol> <p>Executive Summary: The assessors noted that the Configuration Management (CM) program is adequately being managed by the Tank Operations Contractor, with the exception of two findings and nine opportunities for improvement. A summary of the issues are contained below, with the full description contained at the end of the discussion.</p> <p>This assessment is divided into two general areas: Processes that resides mostly within engineering (e.g., Design Control, Change Control and Document Control); and processes that reside mostly outside engineering and interfaces with those other organizations. While the Engineering Department is responsible for the CM program at WRPS, the program is heavily dependent on Maintenance and Operations to control and report the status of configuration of systems. The Engineering department seems to do a good job managing the components that are largely under their control, with a few minor issues. However, there are still concerns on how Maintenance and Operations interact with those CM systems (e.g., SECD/SPF) that engineering is mostly responsible for.</p>

3/6/2018	WRPS- PER- 2018- 0575	WRPS should consider making other minor changes to TFC-PLN-23 for clarity	<p>Number and Title: 16157-TF WRPS Configuration Management</p> <p>Scope: Verify the WRPS configuration management program meet the requirements of the DOE order and standard that pertain to them and ensure processes are being implemented adequately, per DOE O 420.1 C, Nuclear Facility Safety and DOE-STD-1073-2003, Configuration Management. A CM program is a requirement of DOE O 420.1 C, Attachment 2, Chapter V, Paragraph 3.c. DOE-STD-1073-2003 is an acceptable method to meet this requirement, which WRPS has invoked in TFC-POL-07 and TFC-PLN-23.</p> <p>It is noted that the latest revision of DOE-STD-1073 (Configuration Management) was issued in December 2016, but the revision referenced in WRPS's Configuration Management Plan (TFCPLN-23) is the 2003 revision. Due to the fact that DOE-STD-1073 is not specifically listed in the TOC contract and it is considered a best practice to utilize the latest revision of a DOE standard, WRPS's Configuration Management procedure set was reviewed against the 2016 revision. Where discrepancies between the 2016 version and WRPS's procedures were identified, the requirements from the currently invoked 2003 version were also reviewed. Due to the fact that WRPS invokes a 15 year old revision of the Configuration Management DOE standard, reviewing and updating WRPS's procedures to invoke the 2016 revision is identified as an OFI (16157-TF-001).</p> <p>The following five key elements for effective CM, per DOE-STD-1073-2016, were reviewed:</p> <p>Design Control, Work Control, Change Control, Document Control, and Assessments. This surveillance looked to ensure the basic objectives of CM were being applied. Specifically:</p> <p>1) Establish consistency among design requirements, physical configuration, and documentation (including analysis, drawings, and procedures) for the facility or activity; and 2) Maintain this consistency throughout the life of the facility or activity, particularly as changes are being made.</p> <p>Executive Summary: The assessors noted that the Configuration Management (CM) program is adequately being managed by the Tank Operations Contractor, with the exception of two findings and nine opportunities for improvement. A summary of the issues are contained below, with the full description contained at the end of the discussion.</p> <p>This assessment is divided into two general areas: Processes that resides mostly within engineering (e.g., Design Control, Change Control and Document Control); and processes that reside mostly outside engineering and interfaces with those other organizations. While the Engineering Department is responsible for the CM program at WRPS, the program is heavily dependent on Maintenance and Operations to control and report the status of configuration of systems. The Engineering department seems to do a good job managing the components that are largely under their control, with a few minor issues. However, there are still concerns on how Maintenance and Operations interact with those CM systems (e.g., SECD/SPF) that engineering is mostly responsible for.</p>
3/6/2018	WRPS- PER- 2018- 0550	SX Construction Subcontractor cut a legacy utility line (Conduit) that contained electrical wires.	<p>Problem: SX Construction Subcontractor cut a legacy utility line (Conduit) that contained electrical wires. The wires were not energized with electrical power.</p> <p>4 legacy utility lines were identified as needing to be removed from our 18" drain piping profile via scanning, drawing review, crossing list formulation, excavation permit process prior to excavation. These lines were identified as 1 1/4" Instrument Air, 3" Process Air, 1 1/2" Raw Water per drawing H-2-39952 and 2" Raw water per drawing H-2-73208.</p> <p>These legacy utility lines had been exposed during initial hand excavation to install 18" diameter drain piping.</p> <p>Concern: Electrical conduit was not identified during the above review/investigation/excavation process.</p>
3/6/2018	WRPS- PER- 2018- 0576	Required Lessons Learned Were Not Reviewed During Documented Pre-Job Brief	<p>Title: Observed Removal of Camera from AX-102</p> <p>Summary: A documented prejob brief was conducted for WO 207096, 241-AX-102 install and Remove Camera(s) in Riser(s). Roles and responsibilities were covered and the field work supervisor covered the relevant tasks from the work package. The IHT briefed the IH sample plan, noting that monitoring and sampling would be required due to working in a VCZ around the riser. The HPT briefed the RWP and requirements for the various workers. The lessons learned were not covered. The FR reviewed the work instructions after the brief and noted that the two Lessons Learned were included for review. Further discussion with the supervisor determined that it was omitted due to the fact that the work package was a repetitive use work package that is used on an ongoing basis to install and remove numerous cameras. 35786-TF-F01.</p> <p>The performance of the task was conducted without complication. Workers removed the cords and camera into the preinstalled sleeving, and bagged it for re-use in the future. The FR observed radcon practices and observed that they went well. The work crew was wearing hard hats due to nearby crane work, and on occasion while working the hat would fall on the ground. The workers consistently conducted appropriate surveys before donning again.</p> <p>While construction activities were ongoing, the FR inspected the condition of the immediate area. In many of the adjacent VCZs, the FR observed qualitatively there was at least part of the VCZ boundary that did not meet the requirements in TFC-ESHQ-5_IH-C-48, Managing Tank Chemical Vapors, to post the boundary at least 5 feet from the source. In some instances, the boundary appeared close enough to the emission source that one could reach over the boundary and physically touch the source. While there were some instances where equipment configuration prevented posting a 5 foot barrier, in many instances it was achievable but not implemented. In response to these concerns, WRPS personnel inspected the VCZs in AX farm and verified that the boundaries had been shifted, and reestablished the proper boundaries. There was not an immediate consequence due to tank farm access being in accordance with the management directed use of supplied air. However, in the current configuration it is possible for an individual enter an area that is within the appropriate VCZ boundary without the requisite IHT coverage. Additionally, with ongoing efforts through third party analysis of air purifying respirator filter testing, with the possibility of relaxing the requirement for supplied air for some work activities, the proper maintenance of VCZs is essential. 35786-TF-F02 A</p> <p>After the work was complete, the FR also observed surveying practices and doffing of protective clothing at the change tent. HPT staff were not hesitant to provide the necessary coaching to other workers regarding survey practices in the instance that it was required. The FR noted no issues in that area.</p> <p>In response to the concerns above, the FR found that TFC-ESHQ-5_IH-C-48 Section 4.2 requires that permanent VCZ locations be recorded on the TVIS and on the TOC Industrial Hygiene Web Page. While reviewing these resources, the FR noted that the electronic map on the IH web page was not up to date, in that it did not reflect modifications to the tank ventilation resulting from the installation of the PGR-126/127 Exhausters. The TVIS located on the website did reflect this modification. 35786-TF-F03</p> <p>While reviewing the work package in the WORA system, the FR noted that the original package was developed in 2016, and had since undergone two WCNs. During that time, the TVIS for AX farm had been revised to reflect the changes to permanent VCZs resulting from the ventilation upgrades. However, the only TVIS attached to the WORA work package was the version in effect during original work package development.</p>

3/6/2018	WRPS- PER- 2018- 0577	Failure to Establish Vapor Control Zones In Accordance With Procedural Requirements	<p>Title: Observed Removal of Camera from AX-102</p> <p>Summary: A documented prejob brief was conducted for WO 207096, 241-AX-102 install and Remove Camera(s) in Riser(s). Roles and responsibilities were covered and the field work supervisor covered the relevant tasks from the work package. The IHT briefed the IH sample plan, noting that monitoring and sampling would be required due to working in a VCZ around the riser. The HPT briefed the RWP and requirements for the various workers. The lessons learned were not covered. The FR reviewed the work instructions after the brief and noted that the two Lessons Learned were included for review. Further discussion with the supervisor determined that it was omitted due to the fact that the work package was a repetitive use work package that is used on an ongoing basis to install and remove numerous cameras. 35786-TF-F01.</p> <p>The performance of the task was conducted without complication. Workers removed the cords and camera into the preinstalled sleeving, and bagged it for re-use in the future. The FR observed radcon practices and observed that they went well. The work crew was wearing hard hats due to nearby crane work, and on occasion while working the hat would fall on the ground. The workers consistently conducted appropriate surveys before donning again.</p> <p>While construction activities were ongoing, the FR inspected the condition of the immediate area. In many of the adjacent VCZs, the FR observed qualitatively there was at least part of the VCZ boundary that did not meet the requirements in TFC-ESHQ-5_IH-C-48, Managing Tank Chemical Vapors, to post the boundary at least 5 feet from the source. In some instances, the boundary appeared close enough to the emission source that one could reach over the boundary and physically touch the source. While there were some instances where equipment configuration prevented posting a 5 foot barrier, in many instances it was achievable but not implemented. In response to these concerns, WRPS personnel inspected the VCZs in AX farm and verified that the boundaries had been shifted, and reestablished the proper boundaries. There was not an immediate consequence due to tank farm access being in accordance with the management directed use of supplied air. However, in the current configuration it is possible for an individual enter an area that is within the appropriate VCZ boundary without the requisite IHT coverage. Additionally, with ongoing efforts through third party analysis of air purifying respirator filter testing, with the possibility of relaxing the requirement for supplied air for some work activities, the proper maintenance of VCZs is essential. 35786-TF-F02 A</p> <p>After the work was complete, the FR also observed surveying practices and doffing of protective clothing at the change tent. HPT staff were not hesitant to provide the necessary coaching to other workers regarding survey practices in the instance that it was required. The FR noted no issues in that area.</p> <p>In response to the concerns above, the FR noted that TFC-ESHQ-5_IH-C-48 Section 4.2 requires that permanent VCZ locations be recorded on the TVIS and on the TOC Industrial Hygiene Web Page. While reviewing these resources, the FR noted that the electronic map on the IH web page was not up to date, in that it did not reflect modifications to the tank ventilation resulting from the installation of the POR-126/127 Exhausters. The TVIS located on the website did reflect this modification. 35786-TF-F03</p> <p>While reviewing the work package in the WORA system, the FR noted that the original package was developed in 2016, and had since undergone two WCNs. During that time, the TVIS for AX farm had been revised to reflect the changes to permanent VCZs resulting from the ventilation upgrades. However, the only TVIS attached to the WORA work package was the version in effect during original work package development.</p>
3/6/2018	WRPS- PER- 2018- 0578	Permanent Vapor Control Zone Maps Not Maintained Up To Date	<p>Title: Observed Removal of Camera from AX-102</p> <p>Summary: A documented prejob brief was conducted for WO 207096, 241-AX-102 install and Remove Camera(s) in Riser(s). Roles and responsibilities were covered and the field work supervisor covered the relevant tasks from the work package. The IHT briefed the IH sample plan, noting that monitoring and sampling would be required due to working in a VCZ around the riser. The HPT briefed the RWP and requirements for the various workers. The lessons learned were not covered. The FR reviewed the work instructions after the brief and noted that the two Lessons Learned were included for review. Further discussion with the supervisor determined that it was omitted due to the fact that the work package was a repetitive use work package that is used on an ongoing basis to install and remove numerous cameras. 35786-TF-F01.</p> <p>The performance of the task was conducted without complication. Workers removed the cords and camera into the preinstalled sleeving, and bagged it for re-use in the future. The FR observed radcon practices and observed that they went well. The work crew was wearing hard hats due to nearby crane work, and on occasion while working the hat would fall on the ground. The workers consistently conducted appropriate surveys before donning again.</p> <p>While construction activities were ongoing, the FR inspected the condition of the immediate area. In many of the adjacent VCZs, the FR observed qualitatively there was at least part of the VCZ boundary that did not meet the requirements in TFC-ESHQ-5_IH-C-48, Managing Tank Chemical Vapors, to post the boundary at least 5 feet from the source. In some instances, the boundary appeared close enough to the emission source that one could reach over the boundary and physically touch the source. While there were some instances where equipment configuration prevented posting a 5 foot barrier, in many instances it was achievable but not implemented. In response to these concerns, WRPS personnel inspected the VCZs in AX farm and verified that the boundaries had been shifted, and reestablished the proper boundaries. There was not an immediate consequence due to tank farm access being in accordance with the management directed use of supplied air. However, in the current configuration it is possible for an individual enter an area that is within the appropriate VCZ boundary without the requisite IHT coverage. Additionally, with ongoing efforts through third party analysis of air purifying respirator filter testing, with the possibility of relaxing the requirement for supplied air for some work activities, the proper maintenance of VCZs is essential. 35786-TF-F02 A</p> <p>After the work was complete, the FR also observed surveying practices and doffing of protective clothing at the change tent. HPT staff were not hesitant to provide the necessary coaching to other workers regarding survey practices in the instance that it was required. The FR noted no issues in that area.</p> <p>In response to the concerns above, the FR noted that TFC-ESHQ-5_IH-C-48 Section 4.2 requires that permanent VCZ locations be recorded on the TVIS and on the TOC Industrial Hygiene Web Page. While reviewing these resources, the FR noted that the electronic map on the IH web page was not up to date, in that it did not reflect modifications to the tank ventilation resulting from the installation of the POR-126/127 Exhausters. The TVIS located on the website did reflect this modification. 35786-TF-F03</p> <p>While reviewing the work package in the WORA system, the FR noted that the original package was developed in 2016, and had since undergone two WCNs. During that time, the TVIS for AX farm had been revised to reflect the changes to permanent VCZs resulting from the ventilation upgrades. However, the only TVIS attached to the WORA work package was the version in effect during original work package development.</p>
3/6/2018	WRPS- PER- 2018- 0580	WRPS Should Evaluate the Work Change Notice Process to Incorporate Revisions to Supporting Documents	<p>Title: Observed Removal of Camera from AX-102</p> <p>Summary: A documented prejob brief was conducted for WO 207096, 241-AX-102 install and Remove Camera(s) in Riser(s). Roles and responsibilities were covered and the field work supervisor covered the relevant tasks from the work package. The IHT briefed the IH sample plan, noting that monitoring and sampling would be required due to working in a VCZ around the riser. The HPT briefed the RWP and requirements for the various workers. The lessons learned were not covered. The FR reviewed the work instructions after the brief and noted that the two Lessons Learned were included for review. Further discussion with the supervisor determined that it was omitted due to the fact that the work package was a repetitive use work package that is used on an ongoing basis to install and remove numerous cameras. 35786-TF-F01.</p> <p>The performance of the task was conducted without complication. Workers removed the cords and camera into the preinstalled sleeving, and bagged it for re-use in the future. The FR observed radcon practices and observed that they went well. The work crew was wearing hard hats due to nearby crane work, and on occasion while working the hat would fall on the ground. The workers consistently conducted appropriate surveys before donning again.</p> <p>While construction activities were ongoing, the FR inspected the condition of the immediate area. In many of the adjacent VCZs, the FR observed qualitatively there was at least part of the VCZ boundary that did not meet the requirements in TFC-ESHQ-5_IH-C-48, Managing Tank Chemical Vapors, to post the boundary at least 5 feet from the source. In some instances, the boundary appeared close enough to the emission source that one could reach over the boundary and physically touch the source. While there were some instances where equipment configuration prevented posting a 5 foot barrier, in many instances it was achievable but not implemented. In response to these concerns, WRPS personnel inspected the VCZs in AX farm and verified that the boundaries had been shifted, and reestablished the proper boundaries. There was not an immediate consequence due to tank farm access being in accordance with the management directed use of supplied air. However, in the current configuration it is possible for an individual enter an area that is within the appropriate VCZ boundary without the requisite IHT coverage. Additionally, with ongoing efforts through third party analysis of air purifying respirator filter testing, with the possibility of relaxing the requirement for supplied air for some work activities, the proper maintenance of VCZs is essential. 35786-TF-F02 A</p> <p>After the work was complete, the FR also observed surveying practices and doffing of protective clothing at the change tent. HPT staff were not hesitant to provide the necessary coaching to other workers regarding survey practices in the instance that it was required. The FR noted no issues in that area.</p> <p>In response to the concerns above, the FR noted that TFC-ESHQ-5_IH-C-48 Section 4.2 requires that permanent VCZ locations be recorded on the TVIS and on the TOC Industrial Hygiene Web Page. While reviewing these resources, the FR noted that the electronic map on the IH web page was not up to date, in that it did not reflect modifications to the tank ventilation resulting from the installation of the POR-126/127 Exhausters. The TVIS located on the website did reflect this modification. 35786-TF-F03</p> <p>While reviewing the work package in the WORA system, the FR noted that the original package was developed in 2016, and had since undergone two WCNs. During that time, the TVIS for AX farm had been revised to reflect the changes to permanent VCZs resulting from the ventilation upgrades. However, the only TVIS attached to the WORA work package was the version in effect during original work package development.</p>

3/6/2018	WRPS- PER- 2018- 0581	Data Sheet Calculation Is Not Clearly Explained in Procedure	<p>Title: (Backshift) Performed Oversight of Transfer from AP-106 to AW-106</p> <p>Summary: Performed Oversight of Transfer from AP-106 to AW-106 on 02/16/18.</p> <hr/> <p>Issue Type: Finding (Level 3) Significance Level: 2 Statement: Data Sheet Calculation Is Not Clearly Explained in Procedure Discussion: While performing oversight of a transfer from AP-106 to AW-106, the FR noted that a calculation was not clearly explained. TO-230-345, Transfer From 241-AP-106 to 241-AW-106, Revision A-0, Data Sheet 2, Intermediate Transfer Material Balance, has a calculation to determine AP-106 supernate pump flowrate. <math>Flow = (B[previous] - B[current]) / Pump\ Run\ Time[minutes]</math>, where 'B' is the sending tank volume. The term 'Pump Run Time' is not defined or labeled in the data sheet. 'Pump Run Time' is calculated by summing all of the minutes that the pump was running, while taking into account any stoppage time between readings; again there is no explanation of how to do this in the procedure, nor is there a space to record 'Pump Run Time'. The tank volume delta is then divided by 'Pump Run Time' to calculate flow.</p> <p>Additionally, near the top of the data sheet, the time between readings is calculated by taking the number of minutes since the last reading and dividing by 60 to convert to hours; this calculation is not explained in the procedure. Failure to provide space to record calculation inputs and failure to clearly explain calculations in procedures has the potential to cause errors in calculations.</p> <p>Requirements: TFC-PLN-05, Conduct of Operations Implementation Plan, Revision F-7, Attachment A, Requirement 2.p.(3), detailed attribute m, states, "Procedures contain explicit parameters and do not require mental arithmetic to determine acceptability. Any calculations are clearly explained and procedures provide space to record them."</p> <p>Funct. Area: OPS Trend Code: Operations-PROCS; ISMS Funct.:IDHAZ; Causal Code:A582; Issue Number: 16358</p> <p>REF: TOD Weekly 2-19-18; B Reyes; Finding Level 3; OA35835</p>																					
3/6/2018	WRPS- PER- 2018- 0582	Entry Approach to Radiation Area/Contamination Area Not Posted With Physical Barrier	<p>Title: Performed Oversight of AX-102 Riser 5B Pump Oil Drain Preparation</p> <p>Summary: Performed oversight of AX-102A riser 5B pump oil drain preparation on 02/22/18.</p> <hr/> <p>Issue Type: Finding (Level 3) Significance Level: 2 Statement: Entry Approach to Radiation Area/Contamination Area Not Posted With Physical Barrier Discussion: While performing a walkdown of RMA-012 during AX-102 riser 5B pump oil drain preparation, the FR noted that a portion of the work area was not posted as a CA/RA. The north and east sides of the work area were established with stacked concrete barriers approximately 4' high. Yellow and magenta rope with CA/RA signs were hung on the concrete barriers, except for approximately 8' of length in the northeast corner of the work area where no signs or rope were posted. The FR pointed the non-posted area out to HPTs, and confirmed the following day that HPTs posted the area as a CA/RA Failure to post all entry approaches with appropriate radiological postings has the potential for an individual to gain access to a controlled area without adequate controls and monitoring in place.</p> <p>Requirements: HNF-5183, Tank Farm Radiological Control Manual, Revision 05M, Article 231, Posting Requirements, Step 10 states, "Physical barriers shall [835.501(c)(1), 835.601(b)] be placed so that they are clearly visible from all entry approaches. [RPP # 109 &amp; 128]."</p> <p>Funct. Area: RADCON; Trend Code:Radiological Control-PSTG5; ISMS Funct.:IDHAZ; Causal Code:A384; Issue 16362</p> <p>REF: TOD Weekly 2-19-18; B Reyes; Finding Level 3; OA35860</p>																					
3/6/2018	WRPS- PER- 2018- 0562	Several DOE Orders referenced not up to date	<p>Several DOE Orders referenced in HNF-5183, Tank Farm Radiological Control Manual and HNF-MP-5184, Washington River Protection Solutions LLC Radiation Protection Program were not up-to-date. These include the following:</p> <table border="1"> <thead> <tr> <th>DOE Order#</th> <th>WRPS Reference</th> <th>Comment</th> </tr> </thead> <tbody> <tr> <td>DOE O 460.1B</td> <td>FRCM Art. 423</td> <td>Current order revision is DOE O 460.1C</td> </tr> <tr> <td>DOE O 451.1B</td> <td>FRCM Art. 451</td> <td>Current order revision is DOE O 451.1B</td> </tr> <tr> <td>DOE O 414.1C</td> <td>FRCM Art. 743</td> <td>Current order revision is DOE O 414.1D</td> </tr> <tr> <td>DOE O 231.1-1A</td> <td>FRCM Art. 721, 782</td> <td>Current order revision is DOE O 231.1B</td> </tr> <tr> <td>DOE M 231.1-2B</td> <td>FRCM Art. 127</td> <td>This manual has been canceled</td> </tr> <tr> <td>DOE O 421.1B</td> <td>RPP, Table 2</td> <td>This order was replaced by 10 CFR 830</td> </tr> </tbody> </table>	DOE Order#	WRPS Reference	Comment	DOE O 460.1B	FRCM Art. 423	Current order revision is DOE O 460.1C	DOE O 451.1B	FRCM Art. 451	Current order revision is DOE O 451.1B	DOE O 414.1C	FRCM Art. 743	Current order revision is DOE O 414.1D	DOE O 231.1-1A	FRCM Art. 721, 782	Current order revision is DOE O 231.1B	DOE M 231.1-2B	FRCM Art. 127	This manual has been canceled	DOE O 421.1B	RPP, Table 2	This order was replaced by 10 CFR 830
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DOE M 231.1-2B	FRCM Art. 127	This manual has been canceled																						
DOE O 421.1B	RPP, Table 2	This order was replaced by 10 CFR 830																						

3/6/2018	WRPS-PER-2018-0583	Work Instructions Not Performed As Written	<p>Title: (Backshift) Performed Oversight of AX-102 Riser 5B Pump Oil Drain</p> <p>Summary: FR performed a walkdown of the work area and noted that HPTs fixed the RA/CA posting that the FR had identified the day prior (the FR found that a portion of the area was not posted as a RA/CA). The FR then received a brief from the FWS and entered the work area.</p> <p>Prior to the FR entering the work area within RMA-012, the crew drilled a hole into the side of the pump and applied Versi-Foam into the drilled hole. The FR observed the crew rotate the pump and drill a second hole, and then the crew waited to allow oil to drain into the catch pan. After 15 minutes, the crew used a peristaltic pump to transfer the catch pan contents into a sample container that was in a glove bag resting on the ground. Workers performed an inspection of the catch pan with a borescope and subsequently repositioned the suction and restarted the peristaltic pump. The FR noted that the liquid being pumped from the catch pan flowed like water and did not leave behind an oily film within the Tygon tube.</p> <p>Absorbent material was added into the shield box to absorb remaining catch pan contents, and then workers applied Versi-Foam inside of the shield box to stabilize equipment. Workers then sleeved equipment out of the glove bag for reuse, applied fixative inside of the glove bag, and began collapsing the glove bag onto the shield box. The FR noted that a worker sleeved out the drill press chuck key while the glove bag was being collapsed (16361, L3 Finding). The FWS made the decision to not lift the weather enclosure and place it outside of RMA-012 since the wind was picking up.</p> <p>-----</p> <p>Issue Type: Finding (Level 3) Significance Level: 2 Statement: Work Instructions Not Performed As Written</p> <p>Discussion: While executing work order 290128, 241-AX, Dispose of AX-102/05A/05B Pump and Remove Liquids, WCN-02, the work instructions were not performed as written. The pump oil drain in RMA-012 was complete, and workers were in the process of breaking down the work area. Step 5.22.33 states, "Sleeve out equipment for re-use." Workers removed equipment from the glove bag and then moved on to step 5.22.34 which states, "Apply fixative inside glove bag." After fixative was applied, workers were in the process of performing step 5.22.35, "Collapse glove bag onto the shield box" when a worker noticed that the drill press chuck key was still in the glove bag. The worker notified the FWS and then sleeved out the chuck key for reuse, and then workers continued to collapse the glove bag per step 5.22.35.</p> <p>The FR reviewed the work instructions and noted that there is no exception that allows steps 5.22.33, 5.22.34, or 5.22.35 to be performed out of sequence; therefore, the steps are required to be executed sequentially. The FR discussed the work instruction adherence with the FWS who was very receptive to feedback. Performing steps out of sequence has the potential to expose workers to hazards or damage equipment.</p>
3/6/2018	WRPS-PER-2018-0584	Contrary to the requirements of 10 C.F.R. 830 Subpart B, section 203(g)(4), operational	<p>Title: Review of Evaluation of the Safety of the Situation (ESS) for PISA on Flammable Sample Line Purge Times</p> <p>Summary: A DOE review of the ESS for the PISA on Flammable Sample Line Purge Times was conducted by a qualified ORP Nuclear Safety Specialist. The ESS was determined to be correct in its conclusions and adequate to support the removal of operational restrictions associated with the declared Potential Inadequacy in the Safety Analysis (PISA). A finding and an observation were noted.</p> <p>Background: On November 30, 2017 an error associated with flammable gas sampling purge time calculations was discovered and entered into the contractor's PER system. At that time, operational restrictions were put into place restricting electronic access to the sampling procedure and producing a redline change to the controlled version of the procedure to be used. The sample purge time in the procedure was changed via redline from 50 seconds to 300 seconds. The on-call DOE Facility Representative was notified of the condition at that time and a recommendation for a PISA determination was entered into the PER system.</p> <p>On December 4, a Red Arrow was issued increasing the purge time to 11 minutes and 30 seconds.</p> <p>On December 5, the Plant Review Committee (PRC) formally declared the PISA. At the same time, an ongoing extent of conditions review of the issue discovered additional errors in the purge time calculation based on a previous change in sampling equipment. The PRC determined that meeting specific TSRs for flammable gas sampling was an area of concern. Based on an initial draft of a calculation, the PRC amended the existing Red Arrow to reduce sample purge time requirements for a subset of the affected tanks.</p> <p>On December 7, the sampling procedure was revised and released for use with updated purge times. On December 19, the Red Arrow was amended again without impact to the operational restrictions. The ESS and negative USQ determination was submitted to DOE via letter on February 1, 2018.</p>
3/6/2018	WRPS-PER-2018-0585	Determination of potentially missed TSR surveillance requirements lacked formality.	<p>Title: Review of Evaluation of the Safety of the Situation (ESS) for PISA on Flammable Sample Line Purge Times</p> <p>Summary: A DOE review of the ESS for the PISA on Flammable Sample Line Purge Times was conducted by a qualified ORP Nuclear Safety Specialist. The ESS was determined to be correct in its conclusions and adequate to support the removal of operational restrictions associated with the declared Potential Inadequacy in the Safety Analysis (PISA). A finding and an observation were noted.</p> <p>Background: On November 30, 2017 an error associated with flammable gas sampling purge time calculations was discovered and entered into the contractor's PER system. At that time, operational restrictions were put into place restricting electronic access to the sampling procedure and producing a redline change to the controlled version of the procedure to be used. The sample purge time in the procedure was changed via redline from 50 seconds to 300 seconds. The on-call DOE Facility Representative was notified of the condition at that time and a recommendation for a PISA determination was entered into the PER system.</p> <p>On December 4, a Red Arrow was issued increasing the purge time to 11 minutes and 30 seconds. On December 5, the Plant Review Committee (PRC) formally declared the PISA. At the same time, an ongoing extent of conditions review of the issue discovered additional errors in the purge time calculation based on a previous change in sampling equipment. The PRC determined that meeting specific TSRs for flammable gas sampling was an area of concern. Based on an initial draft of a calculation, the PRC amended the existing Red Arrow to reduce sample purge time requirements for a subset of the affected tanks.</p> <p>On December 7, the sampling procedure was revised and released for use with updated purge times. On December 19, the Red Arrow was amended again without impact to the operational restrictions. The ESS and negative USQ determination was submitted to DOE via letter on February 1, 2018.</p>

3/6/2018	WRPS-PER-2018-0586	Out-of-Date Emergency Response Procedure Posted in the A/AX Change Tent	<p>Title: Observed the Removal of the AX-102 Saltwell Pump</p> <p>Summary: TODD observed the removal of the AX-102 saltwell pump. The evolution was observed with FR Reyes. The removal went relatively well. Rad release was found to be adequate. Rad practices in the farm were observed to be adequate. The Rad map in the change tent was very weak and inadequate. Contamination information was non-existent. Dose rates were present on some tanks but were difficult to read because of pink marker ink being placed on pink colored tanks. The signature blocks were entered on masking tape.</p> <p>Additionally, TF-ERP-013 was posted in the change tent. The copy present was Rev. O-0 dated 8/18/2016. The most recent version was found to be Rev O-4 dated 1/10/2018. This is an OFI with direction given to review all change trailers/tents to be sure all procedures posted are up-to-date.</p> <hr/> <p>Issue Type: OFI (Opportunity for Improvement) Significance Level: 0</p> <p>Statement: Out-of-Date Emergency Response Procedure Posted in the A/AX Change Tent</p> <p>Discussion: On 2/1/2018, during oversight of the AX-102 saltwell pump removal, procedures that were posted in the change tent were reviewed. TF-ERP-013, Emergency Response Procedure 013, Tank Farm Worker Emergency Response, was present and was found to be out-of date. The copy present was Rev. O-0 dated 8/18/2016. The most recent version was found to be Rev. O-4 dated 1/10/2018.</p> <p>WRPS should review all change trailers and tents and ensure that all posted procedures are the most current version and develop a process to ensure that posted procedures are maintained up-to-date. TFC-PLN-05, Conduct of Operations Implementation Plan, Rev. F-6, takes credit in TFC-OPS-OPER-C-13, Technical Procedure Control and Use for implementation of this requirement. TFC-OPS-OPER-C-13 does not have a process for controlling posted copies of procedures such as that discovered in the A/AX change tent.</p> <p>Funct. Area: OPS; Trend Code:Operations-PROCS; ISMS Funct.:WORK Causal Code:N/A; Issue Number: 6318</p>
3/6/2018	WRPS-PER-2018-0565	concerns raised with the AY/AZ Recirculation Modules	<p>This PER is initiated to resolve components of Corrective Action WRPS-PER-2014-0871.1. This scope of this corrective action addresses over 70 different issues and will be broken into task specific PERs to make resolution of these issues manageable and more easily tracked to closure.</p> <p>This specific PER addresses concerns raised with the AY/AZ Recirculation Modules. The scope involves replacing recirculation fans AY101-K4-S-1; AZ101K4-S-1; and AZ102-K4-S-1 with spool pieces, and discontinuing their associated PMIDs (ET-007076; ET-007074; and ET-007077).</p>
3/6/2018	WRPS-PER-2018-0587	Personally owned electric car plugged into rental generator	<p>When performing a review of utilization of rental equipment in 200E in the area W of 218A (Construction Subcontractor Trailer), I identified that an employee had plugged their electric personally owned vehicle (POV) into a WRPS rental generator, which was provided by WRPS to power the subcontractor trailer.</p>

3/7/2018	WRPS- PER- 2018- 0588	Troemner Metric Weight Set	Troemner Metric Weight Set, Model # N/A, Serial #94011 (M&TE # 702-86-02-024). Energy Northwest sent an email informing us that they had some paper work errors with their calculations resulting in a Fail for 2014, 2015 and 2016 instead of a Pass. For 2017 weight set was a Pass. This has resulted in a NOD to reflect the previous calibrations.
3/8/2018	WRPS- PER- 2018- 0590	Bios Defender Primary Flowmeter	Bios Defender Primary Flowmeter, Model # Defender 510-H, Serial # 136911 (M&TE # 817-28-03-041) "As Found" reading during calibration was Out-of-Tolerance. It was sent to manufacturer for repair and adjusted to manufacturer spec.
3/8/2018	WRPS- PER- 2018- 0591	ATI Aerosol Photometer	ATI Aerosol Photometer, Model#2HA-N, Serial # 18897 (M&TE# 817-23-10-007) "As Found" reading during calibration was Out- of Tolerance. Item was repaired and adjusted to manufacturer spec.

3/8/2018	WRPS-PER-2018-0593	STAAD.Pro Software	Code checking of a Steel Member assigned with a Rectangular Hollow Section (HSS), designed in accordance to CSA S16-09 Code, the calculation of Shear Area in both the axes and the corresponding Shear Capacity values, may produce erroneous results.
3/8/2018	WRPS-PER-2018-0594	222-5 Data Accuracy	Whenever temperature measurements affect the quality of data obtained from specific laboratory measurement systems, the governing laboratory procedures are required to include steps that ensure sufficient temperature accuracy and precision. Currently the viscosity measurements are being taken and reported with temperatures that are measured by an electronic temperature probe contained within a sample jacket in the hot cell. The temperature is being maintained constant by water that is circulated from a thermostatic water bath outside of the hot cell, however, the water bath temperature is not being checked with a NIST traceable thermometer to determine the accuracy of the electronic temperature probe. Procedure ATS-LT-519-106, Rev. H-0, "222-5 Laboratory Rheology Measurements Within The 11A Hot Cells Using The HAAKE M5 Viscometer" does not contain any steps to verify the accuracy or precision of the electronic temperature probe in the sample jacket. (ATS-MP-1032, Rev. D-10, "222-5 Laboratory Quality Assurance Program Plan", Section 7.2.2)
3/8/2018	WRPS-PER-2018-0595	222-5 Time Lacking in Lab Notebooks	Analysis times are part of the required information to be added to the laboratory notebook in order to aid in validating the associated data and reconstructing the analysis if needed. Laboratory notebooks HNF-N-153-1 and HNF-N-894-1 were found to not have the viscosity analysis times recorded. (ATS-LT-519-106, Rev. H-0, "222-5 Laboratory Rheology Measurements Within The 11A Hot Cells Using The HAAKE M5 Viscometer", Section 8.1.41)

3/8/2018	WRPS-PER-2018-0596	Annual independent notebook reviews are not being performed	Notebook reviews are to be performed at least every 12 months for scientific coherency and consistency. The reviewer is normally the First Line Manager, but can be a delegate. The Reviewer may not review his/her own work. Annual independent notebook reviews are not being performed on viscosity notebooks HNF N-153-1 and HNF-N-894-1. The last review noted was on 7/24/16. (ATS-310, Section 2.32, Rev. E-0, "Laboratory Notebooks", Paragraphs 3.3 and 4.6)
3/8/2018	WRPS-PER-2018-0597	222-S Logbook Accuracy	Analytical reports must include references to the location where the raw data supporting the report are maintained, including notebook numbers and the name and location of the project file. This information is not included in report WRPS-1703397, Rev. 0, "Viscosity Analysis Results for April 2016 Tank 241-AN-101 Grab Samples." Prior to the completion of this surveillance the viscosity analyst added the notebook number to WRPS-1703397, Rev. 1. Also, the project coordinator completed Form A-6006-872, "Solid Phase Characterization Analysis Tracking" which includes the procedure number, notebook number, analysis date, analyst, and location of the raw data. WRPS-1703397, Rev. 1 and the completed Form A-6006-872 have been placed in the AN-101 Viscosity Testing February 2017 folder in the Spectral share drive, however, these documents need to be finalized and then placed in the project file records in IDMS. (ATS-MP-1032, Rev. D-10, "222-S Laboratory Quality Assurance Program Plan", Section 9.1 and ATS-310, Section 1.43, Rev. D-2, "222-S Analytical Process Flow", Paragraph 4.3.3)
3/8/2018	WRPS-PER-2018-0598	222-S Data Accuracy	A review of WRPS-1703397, Rev. 0, "Viscosity Analysis Results for April 2016 Tank 241-AN-101 Grab Samples" and associated raw data reveals that 65.5 °C is given as the measurement temperature for samples S17R000132 and S17R000133 in the report, however, 60.5 °C has been entered as the measurement temperature for the run data, flow curves, and viscosity curves in the spreadsheet raw data for these samples. Prior to the completion of this surveillance it was determined that sample S17R000132 was analyzed at 60.5 °C indicating an error in the report and sample S17R000133 was analyzed at 65.5 °C indicating an error in the raw data. The report correction for sample S17R000132 was made in WRPS-1703397, Rev. 1 and the raw data correction for sample S17R000133 was made in file S17R000133_65-S. WRPS-1703397, Rev. 1 and file S17R000133_65-S have been placed in the AN-101 Viscosity Testing February 2017 folder in the Spectral share drive, however, these documents need to be finalized and then placed in the project file records in IDMS.

3/8/2018	WRPS- PER- 2018- 0599	WO-207096	Review of work package WO-207096 showed the following "Ref 2-MISC-049 table 7, included in the work package". This procedure was just updated to remove the tables. Therefore this work package is incorrect and needs to be changed.
3/8/2018	WRPS- PER- 2018- 0600	Work Order 377475	Work Order 377475 was performed using PMID EE-108965, which includes a data sheet that lists a table of components to be inspected and their respective isolation valves. The data sheet table does not give direction to configure the isolation valves, nor restore their configuration when the inspection is completed.
3/8/2018	WRPS- PER- 2018- 0579	outside SX Farm excessive water	While Drilling into raw water line just outside SX Farm excessive water was encountered (Approx. 7-10 Gal.). water flowed like a fountain according to work crew for several minutes. all water remained inside posted CA but wasn't contained inside Drape HCA.

3/11/2018	WRPS- PER- 2018- 0601	K-2-5-3 Fan will not start due to fault condition.	K-2-5-3 Fan will not start due to fault condition.
3/11/2018	WRPS- PER- 2018- 0602	242-A Valve 5-54 Leaking at Packing	Valve 5-54 Leaking at Packing
3/12/2018	WRPS- PER- 2018- 0603	EAPC Safety Walk Down it was documented that there are 4 broken/cracked windows in MO-734/200E	During a Retrieval Projects EAPC Safety Walk Down it was documented that there are 4 broken/cracked windows in MO-734/200E, located southwest of 2704HV/200E. The windows have been documented as broken for approximately 6 months during EAPC Safety Walk Downs and reported to the help desk. Unfortunately the issue is ongoing. The broken windows create a potential injury risk if someone was to put pressure against one of these windows injuring personnel inside the facility and personnel that were standing nearby outside. Refer to Surveillance Report 45664.

3/12/2018	WRPS-PER-2018-0605	postings have been removed at FCA W-80-048 2707-SX shop AC unit and FCA W-80-007 216-U-PL manhole cover.	postings have been removed at FCA W-80-048 2707-SX shop AC unit and FCA W-80-007 216-U-PL manhole cover.
3/12/2018	WRPS-PER-2018-0606	Recirculation pumps AZ-CW-P-1A and AZ-CW-P-1B do not currently have PMs to ensure their continued reliable operation.	Recirculation pumps AZ-CW-P-1A and AZ-CW-P-1B do not currently have PMs to ensure their continued reliable operation. This PER is initiated to resolve components of Corrective Actions WRPS-PER-2014-0871.1 and WRPS-PER-2014-0871.2. This scope of this corrective action addresses over 70 different issues and will be broken into task specific PERs to make resolution of these issues manageable and more easily tracked to closure.
3/12/2018	WRPS-PER-2018-0607	Relief valves PCV-AZCWS-1 and RV-AZCWS-1 do not currently have PMs to ensure their continued reliable operation.	Relief valves PCV-AZCWS-1 and RV-AZCWS-1 do not currently have PMs to ensure their continued reliable operation. This PER is initiated to resolve components of Corrective Actions WRPS-PER-2014-0871.1 and WRPS-PER-2014-0871.2. This scope of this corrective action addresses over 70 different issues and will be broken into task specific PERs to make resolution of these issues manageable and more easily tracked to closure.

3/12/2018	WRPS-PER-2018-0608	AZ Qtrly VOC and Ammonia sampling requirements	<p>PMID ET-006987 (296-A-42 Quarterly VOC Sampling) and ET-106453 (296-A-42 Quarterly Ammonia Sample) no longer comply with non-radioactive sampling requirements of 296-A-42 per NOC DE11NWP-001. Both PMIDs are now inactive. Sampling is currently being performed on a repetitive work order (382350) until new sampling methods are implemented based on practical experience established with AP Primary ventilation sampling.</p> <p>This PER is initiated to resolve components of Corrective Actions WRPS-PER-2014-0871.1 and WRPS-PER-2014-0871.2. This scope of this corrective action addresses over 70 different issues and will be broken into task specific PERs to make resolution of these issues manageable and more easily tracked to closure.</p>
3/13/2018	WRPS-PER-2018-0604	Turnover sheets, are they records?	<p>Are Turnover Sheets record material? Which Turnover Sheets are record material? If common Operator turnovers are not record, would MBD Operator turnover be record as it is only performed during a transfer? See attached turnover examples.</p> <p>The Performance Assurance Record Review has been inconsistently receiving turnover sheets from various teams for review. Some teams only submit SM turnovers or OE turnovers as records while other teams also submit Operator turnovers as record. If turnovers are being submitted as record, Records Management and Procedures requirements shall be followed in the development and completion of the turnover sheets: all blank spaces require data or shall be lined through or N/A. Signature lines shall have space for printed name and date of signature, time if necessary. While documenting an action as non-trivial as operator turnover may not seem to produce record material, traceability of task performance should be documented in the event that identification of those performing the task or who is on duty is required. If turnover sheets are being completed and signed by operators, shouldn't that constitute record material?</p>
3/13/2018	WRPS-PER-2018-0543	Portable exhaustor POR126 (296-P-49) experienced an unplanned shutdown	<p>Portable exhaustor POR126 (296-P-49) experienced an unplanned shutdown due to a high differential pressure reading across the first HEPA filter.</p>

3/13/2018	WRPS- PER- 2018- 0592	exceeded RWP-WTP-0433 void limit for Total Soil Contamination	While performing direct surveys inside 241-SX farm to pre-survey vehicle travel path, HPT identified soil contamination in a localized area in the east side of the farm reading 16mRem/hr (corrected open window). This level exceeded RWP-WTP-0433 void limit for Total Soil Contamination of greater than or equal to 500,000 dpm/probe area beta gamma. No detectable alpha was noted.
3/13/2018	WRPS- PER- 2018- 0609	Five QA Surveillances were not retrievable by users in the IDMS	<p>Five QA Surveillances were not retrievable by users in the IDMS, after being scanned and submitted between August 2017 and February 2018.</p> <ul style="list-style-type: none"> <li>- TF-17-QSR-155, signed-off 08/22/2017</li> <li>- TF-17-QSR-171, signed-off 08/15/2017</li> <li>- TF-17-QSR-195, signed-off 10/09/2017</li> <li>- TF-17-QSR-251, signed-off 11/29/2017</li> <li>- TF-18-QSR-032, signed-off 02/15/2018</li> </ul> <p>Quality Surveillance Report (QSR) Coordinator places the original Quality Surveillance Report in the Quality Assurance Records Storage Area until the report can be scanned and entered into IDMS in accordance with TFC-BSM-IRM_DC-C-02. The QSR listed above were process as required by the QA Surveillance Report Coordinator.</p>
3/13/2018	WRPS- PER- 2018- 0610	OBSERVATION #1 – ECN-14-000877, ECN-711656, and ECN-713742 are not viewable as either a native or PDF file in Smart Plant	<p>OBSERVATION #1 – ECN-14-000877, ECN-711656, and ECN-713742 are not viewable as either a native or PDF file in Smart Plant Foundation.</p> <p>Generally, there was good agreement between Engineering and the reviewer on application of an 'E' approval designator to Engineering Change Notice (ECN) or Modification Traveler (MT). The significant differences for the Double-Shell Tank (DST) and Single-Shell Tank (SST) facilities is due to different factors. For the DST it is due to the large amount of detail contained within the Part B RCRA Permit Application. The increased detail is why the reviewer believes more ECN/MT needed the 'E' approval designator to assure a change did not involve an update to the permit application. As negotiations proceed on the draft Revision 9 of the RCRA permit the U.S. Department of Energy has committed to Ecology to keep the Part B permit application current. The difference for the SST is the result of Engineering using the TOC-ENG-DESIGN-C-52, Attachment D, Risk Screen - Environmental to identify what ECN/MT might have an Environmental risk and consult with Environmental early in the process to identify if an 'E' designator was needed to meet the Table 1 criteria of TOC-ENG-DESIGN-C-52. The reviewer just used the Table 1 criteria</p>

3/13/2018	WRPS- PER- 2018- 0611	222-A MOP- 2018-0770 Observation #2	<p>OBSERVATION #2 – ECN-10791 &amp; 107916 have the ECN number as the document Title in Smart Plant Foundation. Suggest title for both be "Electrical Changes in Room 4 HVAC at 222-S.</p> <p>Generally, there was good agreement between Engineering and the reviewer on application of an 'E' approval designator to Engineering Change Notice (ECN) or Modification Traveler (MT). The significant differences for the Double-Shell Tank (DST) and Single-Shell Tank (SST) facilities is due to different factors. For the DST it is due to the large amount of detail contained within the Part B RCRA Permit Application. The increased detail is why the reviewer believes more ECN/MT needed the 'E' approval designator to assure a change did not involve an update to the permit application. As negotiations proceed on the draft Revision 9 of the RCRA permit the U.S. Department of Energy has committed to Ecology to keep the Part B permit application current. The difference for the SST is the result of Engineering using the TOC-ENG-DESIGN-C-52, Attachment D, Risk Screen - Environmental to identify what ECN/MT might have an Environmental risk and consult with Environmental early in the process to identify if an 'E' designator was needed to meet the Table 1 criteria of TOC-ENG-DESIGN-C-52. The reviewer just used the Table 1 criteria</p>
3/13/2018	WRPS- PER- 2018- 0612	OBSERVATIO N #3 – Environmen tal Managemen t evaluate providing an overview of the Engineering Design process	<p>OBSERVATION #3 – Environmental Management evaluate providing an overview of the Engineering Design process to Environmental field and permitting personnel to foster a better understanding of what information an Engineer has available to use in determining if an 'E' approval designator is needed.</p> <p>Generally, there was good agreement between Engineering and the reviewer on application of an 'E' approval designator to Engineering Change Notice (ECN) or Modification Traveler (MT). The significant differences for the Double-Shell Tank (DST) and Single-Shell Tank (SST) facilities is due to different factors. For the DST it is due to the large amount of detail contained within the Part B RCRA Permit Application. The increased detail is why the reviewer believes more ECN/MT needed the 'E' approval designator to assure a change did not involve an update to the permit application. As negotiations proceed on the draft Revision 9 of the RCRA permit the U.S. Department of Energy has committed to Ecology to keep the Part B permit application current. The difference for the SST is the result of Engineering using the TOC-ENG-DESIGN-C-52, Attachment D, Risk Screen - Environmental to identify what ECN/MT might have an Environmental risk and consult with Environmental early in the process to identify if an 'E' designator was needed to meet the Table 1 criteria of TOC-ENG-DESIGN-C-52. The reviewer just used the Table 1 criteria.</p>
3/13/2018	WRPS- PER- 2018- 0613	OBSERVATIO N #4 – To assist in applying 'E' approval designation	<p>OBSERVATION #4 – To assist in applying 'E' approval designation, Environmental &amp; Engineering Management evaluate if developing an Environmental Standard document would assist in identify when drawings, Structures/Systems/Components, materials, processes, or TPA primary/secondary documents are discussed in permits or in permit applications so appropriate determination can be made of the need to change permit or update application.</p> <p>Generally, there was good agreement between Engineering and the reviewer on application of an 'E' approval designator to Engineering Change Notice (ECN) or Modification Traveler (MT). The significant differences for the Double-Shell Tank (DST) and Single-Shell Tank (SST) facilities is due to different factors. For the DST it is due to the large amount of detail contained within the Part B RCRA Permit Application. The increased detail is why the reviewer believes more ECN/MT needed the 'E' approval designator to assure a change did not involve an update to the permit application. As negotiations proceed on the draft Revision 9 of the RCRA permit the U.S. Department of Energy has committed to Ecology to keep the Part B permit application current. The difference for the SST is the result of Engineering using the TOC-ENG-DESIGN-C-52, Attachment D, Risk Screen - Environmental to identify what ECN/MT might have an Environmental risk and consult with Environmental early in the process to identify if an 'E' designator was needed to meet the Table 1 criteria of TOC-ENG-DESIGN-C-52. The reviewer just used the Table 1 criteria.</p>

3/13/2018	WRPS-PER-2018-0614	The glossary that maintains a list of definitions that are used in admin procedures, needs updated	The glossary maintains a list of definitions that are used in admin procedures. Many of them are common across multiple procedures so consistent definition is essential. However, the glossary hasn't been updated in a long time. I think it is probably a valuable tool to use, but procedure ownership has probably turned over completely from the last time this was done and people aren't aware of its existence.
3/13/2018	WRPS-PER-2018-0620	ETF-60M-002 EIN does not match	While proceeding through starting LERF Basin 42 to Basin 43, procedure ETF-60M-002 calls for collection of an ammeter reading in the field. The equipment identifier in the field did not match the procedure, nor did the procedure "Data Sheet 7" match the requested information in the body of the procedure.
3/13/2018	WRPS-PER-2018-0623	The AZ-101 flow control valve MK-AZ101K1-2 does not send a signal to MCS	The AZ-101 flow control valve MK-AZ101K1-2 does not send a signal to MCS. The position transmitter (ZT-AZ101K1-2) for this flow control valve may have failed. This PER is initiated to resolve components of Corrective Actions WRPS-PER-2014-0871.1 and WRPS-PER-2014-0871.2. This scope of this corrective action addresses over 70 different issues and will be broken into task specific PERs to make resolution of these issues manageable and more easily tracked to closure.

3/13/2018	WRPS-PER-2018-0630	Missed reading on AY101-WSTA-LDT-152.	Missed reading on AY101-WSTA-LDT-152. ENRAF taken out of service to support AY101 Tank UT inspections. OSD-31 required PER written within 7 days of missed reading.
3/13/2018	WRPS-PER-2018-0629	The ENCL-AZK1-1 "ON" power light is burnt out or not working.	The ENCL-AZK1-1 "ON" power light is burnt out or not working. This issue is also currently monitored on the Rounds Action Tracking List as item AZ-17-012. This PER is initiated to resolve components of Corrective Actions WRPS-PER-2014-0871.1 and WRPS-PER-2014-0871.2. This scope of this corrective action addresses over 70 different issues and will be broken into task specific PERs to make resolution of these issues manageable and more easily tracked to closure.
3/13/2018	WRPS-PER-2018-0631	The AY/AZ primary ventilation B-Train heater (AZ-K1-2-1B) can only be run in the "Local" mode.	The AY/AZ primary ventilation B-Train heater (AZ-K1-2-1B) can only be run in the "Local" mode. This PER is initiated to resolve components of Corrective Actions WRPS-PER-2014-0871.1 and WRPS-PER-2014-0871.2. This scope of this corrective action addresses over 70 different issues and will be broken into task specific PERs to make resolution of these issues manageable and more easily tracked to closure.

3/13/2018	WRPS- PER- 2018- 0632	Unplanned shutdown of exhauster 296-A-42, main stack for AY/AZ tank farms during inspection of stack CAM.	Unplanned shutdown of exhauster 296-A-42, main stack for AY/AZ tank farms during inspection of stack CAM.
3/13/2018	WRPS- PER- 2018- 0624	Production Operations Organization Training Plan Accuracy	<p>This Observation is the result of Quality Assurance Independent Assessment FY2018-WRPS-1-006 – Production Operations.</p> <p>Observation 1: Production Operations Organization Training Plan Accuracy Reference Checklist Item No. 14.2</p> <p>PER Number: Insert PER Number</p> <p>Requirement: Reviewed in accordance with TFC-BSM-TQ_ADD-C-02, Rev A-1, Section 4.4, "Training Plan Review"</p> <p>"Annually perform a Training Plan review with employees.</p> <ul style="list-style-type: none"> <li>• Does the employee's training requirement support assigned duties and R2A2 (roles, responsibilities, authorities and accountability)?</li> <li>• The best time to perform this review with exempt employees, contractors, and managers would be during the performance appraisal process."</li> <li>• "If changes are needed go to 4.1.1"</li> </ul> <p>Deficiency: Contrary to the Requirement, multiple personnel were identified as having training plans that were not accurate. Training Plans were identified as either not completed, not scheduled, or retraining frequency lapsed.</p> <p>Employee training plans should be updated to reflect current courses or remove courses that are no longer required.</p> <p>Recommendation/Actions Taken: • The accuracy of Training Plans was discussed with the Training Manager.</p>
3/13/2018	WRPS- PER- 2018- 0625	Production Operations Records Availability in IDMS	<p>This Observation is the result of Quality Assurance Independent Assessment FY2018-WRPS-1-006 – Production Operations.</p> <p>Observation 2: Production Operations Records Availability in IDMS Reference Checklist Item No. 6.4, 11.7</p> <p>PER Number: Insert PER Number</p> <p>Requirement: Reviewed in accordance with TFC-OPS-OPER-C-41, Revision A-11, Operator Aids, Dated: 11/15/17, Section: 6.0</p> <p>Section 6.0: The following records are generated during the performance of this procedure:</p> <ul style="list-style-type: none"> <li>• Operator Aid Request and Approval Sheet (Site Form A-6007-379)</li> <li>• Operator Aids Index (Site Form A-6007-380)</li> <li>• Operator Aid Audit Checklist (Site Form A-6007-381).</li> </ul> <p>The records custodian identified in the Company Level Records Inventory and Disposition Schedule (RIDS) is responsible for record retention and retirement in accordance with TFC BSM IRM_DC-C-02.</p> <p>Deficiency: Contrary to the requirement(s): the Auditor was unable to request and receive/review the above listed forms from document control, nor with the use of the designated POC requesting the same.</p> <p>Recommendation/Actions Taken: Notification was provided to Management.</p> <p>Personnel Contacted: 1 Central Shift Manager 2 Shift Operations File Custodian</p>

3/13/2018	WRPS- PER- 2018- 0626	SY-AP FARM Equipment ID Numbering and Labeling	<p>This Finding is the result of Quality Assurance Independent Assessment FY2018-WRPS-I-006 – Production Operations.</p> <p>Finding 1: SY-AP FARM Equipment ID Numbering and Labeling Reference Checklist Item No. 16.0</p> <p>PER Number: Insert PER Number</p> <p>Requirement: Reviewed in accordance with TFC-ENG-STD-12, Revision E-0, Tank Farm Equipment Identification Numbering and Labeling Standard, Dated: November 20th, 2017, Section 1.0, 3.1.3, 3.14, and 3.15.</p> <p>Section 1.0 - General Labeling: "The following components shall be labeled: Above ground piping, Valves and dampers, Equipment (e.g., tanks, pumps, motors and compressors), Switches, Circuit breakers (4.16KV, 480V, 120VAC/DC, etc.), Fuse blocks or fuse locations, Instruments and gauges, Busses and motor control centers, Cabinets (including internal components such as relays, terminals, etc.), Room doors, Emergency equipment (such as fire alarm stations, sound powered phone headsets, etc.), Fire protection systems, Any named safety structures, systems, and components (SSC) item or operator control."</p> <p>Section 3.1.3 – Labeling Data: "All labels shall include the first three items below, and then additional information as space permits: The unique assigned EIN, Equipment description, Bar code (if used), Fed From (power supply breaker) information, Old EIN (if used)"</p> <p>Section 3.1.4 – Labeling: "Labels should be permanent, securely attached, and have distinguishable, easy to read information. A description and power supply information should also be provided."</p> <p>Section 3.1.5 Labeling Piping: "Above grade piping shall be labeled to indicate the fluid contained and the normal flow direction. ANSI/OSHA color coding for piping should be used, and pipes containing potentially radioactive, toxic, or explosive chemicals or gases shall be uniquely marked."</p> <p>Deficiency: Contrary to the requirements multiple inconsistencies in labeling were observed in the SY and AP Farms to include piping systems, fire systems, cabinets, valves, pumps, etc.</p> <p>Inconsistencies in labeling were comprised of either degraded, missing, or incomplete labeling to meet the Procedural requirements.</p>
3/13/2018	WRPS- PER- 2018- 0627	Production Operations Operator Aid Audit Performanc e – Use of Outdated Forms	<p>This Finding is the result of Quality Assurance Independent Assessment FY2018-WRPS-I-006 – Production Operations.</p> <p>Finding 2: Production Operations Operator Aid Audit Performance – Use of Outdated Forms Reference Checklist Item No. 11.3, 11.5</p> <p>PER Number: Insert PER Number</p> <p>Requirement: Reviewed in accordance with TFC-OPS-OPER-C-41, Revision A-11, Operator Aids, Dated: 11/15/17, Section 4.6.1: Shift Manager/OE: Direct a competent individual to perform quarterly audit of all active operator aids per the requirements listed in Operator Aid Audit checklist (Site Form A-6007-381).</p> <p>Section 4.6.7 Operator/Operations: Submit completed Operator Aid Audit Checklist(s) (Site Form A-6007-379), Operator Aids Index (Site Form A-6007-380) and Operator Aid Audit Checklist (Site Form A-6007-381) to the File Custodian located at 274-AW for records submission in accordance with TFC-BSM-IRM_DC-C-02.</p> <p>Deficiency: Contrary to the requirement(s): M0577 binder showed use of outdated forms and procedure. Current sheets were unavailable for review. It was noted in the M0577 binder multiple versions/revisions of the same procedure being utilized. (**NOTE: this was NOT the case when looking at the 242 Evaporator binder**)</p> <p>Additionally, the older forms only identified four of the following 5 criteria outlined within Section 4.2.3:</p> <ul style="list-style-type: none"> <li>•Technical accuracy of the operator aid</li> <li>•Appropriate medium and mounting method</li> <li>•Operator aid is not used to bypass normal plant procedure review and approval process</li> <li>•Operator aid is not used instead of approved procedures</li> <li>•Operator aid is not used to provide step-by-step instructions for valve/breaker switching, maintenance activities, or testing activities</li> </ul>
3/13/2018	WRPS- PER- 2018- 0628	Production Operations Pre and Post Job Brief	<p>This Finding is the result of Quality Assurance Independent Assessment FY2018-WRPS-I-006 – Production Operations.</p> <p>Finding 3: Production Operations Pre and Post Job Brief Reference Checklist Item No. 15.1, 15.2</p> <p>PER Number: Insert PER Number</p> <p>Requirement: Reviewed in accordance with TFC-OPS-MAIN-C-02, Revision E-11, Pre-Job Briefings and Post-Job Reviews, Dated: August 2nd, 2017, Section 4.7.</p> <p>Formal Post-Job reviews are required when:</p> <ul style="list-style-type: none"> <li>•A documented ALARA review is required per TFC-ESHQ-RP_RWP-C-03.</li> <li>•Work is stopped due to a reportable event associated with the activity.</li> <li>•Significant number of issues have been observed or identified during the activity.</li> <li>•Stop work was issued due to safety concerns associated with the activity.</li> <li>•Beryllium work activities result in airborne beryllium above the action level.</li> <li>•Directed to be performed by IRG Chairman during high risk review in accordance with TFC-ESHQ-RP_ADM-C-11.</li> <li>•When a formal post-job is required by the above criteria, it should be performed as soon as practical while work group members familiar with the activity are available to provide input.</li> <li>•Formal post-job reviews are documented using the WRPS Post-Job form (A-6005-438).</li> </ul> <p>WD # Level#Pre – Job: A-6002-893BRG A-6006-262ALARA Review (A-6002-919)Post-Job A-6005-438</p>

3/13/2018	WRPS- PER- 2018- 0633	ETF extension cords used improperly	An NCO, while performing surveillances, found two extension cords plugged into a short branch extension cord, which was plugged into an external outlet (located at the South East corner of the 2025E Surge Tank berm). The NCO notified the Shift Manager.
3/13/2018	WRPS- PER- 2018- 0634	222-S No HPT support to survey MT&E prior to calibration	Contrary to the requirements of RWP S-606, calibration activities were performed on beta CAM # 1279 without required HPT support. As a result, a piece of MT&E has been classified as radioactive material for failing to perform required surveys on CAM prior to calibrations.
3/13/2018	WRPS- PER- 2018- 0635	222-S Per should be cancelled	Beta CAM # 1279 calibration reported failed on air flow measurement low greater than 10%.

3/14/2018	WRPS-PER-2018-0589	Evaporator permit only allows brown glass bottles	<p>Boildown samples are currently delivered to the 222-5 Laboratory in brown glass bottles that obscure any solids that may be present in a sample. This is what happened with samples from Evaporator Campaign EC-08. Because the samples came to the laboratory in brown glass bottles, it was not known whether the solids that were present were in the sample when it was taken, or if they precipitated out while in the Hotcells. This caused discussion and delay in order to determine the proper path forward with the samples. According to the responsible manager, this issue may have cost an entire week in the process.</p> <p>A clear glass bottle would solve this issue. Samples used to arrive in clear glass bottles. However, in 2015, samples were discovered broken in the laboratory Hotcells. A causal analysis determined that the bottle type was the problem. At that time, the bottle brand and type were changed and the samplers started using amber bottles.</p> <p>It is recognized that amber bottles are the best choice for taking volatile organic samples. Not all of the samples are analyzed for organics, so there is no necessity for all the bottles to be amber. It is recommended that the evaporator engineers and the cognizant laboratory staff meet to determine a path forward.</p>
3/14/2018	WRPS-PER-2018-0636	AMS-4 CAM inspection and Source Checklist PM for AN, AP and AW farms	<p>AMS-4 CAM inspection and Source Checklist PM for AN, AP and AW farms. Currently AN, AP and AW are not consistent AMS-4 CAM PM's. The current situation is as follows:</p> <p>AN Farm uses PMIDs ET-200065 and ET200066 to perform this inspection. They are the only farm that is currently performing the work and there is no procedure listed.</p> <p>AP Farm has no PMIDs to perform this inspection, but it does have procedure TF-OPS-021 that requires the use of ET-200265, ET-200268, and ET-200070. PMID #'s ET-200265 and ET-200268 have never been used and ET-200070 is no longer active.</p> <p>AW Farm has two PMIDs for this inspection, ET-200067 and ET-200068, both of which are inactive and they were last performed in September of 2016. Procedure TF-OPS-031 was last revised February of 2018 and is an active procedure.</p>
3/14/2018	WRPS-PER-2018-0637	Ladder inspection	<p>While working on an HVAC unit in the marshaling yard employees recognized they needed a ladder to complete their work scope. They searched in the marshaling yard and discovered a stack of ladders and selected one to complete their work activities. The employees did not perform a pre-use inspection of the ladder and put the ladder into use to complete their work. One employee was on the ladder working when the ladder failed at the connection point on top of the ladder causing the ladder to buckle and sending the employee to the ground from the 3rd rung. Upon further review the ladder did not have a current ladder inspection sticker and was staged with other ladders to be excessed.</p>

3/14/2018	WRPS- PER- 2018- 0639	616-008 Heat Reduction Unit (HRU) maintenanc e, and reliability of its operation.	<p>EAPC Safety Book Concern 616-008 entered 3/13/18 regarding Heat Reduction Unit (HRU) maintenance, and reliability of its operation.</p> <p>This unit services the bays at Waste Operations Building 616. Concerns are specifically regarding air quality, temperature control, and constant water leakage from condensate tray into the bays. The unit uses 6 filters (HRU intake on roof), and 5 were missing yesterday when WRPS millwright was on site to perform maintenance.</p> <p>The filters reportedly blow out of place and have been found on the ground. Filter change frequency is believed to actually occur twice a year. Millwright suggests 30 day change out given excess dust found during change out, believed to be due to high winds. Excess dust is found in building and employees complain of temperature extremes that are not well-regulated by the HRU system. Temperature control is inconsistent.</p> <p>Flammable storage bay needs to be maintained below 85 degrees as a best management practice. Heating of the bays during winter months is inadequate and employees have been told to wear cold weather gear for work in bays. For the last two years excessive maintenance has been performed on this unit, and this follows 7 years of the unit not functioning at all. Employees are also questioning HVAC 1 &amp; 2 over admin area due to excess dust and particulate accumulation on registers, false ceiling tiles, and desks.</p>
3/14/2018	WRPS- PER- 2018- 0638	LANCS Polyurethan e Bags expired	<p>During verification of green tag prior to issue to field crew, Quality Assurance Technician noticed the green tag indicated the expiration of LANCS polyurethane bag in bag out.</p>
3/14/2018	WRPS- PER- 2018- 0641	AY/AZ Primary Ventilation System duct joint inspections are not routinely performed.	<p>AY/AZ Primary Ventilation System duct joint inspections are not routinely performed. This is to verify joints are properly sealed to prevent leakages.</p>

3/14/2018	WRPS- PER- 2018- 0642	Costly pallets being destroyed versus returning for use	Shipment of ETF powder drums to ERDF requires the drums to be palletized. Once at ERDF the pallets are not returned as they are disposed along with the drums. These pallets cost 150.00 each recent material request had a price of 15,000.00.
3/14/2018	WRPS- PER- 2018- 0640	General Chemical Awareness Training course	<p>While taking the new General Chemical Awareness Training course, I felt that the training missed the boat. So at the end of the training I commented with the following statement: I thought that the General Chemical Awareness Training was not general, but focused only on vapors. I would think that General would mean discussing the 3 states of matter: solids (dirt), liquids (water), gases (air) (Ok 4 Plasma). Then share that liquids give off vapors... solids when heated may give off fumes or gases. And gases are the air we breathe.</p> <p>I asked for feedback which I received today, 03/13/2018, that indicated that "a committee thought that discussion" of states of matter "was too technical and difficult for the general audience."</p> <p>The American Chemical Society has workshops designed for educators teaching Middle School Students (6 to 8) grade that discuss states of matter. They also have books starting at Pre-K.</p> <p>WRPS is managing a hazardous waste site, containing nuclear materials, and a committee is afraid that the discussion on the states of matter is too technical or difficult for the general audience. Have we lowered our hiring standards</p>
3/14/2018	WRPS- PER- 2018- 0643	Recirculation Module Leak Detectors for AY-101 and AY-102	<p>Recirculation Module Leak Detectors for AY-101 and AY-102 (LDA-AY401-1 and LDA-AY402-1) are locked in a leak condition. However, there have been no reports of liquid on the recirculation module floors. It appears the instruments or their circuitry may have failed.</p> <p>This PER is initiated to resolve components of Corrective Actions WRPS-PER-2014-0871.1 and WRPS-PER-2014-0871.2. This scope of this corrective action addresses over 70 different issues and will be broken into task specific PERs to make resolution of these issues manageable and more easily tracked to closure.</p>

3/15/2018	WRPS-PER-2018-0644	Project L-853 ETF was not included in the excavation permit DAN17-0140 or the Site Evaluation Form 200E-2017-0007	MSA has initiated project L-853 to install a sewer line from 200 East Area to 200 West Area. This line runs parallel to the Effluent Treatment Facility State Approved Land Disposal Site line which causes the contractor to traverse the SALDS line with heavy equipment. ETF was not included in the excavation permit DAN17-0140 or the Site Evaluation Form 200E-2017-0007 therefore heavy equipment traversing the SALDS line was not evaluated.
3/15/2018	WRPS-PER-2018-0645	Condensing unit # 5 ( EVU # 5 ) cooling for E.T.F.	Condensing unit # 5 ( EVU # 5 ) cooling for E.T.F. control room & upstairs offices and computer room. we had a high temperature in control room of 78.97 DEG f at 0634 on July 20 2017 . the problem persisted on Aug 23 2017 with control room temp reaching mid 80 DEG f & C.R.O. operators needing to plug in portable room exhauster's to deal with the heat they had to suffer with. R.E.S. found Condenser #5 to be low on refrigerant . So yes it has a leak . we will need refills of refrigerant until we get a new Condenser for control room like we got last year for downstairs condenser # 3 (E.V.U. #3 ) Note: R.E.S. Does not like to keep adding refrigerant to known leaking( into environment ) condenser's. a permanent fix will & should be a priority now & not at the end of this coming summer
3/15/2018	WRPS-PER-2018-0646	Radiological Routine Surveys WTP-W-001/WRPS-RMA-079 it was observed that there are several items with fixed contamination on th	During performance of Radiological Routine Surveys WTP-W-001/WRPS-RMA-079 it was observed that there are several items with fixed contamination that are not identified as Fixed Contaminated. Also there are items that have degraded tape over what were unidentified removable or fixed contaminated areas due to loss or missing tags. Another cask stand has fixed contamination that was painted over but not according to the fixed contamination painting protocol. A waste box is still in the RMA with the lid sealing area taped over due to removable contamination.

3/15/2018	WRPS-PER-2018-0648	Newly installed electrical equipment is not being turned over to WRPS in a timely manner.	During the course of the assessment it was identified that newly installed electrical equipment is not being turned over to WRPS in a timely manner. During this delay neither the sub-contractor nor WRPS is following the manufactures instructions that require GFCI's to be inspected on a monthly basis. There seems to be an excessive delay in the time the subcontractor informs WRPS that the equipment is ready to be turned over and the time that WRPS conducts acceptance tests on the equipment and then places it into the maintenance program. During this gap no monthly GFCI testing is conducted. In some cases this gap has been in excess of one year.
3/15/2018	WRPS-PER-2018-0649	DOE-0359 training class has not fixed all gaps in (b)(6) understanding of the requirements.	DOE-0359 training class has not fixed all gaps in (b)(6) understanding of the requirements outlined in DOE-0359. (b)(6) still follow tribal knowledge and their past understanding that does not follow the requirements outlined in DOE-0359. One example is that (b)(6) continue to tell (b)(6) that only (b)(6) can perform escorting duties within a Limited Approach Boundary. This is not correct and continually needs to be corrected.
3/15/2018	WRPS-PER-2018-0647	English customary units	Then TFC-ENG-DESIGN-C-25, Rev G-1 States: "English customary units are used for measurements contained in engineering documents, unless otherwise approved by the Chief Engineer and approval is documented on the release form." I have a few concerns with this sentence: +The term "English customary units" is not an actual technical term. It is impossible to comply with this requirement as there is no widely accepted set of "English customary units". It probably intends to reference "US customary units". It is an error to refer to U.S. customary units as either "British" or "Imperial" despite the similarity the unit systems have with each other. Furthermore, any reference to Imperial or English units should be avoided because of the volume difference between the US gallon and the UK gallon. + At the Hanford site mixed units are typical. Documents and procedures use whatever unit set is familiar, prudent, or expected. For instance chemical concentration are typically report in microgram per milliliter, while waste volumes are reported in kilo-gallons. +There is no defined process or procedure step to seek the Chief Engineer's approval. There is no way to document the approval in the document release process or document release form. Unit system requirements are not captured in TFC-PLN-03. It doesn't make sense to me to require the Chief Engineer approve the units used in a document.

3/15/2018	WRPS-PER-2018-0650	Emergency preparedness drill	<p>On 2/14/2018, WRPS Security and Emergency Services (SES) conducted an emergency preparedness drill to evaluate emergency response actions involving an crane accident in AX farm that impacted the Tank Farms. During the course of the drill, the evaluation team identified the following "Suggestion" which pertains to EP-Program Element 6 "Emergency Response Organization".</p> <p>Utilization of the appropriate communication pathways throughout the drill could have used improvement. Resources were requested and safe routing was communicated without the approval of the IC. (P/E 6.23)</p>
3/15/2018	WRPS-PER-2018-0651	SOEN indicating an Alert and then upgrade to Site Area Emergency Never sent	<p>On 2/14/2018, WRPS Security and Emergency Services (SES) conducted an emergency preparedness drill to evaluate emergency response actions involving an crane accident in AX farm that impacted the Tank Farms. During the course of the drill, the evaluation team identified the following "Suggestion" which pertains to EP-Program Element 10 "Notification and Communications".</p> <p>A SOEN indicating that an Alert and then when upgraded to a Site Area Emergency were never sent to update site personnel on the status of the event. (P/E 10.15)</p>
3/15/2018	WRPS-PER-2018-0257	ETF facility is using CHPRC-01294	<p>The ETF facility is using CHPRC-01294 "LWFS Guidance for Modification and Repair of ASME Code Piping Systems," superseding ASME B31.3 and WRPS procedure TFC-ENG-STD-19 "Alteration and Repair of ASME-Coded Pressure Systems." This document is no-longer controlled by CHPRC and was last revised in 2011. It was confirmed with WRPS procedures group that they are unaware of any CHPRC document or procedure that is being used at the ETF facility.</p> <p>It is not identified as a governing document on the WRPS website. From discussion with Personnel involved with turn over of the ETF facility in 2015, the only CHPRC document identified as being turned over was "CHPRC-00189 Environmental Quality Assurance Program Plan." Any other document was not discussed or reviewed for use at ETF since facility turn over. The document can be found in Smartplant, which is a records repository.</p> <p>This issue was discovered during a QA review of work packages.</p>

3/16/2018	WRPS- PER- 2018- 0658	ETF P060C-- P-2A bearing out of spec	On MTT Rounds Sheet ETF-30-001 Sheet 2 of 5, 60C--P-2A Pump A Bearing indicator. RATL 17-MT-005 was written to "Track" Bearing being "RED CIRCLED" and out of Spec. for over 5 years. Engineering is tracking it, but no action is being taken and NCO's have been writing this down for years. Do we change how the Round is written, correct the issue or "other" option.
3/16/2018	WRPS- PER- 2018- 0659	ETF pump re- occurring "high current alarm"	TDF Pump station #1 side B Pump 68A-P-82 pump has re-occurring "Pump High Current alarm" (68x-P-xx Overcurrent Alarm ETF-ARP-68-001) at start up. This is happening up to approximately every 8 hrs. ETF ARP-68-001 cannot be completed as written.
3/16/2018	WRPS- PER- 2018- 0660	step over an electrical conduit line at ETF	doing ETF-30-001 STT operator rounds I have to step over an electrical conduit line (not on the ground) to read Pi-95D-003. I believe this to be a fall hazard and a electrical hazard.

3/19/2018	WRPS- PER- 2018- 0661	Other Hanford Prime Contractor Document Website Needs to be evaluated for correctness	This MOP performed a high-level integrity check of the OHPCD website by analyzing a random sample (subset) of website listings for proper functionality and consistent presentation of select data points. The file attachment to this MOP illustrates both the MOP's sampling methodology and results. Of the 165 document listings on the OHPCD website, 73 (44%) were examined to obtain an indication of the website's accuracy. This MOP's file attachment also identifies 6 listings (3.6%) that would benefit from inserting missing words (or removing erroneous ones); in one case, two different USQ numbers appear on an OHPC document, which should be reviewed for correction.
3/19/2018	WRPS- PER- 2018- 0662	Unlock space below the check boxes on form A-6006- 215.	WRPS Calculation Checklist form A-6006-215 is locked below the check boxes. The checker cannot type their name on the identifier line, nor is there any space to type in explanations to "No" or "NA" boxes. This makes it difficult to comply with the instruction to discuss the scope of the check (footnote 1) or justify any "No" box (footnote 2).
3/19/2018	WRPS- PER- 2018- 0663	T-Farm Tumbleweed Build Up	I performed a MOP on T Farm on 03/19/18. No visible new vegetation growth was present. There is a large quantity of tumbleweeds located at the change trailer preventing access to one of the storage trailers and quite a few tumbleweeds built up on the inner fence line of the farm.

3/19/2018	WRPS- PER- 2018- 0665	APO2A Waste Transfer Leak	While performing the AP103 to AN101 waste transfer a leak detector alarm and increased dose rate were observed at APO2A.
3/19/2018	WRPS- PER- 2018- 0664	Sampling Hooks Failed PMI Inspection	While performing a Positive Material Identification (PMI) test of Purex hooks from spares, so as to support CGD-50227, it was determined that the sampled hooks failed the material requirements. Material was to be ASTM A747, Grade CB7Cu-1 or CB7Cu-2. Based on the PMI test, the chemical composition of the materials was determined to be stainless steel (Type 301). Two separate sampling of hooks were evaluated. See NCR for sample size. Results are documented on NCR# TF-17-NCR-030.
3/19/2018	WRPS- PER- 2018- 0666	AW105-WST LIT-106 Card Failure	During routine maintenance for calibration and functional testing of AW105-WST-LIT-106 a card failure occurred. The plummet would rise, but would not go back down. Maintenance left the ENRAF in a safe configuration and reported the condition to the Shift Manger.

3/19/2018	WRPS- PER- 2018- 0668	ECN released without signature	It was discovered that ECN-711940 A-103 Instrument House and Air Circulator Building Demo was incorrectly given a work complete date in Smartplant of 12/21/2017 which is actually the date the ECN was released. The ECN then appeared on our report of work completed ECN's on Support drawings and was incorporated by mistake. A check with the design authority confirmed the ECN was not work complete.
3/19/2018	WRPS- PER- 2018- 0667	annual ladder inspections lack rigor	I do not believe annual ladder inspections are adequate enough to ensure safe working conditions of ladders.
3/19/2018	WRPS- PER- 2018- 0669	Redline Engineering Change Control workflow took too long	Following a review of the procedure change process from Revision 3 to Revision 4 against procedure TFC-ENG-DESIGN-C-31, Redline Engineering Change Control, it was observed the workflow duration extended over many months. Based on the relative minor change type, this duration does not appear to be commensurate.

3/19/2018	WRPS- PER- 2018- 0670	242-A Diesel Storage Tank leak detector ULD-1 not in service and requires troubleshoo ting and repair.	242-A Diesel Storage Tank leak detector ULD-1 not in service and requires troubleshooting and repair.
3/20/2018	WRPS- PER- 2018- 0672	Animal Burrow Found in BY- Farm	Suspected abandoned animal burrow found in BY-Farm.
3/20/2018	WRPS- PER- 2018- 0673	RCRA Surveillance Missed	On 3/20/2018 during the performance of Rounds ETF-30-52748 "ETF-Safety/RCRA Surveillance" the assigned NCO was reviewing the previous days entries prior to going to the field. The NCO noticed that on Sheet 12 of 14, the required surveillance was not performed/documented for the Waste Accumulation Areas as required on 3/19/2018. The Round Sheet was signed by the NCO and reviewed/signed by the on duty SOM.

3/20/2018	WRPS- PER- 2018- 0674	Druck Contaminat ed at 2225 Removed From Service	Druck, 30 PSIG, Serial # 3304216, Model #DPI610 (M&TE # 702-35-40-020) was notified from 2225 Labs that this item was declared radioactive material and not coming back to the 272WA Tool crib.
3/20/2018	WRPS- PER- 2018- 0676	Sierra Mass Flowmeter Contaminat ed at 2225 and Removed From Service	Sierra Mass Flowmeter, Serial # 175548, Model # M100H-DD-15-OV1 (M&TE # 702-28-03-029) was notified from 2225 Labs that this item was declared radioactive material and not coming back to the 272WA Tool crib.
3/20/2018	WRPS- PER- 2018- 0677	TFC-ENG- FACSUP-C- 04 MOP	<p>For this MOP I chose to concentrate on reviewing procedure TFC-ENG-FACSUP-C-04, Tank Farms Process Memos. I chose this procedure as my group is in the midst of generating a Process Memo (PM) to support the 242-A evaporation campaign EC08 in mid-April. As part of this procedure review I chose to interview engineers Ken Bentley and Zabrina Smith from my group who have both been responsible for generating this document in the past to support campaigns. I also reviewed PM-17-09, 242-A EC07 Process Memo and the draft copy of PM-18-01, 242-A EC08 Process Memo as well as the Process Control Plans (PCP) for both campaign runs (RPP-PLAN-61490 &amp; RPP-PLAN-61925 respectively).</p> <p>Staff interviewed indicated that the PCP is the vital document that they base much of the content of the PM on as well as working with the Operations Manager and Operations staff to layout the details and requirements of the PM. Both PMs that I reviewed did an excellent job referencing Operations procedures that govern the actual work that goes into operating to the PM.</p> <p>Some specific questions I asked included the following with a summary of the responses I received:</p> <ol style="list-style-type: none"> <li>1. Who is responsible for generating a PM? Answer was that engineering is and in our case for 242-A evaporation campaigns, the Evaporator support engineers are responsible and assigned by the Evaporator Engineering Manager or delegate.</li> <li>2. Who approves the PM for the Evaporator? Engineering and Operations Manager. The Processing Engineering Group Manager can be added.</li> <li>3. How long is a PM good for? For 6 months or until canceled or finished and closed out.</li> <li>4. Does a PM need a USQ? Yes.</li> <li>5. Where does the hard copy of the PM go while performing operations to the PM? To the Central Shift Manager in the Central Shift Office and into the Process Memo Log.</li> <li>6. How are changes to the PM made? Must close out the PM and generate a new revision of the PM.</li> <li>7. Do you have any issues following the procedure? The distribution list should be clarified. Currently it is required to include distribution to Work Planning Mgr. (if appropriate), Sample Coordinator (if appropriate), and Software engineering manager. For the campaign PM's this distribution is not appropriate (who makes this call?).</li> </ol> <p>The procedure states that you call the Central Shift Office to acquire a PM # and indicates that the # will be in the following format: PM-YY-NNN, YY being the 2 digit year, and NNN is a sequential number, when you call the central shift they just give it to you YY-NN. We typically add a 0 in front to make it a 3 digit NNN #.</p> <p>A question was asked as to why the PM is not found in SmartPlant Foundation? I did not know how to answer this, but they all seem to be located in IDMS (though difficult for me to navigate and find).</p>

3/20/2018	WRPS- PER- 2018- 0528	Improvements to ATS-310 Section 4.10 needs updates	<p>While reviewing ATS-310 Section 4.10, Management of Lead, I found that:</p> <ol style="list-style-type: none"> <li>1) The Procedure section (section 4.0) lacks the procedural detail. The existing procedure steps are requirements, not direction for performing the task.</li> <li>2) The Lead Accountability Form is identified as a Record document, but the procedure does not describe the steps to ensure that the form is filed as a Record.</li> </ol>
3/20/2018	WRPS- PER- 2018- 0678	616 Septic Tank Pumping Schedule	<p>Regarding 616 Building: The 616 building has the septic system pumped on 3-19-18 this was done due to concerns from the building occupants. Need to ensure this septic tank is placed on a periodic/pumping inspection with MSA.</p>
3/20/2018	WRPS- PER- 2018- 0681	RSR Discrepancies	<ol style="list-style-type: none"> <li>1. During the performance of the February Production Operations Radiological Control Radiological Survey Report (RSR) Review, discrepancies were identified with 9 Radiological Survey Reports.</li> <li>2. Discrepancies were communicated to respective RCFLMs for correction.</li> </ol>

3/20/2018	WRPS- PER- 2018- 0682	DRUCK M&TE# 820- 35-40-012 "As Found " reading during calibration was Out-Of- Tolerance	Druck, Serial# 6102109010, Model# DP1610 (M&TE# 820-35-40-012) "As Found " reading during calibration was Out-Of-Tolerance. It was adjusted to manufacturer spec.
3/20/2018	WRPS- PER- 2018- 0683	Outdoor HEPA Vacuum Operations ETF-40-001, Does Not Address Indoor Vacuum Usage.	Outdoor HEPA Vacuum Operations ETF-40-001, does not address indoor vacuum usage. The use of vacuums at 2025E (ETF) Should be performed under a procedure to ensure the proper pre checks, usage, and post checks are done. other issues that need addressed are: mixed waste, Low level rad waste, F-listed codes, and securing with locking devices. Currently there is no instructions or procedures that cover these topics.
3/20/2018	WRPS- PER- 2018- 0679	HASQARD Assessment	<p>During the preparation of the FY 2018 input for the WRPS technical basis for assessment activities, ESHQ staff members noted a lack of processes in place to implement the HASQARD-driven assessments required of each independent QA project/program plan being implemented at Tank Farms.</p> <p>This effort should include evaluation of the multiple separate assessment obligations owned by Tank Waste Inventory and Characterization, Industrial Hygiene, and Environmental Protection, among others.</p> <p>Processes to address these assessments could be effectively addressed with a streamlined strategy that has yet to be developed and institutionalized. While the contract commitments and requirements are clear, these assessments have not been historically performed and are not scheduled for 2018.the Assessment Technical Basis nor the integrated assessment schedule.</p> <p>The complexity of the required assessment elements is such that a scoping exercise, such as an assessment of the implementation of HASQARD, would likely provide a meaningful roadmap to demonstrating compliance that would be preferable to simply scheduling several dozen heretofore .unscheduled assessments without clear understanding of process.</p> <p>The recommended actions below address these recommendations.</p>

3/20/2018	WRPS- PER- 2018- 0685	Work Package Changes Need For AX- 04B Work	<p>In section 3.0 DESIGN REQUIREMENTS, of RPP-CALC-61792, RO Lifting Analysis of the Vertical Turbine Pump Located in Pump Pit AX-04B, it states:</p> <p>3.0 DESIGN INPUTS Inputs Requiring Field Verification</p> <ol style="list-style-type: none"> <li>1. There is an all-around fillet weld attaching the lifting bail W-section member to the pump adapter flange (see Section 8.3.5). The minimum weld required per AISC 6th Edition is 5/16" fillet. Using 3/16" fillet would return conservative results. Existence of 3/16-inch weld at this specified location to be field verified before rotating pump to horizontal orientation.</li> <li>2. Based on the motor mounting flange bolt hole diameter (0.69 in = 11/16 in) from the 75 hp Baldor motor drawing (see Attachment 3), the bolts attaching the motor to the adapter flange are expected to be 5/8" in diameter based on standard bolt hole sizes from Table J3.3 of AISC 14th Ed. They are also expected to be stainless steel material. Stainless steel material and minimum bolt size of 5/8" (diameter) to be field verified before rotating pump to horizontal orientation.</li> </ol> <p>These actions do NOT need to be completed prior to lifting the subject pump vertical, but prior to conducting the operation for transitioning the pump from vertical to horizontal, the actions MUST be completed.</p> <p>This PER should track these actions.</p>
3/20/2018	WRPS- PER- 2018- 0684	UX302A Liquid Pumping System	<p>The UX302A Liquid Pumping System is undergoing a design update due to lack of design rigor as documented on existing PER-2017-2686. Prior to initiating the new design, the drawing package (as identified on H-14-107645, "Drawing Tree 241-UX-302A Pumping System") was revised to incorporate all outstanding work-complete ECNs. The updated drawing package will be released via EDT-851503. During a walkdown to verify designs depicted on the revised drawings it was noted that the Pressure Relief Valve PORS3-SA-PRV-133B did NOT agree with the work-complete condition described on ECN-12-001312: the PRV SHOULD HAVE been a 1-1/2" / 20 psig / 330 SCFM / Bronze pressure relief valve, while the AS-FOUND condition was the original 3/4" / 20 psig / 131 SCFM / Bronze pressure relief valve described on ECN-12-001312. The ST Team requires the expeditious release of the EDT to proceed with preparations to pump down the UX-302A tank due to rising tank levels from rain water infiltration. The PRV will be replaced as part of work package "382188 - Assemble and pressure test UX302A Assemblies." This PER is generated to track the configuration of PORS3 until it is made to agree with the engineering drawings and the hydrostatic test is completed and documented, prior to commencing 241-UX-302A pumping operations.</p>
3/21/2018	WRPS- PER- 2018- 0688	Safety Basis Implementa- tion Webpage MOP	<p>The Safety Basis Implementation Webpage was reviewed based upon potential confusion about a link provided to "Approved Safety Basis Implementation Letters" which is located on the page listed as: <a href="http://toc.wrps.nrc.gov/rapidweb/OPS/index.cfm?pagenum=5">http://toc.wrps.nrc.gov/rapidweb/OPS/index.cfm?pagenum=5</a></p> <p>On the left side of the webpage under the Header of Performance Assurance; Safety Basis Implementation, as well as on the right side of the page under the header of "Helpful Resources". The link takes the user to an IDMS folder where the issued interoffice memos for each SB Implementation Interoffice Memo with attached checklist are located. The title of the link is potentially misleading to the user unfamiliar with the process.</p> <p>The webpage/process owner should consider potentially changing the "title" of the link or provide further description of the process to include how WRPS/ORP "officially correspond" relative to Safety Basis Changes. The link to the Nuclear Safety page contains the official correspondence between the TOC Contractor and ORP.</p> <p>The second issue identified during the review of this page was a potentially outdated reference to the Requirement Implementation Matrix (RIM) and seems to lack a reference, or link to the Requirements Matrix Database (RMD).</p> <p>Operations/Safety Basis Compliance Office has been transitioning from the RIM to RMD. While reviewing the Environmental Department webpage under the following header: Environmental Regulations: Requirements Mapping Database (RMD) link <a href="http://toc.wrps.nrc.gov/rapidweb/ENV/index.cfm?pagenum=40">http://toc.wrps.nrc.gov/rapidweb/ENV/index.cfm?pagenum=40</a> it was discovered they provide a link to their section of the RMD. SB/CO may want to consider adding a similar link to their page to the Operations section of RMD.</p> <p>Recommend a PIE/CIM to the Safety Basis Compliance Officer.</p>

3/21/2018	WRPS-PER-2018-0689	Grove 150-ton Crane Movement	<p>After a WRPS Hoisting &amp; Rigging meeting, it was brought to the attention of Engineering that the Grove RT9150E 150-ton capacity crane was being moved within the A Tank Farm complex with its counterweights on. Parts of the route included on the route maps used in this movement, include underground components that are protected by encasements and/or bridge plates for allowing crane access. The route maps that authorize movement within those areas have been evaluated for crane movement, but some of the components analysis did NOT include the weight of the 150-ton crane WITH the counterweights on.</p> <p>In RPP-CALC-41527, R1 Bridge Plate Design for Tank Farms, page 15/23 it identified in a note the following: As of 2015, the governing vehicle axle load is based on the Grove RT9150 150 ton capacity crane with the counterweight and manual extension (jib) not installed.</p>
3/21/2018	WRPS-PER-2018-0690	Contamination Discovered in RMA	<p>HPT's were requested to survey equipment in preparation for shipment from WRPS-RMA-038 at 2713 WB "Green Hut" to AZ farm. The items consisted of a sleeving tensioner, 2 piece top hat in preparation for AZ02A pump removal. The equipment is used to retrieve long length items out of pits and was last used, surveyed, and shipped from AP Farm to the Green Hut around Oct. 2017. The sleeving tensioner had contamination levels of 85,940 dpm and 10,270 dpm smearable beta /gamma direct, and 28 dpm direct and no smearable alpha. The top hat lid had 56,000 dpm direct and 450 dpm smearable beta/ gamma, and 371 dpm direct and no smearable alpha. Once the contamination was found the items were bagged and tagged, as well as surveys of the surrounding areas. No other contamination was identified.</p>
3/21/2018	WRPS-PER-2018-0680	Cathodic Protection Cable Discovered When Excavating	<p>Wire exposed/severed at 5X farm when a mini-excavator bucket was lowered into the previously excavation trench for personnel to hand shovel blow sand from floor of trench. Once the bucket was full of blow sand, (b)(6) lifted the bucket from the floor of the trench and (b)(6) noticed the edge of the bucket (without teeth) had snagged a wire (approximately 1/2" in diameter) and severed it before (b)(6) was able to alert (b)(6).</p>

3/21/2018	WRPS- PER- 2018- 0691	TOC Confined Space Website Updating	Safety and Health Professionals in the field at the project level are currently submitting required records via an email process to the program SME to upload to the TOC Confined Space website. Individual employee's emails are probably not the best way to process such valuable records. For instance, if the SME gets flooded with emails or is no available to process the records, completed forms may not be timely disseminated for field use and critical confined space record retrieval (A-6005-717, A-6005-724). Any amount of turnover in confined space SME (e.g., alternate SME taking the place of the primary on PTB), and emails can easily get lost. Thus creating a series of error prone conditions leading to important records potentially not get accurately uploaded into a complex IDMS record and Share-Point data application process.
3/21/2018	WRPS- PER- 2018- 0692	ACES Entry Requirements for Escorted Workers	I was able to successfully ACE into Tank Farms under EEA and RWP-TF-101 (and issued an Electronic Dosimeter) on 3/21/18. However, confusion existed with multiple organizations that this should not have been allowed and Tank Farm access will not be granted going forward for this role. However, after reviewing procedure TFC-ESHQ-RP_ADM-C-15, Rev. E-11 (latest revision), Entry and Exit Controls, this is allowed as long as the escorted employees are not entering areas with potential exposures (i.e., posted as Vapor Control Zones (VCZ)).
3/21/2018	WRPS- PER- 2018- 0694	ETF-AOP- 858-011 due to unreliable response of ETF MCS	Entry into ETF-AOP-858-011 due to unreliable response of ETF MCS. At approximately 1400 hrs. ETF Control Room Operator reported the MCS interface for LERF was non responsive when attempts were made to start the Basin 44 pump and/or shutdown the basin 42 pump transferring basin contents to Basin 43.

3/21/2018	WRPS-PER-2018-0695	222-S Data Summary Reports missing Analyte	<p>Data Summary Reports (DSRs) generated from OmniLIMS for AW-104 and AP-107 DFLAW grab samples had a missing analyte. Re-working the reports to get the analytes to appear on the DSR causes delays in getting the results reported to the TOC.</p> <p>The DSR in RPP-RPT-60261 (AW-104) issued in August 2017 had a result for Cesium-137 but the DSR in a revision of the same report generated in January 2018 was missing the Cesium-137 result. The WHL Project Coordinator indicated that nothing had been changed in OmniLIMS that would have caused the change. Pages from both DSRs are attached.</p> <p>The DSR for RPP-RPT-60171 (AP-107) issued on 3/19/18 had a missing Ruthenium/Rhodium-106. The PC indicated that in order to get the result to appear on the DSR, the batch had to be pushed back to the chemist level and the approval process had to be repeated. The DSR pages are attached. The PC also reported that this issue has occurred before and the DSRs have to be re-generated over and over again in order to get all the analytes that have been selected to reported to appear on the DSR.</p>
3/21/2018	WRPS-PER-2018-0696	ETF lights burnt out.	<p>Multiple lights burnt out inside the Verification Berm at ETF.</p>
3/22/2018	WRPS-PER-2018-0698	Oil Was Spilling from a Drain Pan Beneath a Portable Power Generator.	<p>Title: Performed a Pre-Transfer Tour of Tank Farms</p> <p>Summary: The FR toured tank farms as part of the pre-start walk downs for the upcoming DST to DST transfer activity scheduled for tomorrow afternoon. I was accompanied by one of the more recently qualified FRs. We met with the CSM, OE and STE prior to the tour.</p> <p>The following issues were noted: 1. Oil spilling from beneath a portable power generator. Immediately reported this to the CSM, who responded by sending a crew to the field. Environmental was notified. See Finding. 2. Unsecure security fence at the A farm Southwest vehicle gate. Immediately notified the CSM. This issue is being documented by the other FR that accompanied me.</p> <p>-----</p> <p>Issue Type: Finding (Level 3) Significance Level: 1 Statement: Oil Was Spilling from a Drain Pan Beneath a Portable Power Generator. (Priority Level 3, Ciola, 3-16-18).</p> <p>Discussion: During a tour of the Eastern perimeter of AP farm, oil was found spilling from a drain pan beneath a portable power generator. Immediate notification was made to the Central Shift Manager, who sent a crew out to respond. Environmental on-call was notified. The Facility Representative performed an immediate extent-of-condition in the area. There were no other concerns noted. The same issue had been identified on February 21, 2018 and a PER was issued to stop the spill and clean-up the oil. See WRPS-PER-2018-04442.</p> <p>Requirements: TFC-OPS-OPER-C-55, Rev A-6; Portable Powered Equipment Management</p> <p>4.12 Ensure Set-up of Equipment:</p> <p>Note: Catch pans or other containment devices must be installed under the equipment and associated supply tanks</p>

3/22/2018	WRPS- PER- 2018- 0699	222-S 4N Demolition Pre-Job with no EHE discussion	<p>Title: Attended Pre-job for WO #169916, 222-S Perform Room 4N Demolition</p> <p>Summary: This meeting was the initial pre-job briefing for the Room 4N room demolition at 222-S, a Level 1 work package. The work scope is being performed by several different subcontractors. During the meeting the FWS stepped through the pre-job checklist.</p> <p>Safety topics included Daylight savings time as a day when particular attention to safety is warranted as folks are often tired while trying to adjust to the time change. The Con Ops coach brought up the importance of peer checking to help mitigate the potential for safety concerns and as a best practice.</p> <p>Radios will be used when performing work on both the 1st and 2nd floor simultaneously and three way communication will be required and was discussed.</p> <p>The FWS stated an Electrical Hazards Evaluation was included in the work package but did not review it with the group as he stated it only applied to the electrical subcontractor's scope of work. (Ebert, F01)</p> <p>The JHA was discussed by the Safety Representative. When discussing Industrial Hygiene the FWS stated there are no beryllium hazards. He also stated air monitoring for clearance after asbestos abatement will be required. He was unsure if there were other industrial hygiene hazards identified. Later in the meeting an HPT pointed out that IH was not represented at the meeting. After the meeting the FR discussed IH representation with the Deputy Lab Manager. He stated that the safety rep was present but did not speak up. He also stated that projects generally sends a representative from IH to support pre-jobs. This was also discussed with the Con Ops coach who was present.</p> <p>Also discussed was a scissor lift that was used during a previous demolition in 2015 that currently resides in the CA that will be used for this room demolition. It was stated that the tires on the scissor lift are covered in areas with tape to contain low levels of alpha contamination that resulted from the last room demolition. The FR will follow up with ORP RadCon to discuss the adequacy of using tape to prevent contamination spread.</p> <p>It was stated that LO/TO applied only to the electrical hazards identified and the only persons inside the room during this work will be the electrical subcontractor who will be required to apply their AW locks.</p>
3/22/2018	WRPS- PER- 2018- 0700	Excavation identified on the General Hazard Analysis (GHA) as "Not Skill Based - JHA required."	<p>Excavation identified on the General Hazard Analysis (GHA) as "Not Skill Based - JHA required."</p> <ol style="list-style-type: none"> <li>1. Operate hand excavation tools listed as skill based activity on Teamster SOC listing</li> <li>2. Leads to performance of JHA even if no hazards are identified through prerequisite means, e.g., ground scan.</li> <li>3. JHA signatories are signing in acknowledgment to a non-existent hazard with no controls.</li> </ol>
3/22/2018	WRPS- PER- 2018- 0701	Acceptable Use Range Listed On Instrument Form Incorrect	<p>During a procedure/process review at the Effluent Treatment Facility, it was identified that the Acceptable Use Range generated for portable radiological control instruments had an error documented on the form used for receipt of new instruments.</p> <p>The Facility Point of Contact (FFOC) was notified by (b)(6) and an investigation was performed to identify if a non-compliance had occurred and the potential extent of condition due to the error.</p> <p>Upon review, it was identified that the mathematical error had been documented on the Acceptable Use Range for a spare/back-up source, which had not been used since the form had been completed. The mathematical error was corrected and all other Acceptable Use Ranges were reviewed with no other issues noted.</p>

3/22/2018	WRPS-PER-2018-0652	222-5 QA Surveillance issues with 207-SL Retention Basin	<p>During a QA surveillance of the annual multi-media sampling of the wastewater in the 222-5 Laboratory 207-SL retention basin it was discovered that annual management assessments have not been conducted on the multi-media sampling program. The owners of RPP-PLAN-54895 have not conducted annual management assessments of the multi-media sampling program. A management assessment is not meant to be a compliance assessment against HASQARD, such as is conducted for independent assessments and QA surveillances, but rather it's an evaluation of the following elements:</p> <ul style="list-style-type: none"> <li>• Effectiveness of the management control systems that are established to achieve and assure quality</li> <li>• Adequacy of resources and personnel available to achieve quality objectives to which the quality systems apply</li> <li>• Effectiveness of training and assessments</li> <li>• Applicability of data quality requirements</li> <li>• Client complaints</li> </ul> <p>Management assessments should also identify noteworthy accomplishments, significant QA problems, and opportunities for improvement.</p>
3/22/2018	WRPS-PER-2018-0653	222-5 QA Surveillance issues with 207-SL	<p>During a QA surveillance of the annual multi-media sampling of the wastewater in the 222-5 Laboratory 207-SL retention basin it was discovered that Quality Assurance reports to management have not been issued for reporting the status of the multi-media sampling program. These reports to management should include a summary of the results on such topics as: technical assessments, management assessments, QA surveillances, data quality and validation assessments, regulatory compliance issues, quality improvement processes, and significant QA problems and recommended solutions. The QAPJP for multi-media sampling (RPP-PLAN-54895, Rev. 2) should identify the frequency of the QA reports, the report recipient, the report preparer, and the topics to be discussed. Normally, this report will be prepared by the person responsible for maintaining the QAPJP and its purpose is to provide management a status on the state of the QA program. In addition to the reporting on the results of management assessments, technical assessments, and QA surveillances, this report provides an opportunity of reporting corrective action status, the results of any blind sampling, and other QA/QC issues that arise.</p>
3/22/2018	WRPS-PER-2018-0693	Expectations For Columbia Basin Analytical Laboratory	<p>Two questionable decisions were made by subcontractors operating the Columbia Basin Analytical Laboratory (CBAL) mobile laboratory (ML). Both had the potential to compromise background air sampling results during the first day of a 24 day 2018 background air sampling campaign.</p> <ol style="list-style-type: none"> <li>1) an exhaust hose from the Labs diesel generator was not positioned at the maximum downwind distance (~40 ft.) from the ML air sampling intake port, and</li> <li>2) desorption tubes being used in a timed sample collection were suspended by local vegetation, a possible source of biogenic Volatile Organic Compounds (VOCs). Since the desorption tubes were to be used as a confirmatory check on detections by the ML it was desirable that they would experience the same sampling conditions.</li> </ol> <p>Both situations have been discussed between the WRPS Project Engineer and the CBAL Chief Scientist and it is believed expectations are now in alignment. Continued ML operations will be further monitored by WRPS QA and the Project staff.</p> <p>This has situation been documented in Quality Assurance Surveillance Report, TF-18-QSR-080, Vapors – 2018 CBAL Mobile Laboratory Initial Operation.</p> <p>This PER is being submitted for trend only purposes. No further action is recommended.</p>

3/22/2018	WRPS-PER-2018-0704	Degraded Radiological Postings at TX/TY Farm	While performing a "Walk Your Space Down" MOP. It was discovered that there are some radiological signs that are degrading to point of recognition at TX/TY farm.
3/22/2018	WRPS-PER-2018-0705	Tumbleweed Issue at TX/TY farm	While performing a "Walk Your Space MOP Down", it was noticed that the Tumbleweed issue at TX/TY farm is becoming emergent. To the point where they are blocking view of radiological and operational safety signs.
3/22/2018	WRPS-PER-2018-0706	Compliance Team Corrections	<p>Compliance Team corrections for the time period of 01/02/18 thru 03/20/18</p> <p>While HPT's were performing weekly surveys and WRPS Management Personnel were performing field observations, for the allotted time period, the following deficiencies were identified and forwarded to the compliance team:</p> <ol style="list-style-type: none"> <li>1) It was reported that there were several signs (URMA-Pipeline, 600-269-PL and Buried Dangerous Waste Pipe) that were faded and needed to be replaced on WIDS line 600-269-PL.</li> <li>2) It was reported that there were several (URMA-Pipeline) signs that were faded and needed to be replaced on WIDS line 200-W-130-PL.</li> <li>3) It was reported that there were some (RBA) signs on the Vehicle Entrance gate at C-Farm that were faded and needed to be replaced.</li> <li>4) It was reported that there were some (URMA) signs on UPR-200-E-78 that were faded and needed to be replaced.</li> <li>5) It was reported that there was an (URMA) sign at 151-ER that was faded and needed to be replaced.</li> <li>6) It was reported that there were several signs (URMA-Pipeline and 200E-111-PL) on WIDS line 200-E-111-PL that were faded and needed to be replaced.</li> <li>7) It was reported that there were several signs (200-E-114-PL, URMA and URMA-Pipeline) that were faded and needed to be replaced on WIDS line 200-E-114-PL.</li> <li>8) It was reported that there were a couple signs (CA and URMA) at 152-ER that were faded and needed to be replaced.</li> <li>9) It was reported that there were several (URMA-Pipeline) signs on WIDS line 200-E-147-PL that were faded and needed to be replaced.</li> <li>10) It was reported that there were some missing RMA number signs (WRPS-RMA-191) on WRPS-RMA-191 by the T-Evaporator.</li> <li>11) It was reported that there were several (URMA-Pipeline) signs on WIDS line 200-W-129-PL that were faded and needed to be replaced.</li> <li>12) It was reported that there were a few (URMA-Pipeline) signs on WIDS line 200-W-130-PL that were faded and needed to be replaced.</li> <li>13) It was reported that there was an (UPR-200-W-113) sign on WIDS Area UPR-200-W-113 that was faded and needed to be replaced.</li> <li>14) It was reported that several FCA stickers (E-45-012, W-80-042 and W-80-008) were faded and needed to be replaced. The stickers were located on FCA's North of 244-AR, on the Old Cross-site Transfer line and in 2707-SX Carpenter's Shop.</li> <li>15) It was reported that B-Farm had excessive Tumbleweeds inside of it and that they needed to be picked up.</li> <li>16) It was reported that BX-Farm had excessive Tumbleweeds inside of it and that they needed to be picked up.</li> <li>17) It was reported that there were several signs (URMA and UPR-600-20) that were faded and needed to be replaced on WIDS site UPR-600-20.</li> <li>18) It was reported that there were several signs (URMA-Pipeline and 600-284-PL) that were faded and needed to be replaced on WIDS line 600-284-PL.</li> <li>19) It was reported that there was excessive Tumbleweeds inside C-Farm and that they needed to be picked up.</li> <li>20) It was reported that there was an incorrect R&amp;A sign (for dose control) on the vehicle entrance gate into SX-Farm and it needed to be replaced.</li> <li>21) It was reported that there were a few (RMA) signs on WRPS-RMA-055 that were faded and needed to be replaced.</li> <li>22) It was reported that there were a few signs (FCA-W-80-043 and RMA) in WRPS-RMA-093 that were faded and needed to be replaced.</li> <li>23) It was reported that there were a few signs (RMA and WRPS-RMA-084) in WRPS-RMA-084 that were faded and needed to be replaced.</li> <li>24) It was reported that there were Temporary signs (RBA) on the AZ Vehicle Entrance Gate that needed to be replaced with Permanent (RBA) signs.</li> <li>25) It was reported that there were several Temporary (RMA) signs around WRPS-RMA-181 at C-Farm that needed to be replaced with Permanent (RMA) signs.</li> </ol>

3/22/2018	WRPS-PER-2018-0705	Attended Fact Finding Meeting for LOTO Boundary Violation During POR127 Filter Change	<p><b>Title:</b> Attended Fact Finding Meeting for LOTO Boundary Violation During POR127 Filter Change</p> <p><b>Summary:</b></p> <p>The Fact Finding Team Leader introduced herself, facilitated introductions of attendees, and then discussed the purpose of the meeting, emphasizing that the meeting objective is to establish a timeline and facts and not to place blame. The FWS discussed his timeline of events, and stated that he mentioned in the pre-job brief that the LOTO boundary would be the ARA boundary on the work platform. After the boundary was established, a worker noticed that (b)(6) and alerted the FWS. The FWS questioned (b)(6), and another (b)(6) stated that he too (b)(6). The work was stopped, the crew exited AX farm, and the FWS notified the CSM.</p> <p>(b)(6) stated that they were running about 10 minutes behind the crew, and that the work area was already setup by the time they arrived on the work platform. One of (b)(6) had never been on a LOTO, and the other (b)(6) had never been an AW on an S-criteria checklist (b)(6) stated that the ARA/LOTO boundary was not posted when they entered the work boundary, and (b)(6) stated that the area is not posted until the crew is ready to begin work.</p> <p>(b)(6) stated that he believed that the work crew had perceived time pressure, and (b)(6) appeared to become defensive and declared that he never time pressures (b)(6) and has respect for LOTO. Another (b)(6) clarified that individual crafts feel time pressure when they are late to a job due to circumstances that they are unable to control, or when they forget something or their equipment malfunctions. (b)(6) said that they felt rushed and a meeting attendee noted that there was no discrete point in time or communication that took place prior to establishing the LOTO boundary.</p> <p>The LOTO SME said that a LOTO boundary could be established with the use of a sign, rope with posting, or a designated attendant. (b)(6) again appeared defensive, stating that he emphasized the LOTO boundary being the ARA boundary in the pre-job brief. (b)(6) stated that it is the responsibility of the AW to understand the LOTO boundary or ask questions. Additionally, (b)(6) stated that he did not feel it was necessary to designate someone to control the LOTO boundary, and an NCO stated that adding additional signage is unnecessary.</p> <p>A meeting attendee emphasized that the LOTO procedure requires a sign, rope, or designated attendant to control the LOTO boundary (OFI). Another meeting attendee pointed out that the crew did a good job of recognizing that the IHTs did not hang their AW locks and stopped when appropriate. (b)(6) asked when the crew could get back to work, and management stated that further dialogue is necessary prior to continuing. The meeting leader provided a brief summary of the meeting and stated that attendees will receive the final report.</p> <p>The FR concluded that (b)(6) was defensive and (b)(6) and that (b)(6) believes that (b)(6). Additionally, the FR determined that DOE-0336 was violated when safe-to-work checks were not performed prior to the CWA being established and when AWs failed to install their locks prior to the CWA being established. The FR discussed observations with WRPS and ORP management, and WRPS management stated that the work would not continue until (b)(6) management concurrence.</p> <p>Issue Type: OFI (Opportunity for Improvement) Significance Level: 2</p>
3/22/2018	WRPS-PER-2018-0709	Reviewed WRPS-PER-2018-0071	<p><b>Title:</b> Reviewed WRPS-PER-2018-0071</p> <p><b>Summary:</b></p> <p>Met with WRPS to discuss WRPS-PER-2018-0071</p> <p>WRPS-PER-2018-0071 was initiated on 01/10/2018, reporting that:</p> <p>"Construction worker trying to pump water uphill into AX-03B pit using the suction side of the pump. Construction workers consider this to be "Skill of the Craft". No labels, procedure and obviously no training on how a pump works is required. The skid or water buggy has two places to connect a water hose, one is gravity drain on suction side and one on discharge side worker choose wrong one and workers in the field were waiting until problem was resolved."</p> <p>The FR reviewed the approved list of skill-of-the-craft (SOC) work posted on the work planning and control. This activity was not listed. The FR then followed up with WRPS to see if the appropriate approvals had been obtained to proceed and action initiated to add this work to the SOC list. WRPS staff informed the FR that the initiator of the PER used incorrect language, that this work was not SOC, and that it was Level 4 work performed in support of the Level 2 work order WO-327348.</p> <p>TFC-OPS-MAINT-C-01, Tank Operations Contractor Work Control, states that:</p> <ul style="list-style-type: none"> <li>- Level 4 work activities must meet the criteria identified in Attachment A of this procedure, and identified on the Authorized Level 4 Activities List located on the Work Planning &amp; Control Website; and,</li> <li>- If Level 4 activities are required within the scope of a Level 1, 2, or 3 planning activity the Level 4 activities will be directed via action steps in the instructions to ensure an appropriate hazard analysis has been performed on the entire scope of the Level 1, 2, or 3 planning activity and appropriate controls implemented.</li> </ul> <p>During discussion with WRPS, it was determined that operation of the water buggy, or generic activities describing it, is not on the list of WRPS Authorized Level 4 Activities (Revision 1). The item most similar to this activity is item 22, which allows vehicle and equipment fueling, inspections, maintenance, and basic repair. While the FR concurs that fueling, inspections, maintenance, and basic repair of the water buggy would appropriately be categorized as Level 4 work, the use of the water buggy to supply water in support of a higher level work order falls outside the scope of this authorization.</p>
3/22/2018	WRPS-PER-2018-0710	Failure to Categorize An Occurrence Within 2 hours Following Discovery	<p><b>Title:</b> Failure to Categorize An Occurrence Within 2 hours Following Discovery</p> <p>On 3/20/18 at 1430, in preparation for shipment of reusable contaminated equipment stored at 2713 WB "Green Hut", total contamination exceeding the reporting criteria was discovered on exterior surfaces of a sleeving tensioner and on a top hat lid.</p> <p>On 3/21/18, telephone notification was made to (b)(6) in the Central Shift Office. Based on the removable contamination levels discussed in the phone conversation, (b)(6) the event to be non-reportable. A Problem Evaluation Report (WRPS-PER-2018-0690) was submitted on 3/21/18 at 1412 hours and (b)(6) still focused on removable contamination levels, (b)(6) as non-reportable at 1658 hours.</p> <p>On 3/22/18 at 0945, upon further consideration and consultation with the Occurrence Reporting Specialist, (b)(6) declared the event as Group 6 - Contamination/Radiation Control, Subgroup B - Spread of Radioactive Contamination, L due to total (fixed plus removable) contamination levels exceeding 50,000 dpm/100cm2.</p>

3/22/2018	WRPS- PER- 2018- 0703	Investigation of Missed OSD Readings in Last 6 Months	Quarterly trend analysis of PER data identified a 10 instances of missed OSD readings over the past 6 months. This was identified as a focus area at the 1/2018 CSR presentation of Conduct of Operations trend data. The path forward was to perform an assessment FY2018-OPS-MD-0370, Assessment of the WRPS Operations Compliance Culture to identify if missed OSD readings are a precursor to missed TSR readings. The assessment identified that no causal analysis is performed for any of the instances of missed OSD readings. All PER's for missed OSD readings are Trend Only or TUF's (with little or no evaluation performed.) no correlation could be made based on lack of information regarding cause. Missed OSD readings appear to be an expected and accepted condition.
3/22/2018	WRPS- PER- 2018- 0711	222-S Contaminati on on Shirt and Skin of WRPS employee	Identified non-reportable contamination levels on worker's shirt (18,000 dpm/100cm2 beta-gamma / no alpha) as well as on skin (8,000 dpm/100cm2 beta-gamma / no alpha) following a PCM alarm.
3/22/2018	WRPS- PER- 2018- 0713	ETF SALDS Manhole #8 Damaged	<p>ETF SALDS Manhole #8 damaged MSA construction subcontractor damaged SALDS MH #8 during installation of a sewer line running between 200 East and 200 West.</p> <p>***** NOTE: The manhole number in question was erroneously identified as #8 - when it is actually #10. (b)(6) 04/16/2018, TUF Tab *****</p>

3/22/2018	WRPS- PER- 2018- 0712	AY-101, new indications of internal corrosion were identified.	During ultrasonic testing (UT) operations to scan the primary tank wall from within the annulus of tank AY-101, new indications of internal corrosion were identified. The UT measurements showed up to ~26% localized thinning in the nominal 0.5 inch thick steel plate in the area of past liquid-air interface levels within the tank. The remaining tank wall thickness in the areas with measured localized thinning exceed the required thickness for structural integrity as identified in RPP-RPT-32238, "Hanford Double-Shell Tank Thermal and Seismic Project – Primary Tank Minimum Wall Thickness Analysis."
3/22/2018	WRPS- PER- 2018- 0715	ETF Valving issue	<p>Valve 68J-GV-01 on the WTP to TEDF transfer line was found out of position.</p> <p>On 2/15/18 ETF removed an administrative lock on 68J-GV-01 and opened the valve. The valve was opened in preparation for a batch transfer from WTP to TEDF.</p> <p>On 3/22/18 ETF operations performed a valve line up in preparation for an upcoming transfer. Valve 68J-GV-01 was found in the partially open position. It is uncertain how the valve position changed from 2/15/18 to 3/22/18. ETF had not initiated any actions within that time frame to change valve position.</p>
3/24/2018	WRPS- PER- 2018- 0725	SOE noticed unlabeled valves	While performing a valve lineup for ETF-60I-003 the SOE noticed unlabeled valves called out on page 58 of ETF-60I-003 and had questions as to why the valves were not labeled.

3/26/2018	WRPS- PER- 2018- 0702	Work Package was Completed/ Approved/ Without Identifying All Waste Streams	A Work Package was completed/approved without identifying all of all waste streams being generated during the work evolution. The Waste Planning Checklist did not identify the generation of process liquid. The work package was subsequently reviewed and approved and released for work without the proper instruction for managing the container of process liquid.
3/26/2018	WRPS- PER- 2018- 0727	AZ-102 Leak Detection Pit is above OSD-7 maximum authorized limit	AZ-102 Leak Detection Pit is above OSD-7 maximum authorized limit reading of 23in.
3/26/2018	WRPS- PER- 2018- 0728	Training Scheduling Improvement Suggestion	Training scheduling improvement suggestion. I missed Waste Handling, Segregation and Packaging class 350560 on 3/26/2018. I looked at my calendar in outlook and the location was listed as "2752E Yakima Room." I failed to note the body of the calendar entry states the location had changed to 1810 Terminal Drive/Mt. Rainier. While I should have noted the location change it is suggested updates include the "calendar location" to help avoid missed classes due to this error likely situation.

3/26/2018	WRPS-PER-2018-0729	Issues Identified During Cleaning of BOC-FL-200 at ETF	<p>On 03/19/2018, (b)(6) was covering preventative maintenance activities for packages 199004 &amp; 380293 in the Thin Film Dryer room which is posted as Airborne Radioactivity Area (ARA), Radiation Area (RA) and Contamination Area (CA). During the pre-job briefing, (b)(6) asked how the air filter BOC-FL-200 was going to be cleaned (PM 199004). Maintenance personnel stated cleaning the filter was skill of the craft and they were going to use a wire brush.</p> <p>Upon review of the skill of the craft list for Plumbers/Pipe Fitters, it is noted that Repair, replace, clean filters and filter assemblies (in-line filters) is listed, but the list specifically states "However, when these activities are within the scope of a Level 1, 2, or 3 work package they must be included in the work instructions thru an action step to ensure hazards associated with performing the activity have been analyzed and appropriate controls implemented". When I reviewed the procedure ETF-EL23002 Inspection and Maintenance of Drum Handling System 80C which ties to PM 199004, work step 5.4.2 states INSPECT AND CLEAN air filter (BOC-FL-200) on air supply to solenoid Valve. There are no instructions on how to clean the filter (this is an issue in an ARA especially with a wire brush). Although craft personnel did not clean the filter, the procedure needs to be changed to address how to clean the filter.</p> <p>Upon checking the EAM system, the wrong RWP (LE-003) was listed for PM 199004, although the correct RWP (LE-001) was in the work package. Upon checking the current Radiological Risk Screening Form, RWP LE-001 was identified as the correct RWP.</p> <p>Upon further review of Procedure ETF-EL23002 Inspection and Maintenance of Drum Handling System 80C, it was noted that Radiological Control is not on the required reviewer list.</p>
3/26/2018	WRPS-PER-2018-0654	222-S Lab 207-SL Retention Basin Requiring QA Oversight for Assessment Program	<p>During a QA surveillance of the annual multi-media sampling of the wastewater in the 222-S Laboratory 207-SL retention basin it was discovered that the Quality Assurance Organization has not performed QA oversight to identify each assessment element and the frequency of each assessment; the position or individual responsible for each assessment; the qualifications, responsibilities, authority, and accountabilities of the assessor(s); the format of the assessment; action owners(s); expectation for timely corrective action; expectation for timely closure of the corrective action; follow-up actions required and associated dates; and <b>required distribution for all related documentation.</b></p> <p>An assessment program needs to be established for the multi-media sampling program for assessing the production of useful, accurate data that meet the data quality objectives of the projects and that are generated per the requirements of HASQARD. Independent assessments, or at the very least QA surveillances, can furnish the independence needed to fulfill an unbiased evaluation against the HASQARD requirements. This very QA surveillance is a great start to establishing an assessment program, since rather than being a snapshot in time, this surveillance is more akin to an independent assessment because of its comprehensive, performance based approach and evaluation against the requirements of HASQARD, Volumes 1 and 2, Rev. 3, and the independent nature of the QA assessors who have no responsibility for maintaining the QAPP for the multi-media sampling program and the sampling procedures. Individuals other than QA staff may participate in these independent assessments and QA surveillances.</p>
3/26/2018	WRPS-PER-2018-0655	222-S Lab 207-SL Retention Basin Sample Not Following Collection Practice Procedure	<p>During a QA surveillance of the annual multi-media sampling of the wastewater in the 222-S Laboratory 207-SL retention basin it was observed that the volatile organics (VOA) and semi-volatile organics (SVOA) samples collected in glass vials and glass bottles, respectively, were not chilled until all other samples had been collected, the smears from the outsides of all of the vials and bottles had been counted for radioactivity, and the counting results showed there to be no contamination on the outside surfaces of the vials and bottles. The VOA and SVOA samples were the first samples to be collected, and were placed in an open air container for the remainder of all sampling with no attempt at having them chilled or shielded from the sun. The VOA samples could have been exposed to the sun for two or more hours, potentially causing a slight rise in their internal temperatures due to radiant heating from the sun. While this is not a concern for the <b>day of sampling because the outdoor temperature was below freezing, it would be a concern on a hot day.</b></p> <p>Because of the potential for loss of organic vapors from sampling sites, the multi-media sampling procedure (TO-080-750) calls for collection of VOA and SVOA samples before collection of other samples, unless specified otherwise in the sampling plan. If the sampling order cannot be altered from the procedure <b>directions, then it's recommended that the VOA and SVOA samples be chilled in the temporary container and the container be covered with a lid to keep the samples out of the sun until all other samples have been collected at the sampling site.</b></p>

3/26/2018	WRPS-PER-2018-0730	ETF FCA Postings, Survey Instructions for instrumentation, and Instructions for Donning/Doffing	<ol style="list-style-type: none"> <li>1. During the performance of Wrench Time and Walk your Spaces MOPs for ETF, discrepancies were identified with FCA Labeling and Survey &amp; Donning/Doffing Instructions.</li> <li>2. Contrary to TFC-ESHQ-RP_MON-C-17, Fixed Contamination Areas, FCA Labels are utilized in lieu of FCA Postings.</li> <li>3. Survey Instructions for Instrumentation and Donning/Doffing Instructions need to be evaluated for programmatic compatibility.</li> </ol>
3/26/2018	WRPS-PER-2018-0656	222-S Lab 207-SL Logbook/Field Notes Best Practice Process Improvement	<p>During a QA surveillance of the annual multi-media sampling of the wastewater in the 222-S Laboratory 207-SL retention basin it was discovered that the sampling crew makes temporary field notes on paper that are later that day recopied into the official field logbook. Although the convenience of taking field notes and recopying them into the logbook at the end of the day is understandable, this practice introduces the opportunity for making copying errors. Even though there is no hard and fast rule regarding recopying notes, best practice would be to tape "field" notes on one side of the logbook and recopy, adding additional insights, onto the facing page. This observation is a recommendation to improve processes and alleviate opportunities for error.</p>
3/26/2018	WRPS-PER-2018-0731	TFC-ESHQ-Q_ADM-C-02, Nonconforming Item Reporting and Control implies that any WRPS employee can initiate an NCR	<p>Procedure TFC-ESHQ-Q_ADM-C-02, Nonconforming Item Reporting and Control implies that any WRPS employee can initiate an NCR. A field vs. drawing discrepancy is a condition adverse to quality where an NCR should be initiated and yet only two such NCRs were initiated in the last year. All such NCRs were originated by QA personnel. If any employee can initiate an NCR, it would seem that HGET - or some employee training - should discuss NCRs along with PERs and how they relate as well as how and when to initiate either (it's understood that PERs are already well covered by current training).</p>

3/26/2018	WRPS- PER- 2018- 0732	While grouting, Saltwell Screen became buoyant and floated to the surface	While grouting the AX-102-D Riser 01C Saltwell Screen under WO-382621, the Saltwell Screen became buoyant and floated to the surface.
3/26/2018	WRPS- PER- 2018- 0734	Monthly RMA Inspections Not Completed	A review of RMA inspection sheets submitted by RMA Custodians for Production Operations identified that two RMA's had not received their monthly RMA inspection for January or February 2018. WRPS-RMA-164 at the north side of T-Farm by the vehicle gate and WRPS-RMA-169 the UX-302A offload area at SY Farm. The RMA Custodian has been contacted, March inspections completed without issue, and local tickler's updated to ensure all RMA locations have been included.
3/26/2018	WRPS- PER- 2018- 0505	Duplicate PER Should be Invalidated	Person on the outside of the CA boundary reached across the boundary rope and picked up a sample bottle. Another incident took place with (b)(6) on the inside of the CA, appropriately dressed in white anti contamination clothing, wiped his nose and face across the sleeve. MOP-2016-0624

3/27/2018	WRPS- PER- 2018- 0736	LERF contaminat ed tumbleweed	<p>During the performance of a Scheduled Radiation Survey Task Description (LE-W098) at LERF, a contaminated tumbleweed was discovered.</p> <p>Total Contamination of:</p> <p>Outside NE corner of Basin 44 posted Contamination Area: (Inside a posted Soil Contamination Area)</p> <p>Location # 1: 517,000 dpm/100 cm2 Beta-Gamma and &lt;500 dpm/100 cm2 Alpha,</p> <p>No removable contamination was detected. The tumbleweed fragments were properly disposed of.</p> <p>Survey results are documented in Survey Simple on survey # LE-1800580</p>
3/27/2018	WRPS- PER- 2018- 0741	Stairs Exiting and Entering Change trailers do not meet required code	<p>Approximately one year ago, multiple Stairs Exiting and Entering Change trailers were replaced with Metal Stairs. In the last couple of weeks, three of these stair sets have been found to be deficient per code and have been taken out of service pending repair. One, (entering into B Change trailer was found to have greater than 1/2 inch between the trailer exit and the first tread. The two sets of stairs exiting the AP change trailer were also deficient due to the last step not being equi-distant with the others stepping off onto the Pad.</p>
3/27/2018	WRPS- PER- 2018- 0742	Engineering to evaluate what limits should be used for the Quarterly Temperatur es(concrete	<p>During review of AN Team Quarterly Temperature rounds it was noted that the Data sheet printed out in PCSACS uses the TSR limits listed in HNF-IP-1266 Table 5.9.1-1( Flam Gas). The readings taken are all concrete temperature thermocouples. I am not sure we should be using AC 5.9.1 TSR limits for waste temperature as a control for Quarterly Concrete Temperatures. OSD-07 has temperature limits for concrete for dome and wall. I believe these are the limits that should be listed in the AN Quarterly Temperature Rounds (rounds generated in PCSACS).</p>

3/27/2018	WRPS- PER- 2018- 0748	222-5 Planning Procedure Compliance Issue Corrected Upon Discovery	<p>While performing MOP Reviewed the following work packages with a specific focus on confirming the activity is listed on the Skill of the Craft (SOC) list; proper Level 3 screenings were performed; no detailed work instructions were utilized; the work package had the appropriate approvals as required by TFC-OPS-MAINT-C-01, attachment B; approved supporting documents were attached in EAM; and the current status and location were accurate in EAM.</p> <p>Result for Work Order 363100: SOC - Met Screenings - Met No detail - Met Approvals - Not Met Documents in EAM - Met Current Status - Met Results for</p> <p>364026: SOC - Met Screenings - Met No detail - Met Approvals - Not Met Documents in EAM - Met Current Status - Met Results for</p> <p>350268: SOC - Met Screenings - Met No detail - Met Approvals - Not Met Documents in EAM - Met Current Status - Met</p>
3/27/2018	WRPS- PER- 2018- 0747	Updating Procedures for BTR's obtaining QAIP documentati on from QA	<p>Several months ago, I brought to the attention to 222-5 Laboratory Operations Manager that the Procurement Specialists has had to experience have to wait for completed QAIP documents required in order to complete AVS inspection process. I understood the Operations Manager conveyed this issue to the Quality Assurance Manager of this continued problem, which was addressed to the Quality Support Personnel to resolve this issue from reoccurring in the future.</p> <p>It was brought to my attention, by the Procurement Specialist this issue is still a problem. Contracts 64569 and 65105 are both still awaiting the required QAIP documents in order to allow AVS to process inspection without delay for delivery to end customer on Site. Per procedure TFC-ESHQ-Q_INSP-C-01, Rev B-10, 9/19/2016, 4.1, Step 2: "Arrange with the Buyers Technical Representative (BTR) to place an electronic copy of the QAIP in the COMM LOG of the associated Contract Requisition in Asset Suite."</p> <p>AND</p> <p>TFC-BSM-CP_CPR-C-03, 4.6.3</p>
3/27/2018	WRPS- PER- 2018- 0671	SY FarmA- Train experienced an unplanned shutdown	<p>Exhauster 296-5-25 A-Train experienced an unplanned shutdown on 3/15/2018 at 1355 hours after being switched over from B-Train.(296-P-23).</p>

3/27/2018	WRPS-PER-2018-0716	Assessment of the Waste Transfer Compatibility Program Signature missing	<p>The biennial management assessment of the Waste Transfer Compatibility Program - Safety Management Program FY2018-ENG-R-0180 (RPP-ASMT-62116) was completed.</p> <p>One Finding was identified:</p> <p>Design Authority signature is missing on two Software Management Plans, RPP-PLAN-60575, Rev. 6 and RPP-PLAN-60601, Rev. 2. TFC-ENG-DESIGN-C-32 specifically calls for the DA to review and record their signature as the Design Authority in section 4.2.4.1, step 2a of the procedure (as the Stage 1 document review), and again in section 4.2.5.1, step 2a (as the Stage 2 document review). The current SmartPlant Foundation workflow only allows for a single Design Authority signature, and the workflow does not assign a "workflow step" to the Design Authority to complete this review (step 1a/1b of section 4.2.4.1 of TFC-ENG-DESIGN-C-32). This oversight appears to prevent compliance with the procedure.</p>
3/27/2018	WRPS-PER-2018-0717	Assessment of the Waste Transfer Compatibility Program	<p>The biennial management assessment of the Waste Transfer Compatibility Program - Safety Management Program FY2018-ENG-R-0180 (RPP-ASMT-62116) was completed.</p> <p>An Observation 1-1 was identified:</p> <p>Several editorial changes are recommended to improve the effectiveness of the Waste Compatibility procedures.</p> <ul style="list-style-type: none"> <li>•The Engineer responsible for the evaporator process control plan (PCP) noted that it would be useful to have LCO's relevant to the evaporator put in a summary table so the person writing the PCP doesn't have to scan through the document to find them. For instance the Cesium limit is hard to track down. From CRAD1 Performance Criteria 1.</li> <li>•The wording of the criticality controls in CSP-T-149-00012 and HNF-SD-WM-OCD-015 are not an exact match as desired by the Criticality Safety Engineer. Changing the criticality control wording in HNF-SD-WM-OCD-015 so that it is a word for word match of CSP-T-149-00012 would improve the document from the perspective of the Criticality Safety Engineer. From CRAD1 Performance Criteria 4.</li> <li>•The 95% confidence interval is used to determine decision rules for PCBs and pH in HNF-SD-WM-DQO-001. The requirement is confusing because most values use an average and not a confidence limit. Clarifying the wording in Section 8 to reference the pH and PCBs, or deleting this paragraph, would help make the values used clear. If the min or max value should be used, that could be noted in the DQO. From CRAD1 Performance Criteria 5.</li> <li>•Should the caustic limit report (CLR) be listed as a possible source of information on HNF-SD-WM-DQO-001 and TFC-ENG-CHEM-P-13? BBI doesn't react hydroxide over time, and the CLR might be a more accurate estimate of the hydroxide concentration in some situations. From CRAD1 Performance Criteria 5.</li> <li>•TFC-ENG-CHEM-P-13, Section 4.2, Item 7 says to store the Excel file in a network location, should it also be stored in SmartPlant with the WCA report? It would help access the file if stored in SmartPlant. From CRAD1 Performance Criteria 6.</li> <li>•Should TFC-ENG-CHEM-P-13 be listed as an impacted or related document on HNF-SD-WM-OCD-015 DRCF? From CRAD1 Performance Criteria 7.</li> </ul>
3/27/2018	WRPS-PER-2018-0718	Assessment of the Waste Transfer Compatibility Program	<p>The biennial management assessment of the Waste Transfer Compatibility Program - Safety Management Program FY2018-ENG-R-0180 (RPP-ASMT-62116) was completed.</p> <p>An Observation 1-2 was identified:</p> <p>Several considerations are recommended to improve the effectiveness of the Waste Compatibility program.</p> <ul style="list-style-type: none"> <li>•The WCA DQO discusses taking duplicate field samples, but does not address what happens if duplicate samples are very different. Currently it is up to the WCA author to evaluate the difference and decide what the variability means to them. Is more guidance needed on how to deal with discrepancies in field duplicate samples? Is there a level of discrepancy that would cause one to say the sample results were invalid? From CRAD1 Performance Criteria 5.</li> <li>•HNF-SD-WM-DQO-001 mentions 100 gallons of saltwater is allowed for conductivity testing. It's likely a chloride specification is needed, but one does not currently exist. Is there a possible scenario where the 100 gallon volume could introduce too much chloride? If so do we need additional limits such as a maximum chloride concentration? Is the conductivity testing even relevant at this time? From CRAD1 Performance Criteria 5.</li> <li>•Evaluating different mixing scenarios is beyond the scope of the WCA. However, situations can arise when layer formation is problematic. It is generally up to the transfer engineers to anticipate and account for layers. Is there ever a case where considering layering of a transfer is needed within the WCA, or should the WCA better delineate the limitations of the assessment in regard to mixing? From CRAD1 Performance Criteria 6.</li> <li>•Recommend looking into further training of operation folks in how WCA program relates to them. This would help elevate the concern that some of the managers expressed that additions may be occurring in tank farm without WCA engineers' awareness, as well as the Criticality Safety Engineer's desire to better involve operations groups in the WCA program. From CRAD1 Performance Criteria 7.</li> <li>•The WCA may have an opportunity for improvement by purging legacy information. Some items were sighted such as the phosphate rule and conductivity testing additions that may no longer be relevant. From CRAD1 Performance Criteria 7.</li> </ul>

3/27/2018	WRPS- PER- 2018- 0719	assessment of the Waste Transfer Compatibility Program use	<p>The biennial management assessment of the Waste Transfer Compatibility Program - Safety Management Program FY2018-ENG-R-0180 (RPP-ASMT-62116) was completed.</p> <p>An Observation 2-1 was identified:</p> <p>With some relatively minor changes in Waste Compatibility Assessments, the Assessments could be easier to use by the Waste Transfer Engineers, the primary customer.</p> <ul style="list-style-type: none"> <li>• Checklist A-6006-676 lists the potential operating/process control document sources and LCDs, ACs, SACs, ACKEs, DFS, and DID features for the procedure. The WCA provides the applicable numbers for each of the identified administrative control numbers (e.g. 5.9.1) in Appendix A, "Waste Compatibility Compliance Table" and is used to assist with filling out the checklist. AC 5.9.5, identified in the row "Nuclear Criticality Safety (OCD 3.14) (AC 5.9.5)" is not included in the column "Reference Section". It is suggested to include "AC 5.9.5" in the Reference Section column for consistency with the other identified ACs. This will allow for ease of finding this AC when filling out Checklist A-6006-676.</li> <li>• Appendix B, which provides the input data for the Source and Receiving tanks and the final conditions of the receiver tank, tends to run together. Suggest to include a page break, blank page, split Appendix B into three separate appendices, or some other way to break up the three tables to easily depict between them.</li> <li>• Section 3.0 of the WCA provides an overview of the requirements and expected results of the transfers, which is very useful in completing the checklists associated with the transfer procedures. However, there is one item that is requested to be included in this section, which is the specific gravity. The specific gravity of the sending tank is needed in the waste transfer procedures to ensure that the flush requirements and critical velocity requirements are met. The critical velocity is stated in Section 3.0 of the WCA, however the specific gravity is not included in this section. This recommendation is to add the specific gravity of the sending tank along with the calculated expected final specific gravity of the receiving tank after transfer in Section 3.0. This information will be directly included in the checklists of the transfer procedures.</li> <li>• The titles of the WCAs are not specific as to which tank is the sending or receiving tank, and the titles do not have a specific order when listing the tanks. For example, "Waste Compatibility Assessment of Tank 241-AP-108 Waste with 241-AW-106 Waste." It is recommended to include words such as "for the AP-108 to AW-106 transfer" in the title to reflect what is analyzed in the WCA.</li> </ul>
3/27/2018	WRPS- PER- 2018- 0720	Assessment of the Waste Transfer Compatibility Program	<p>The biennial management assessment of the Waste Transfer Compatibility Program - Safety Management Program FY2018-ENG-R-0180 (RPP-ASMT-62116) was completed.</p> <p>An Observation 3-1 was identified:</p> <p>It is recommended that the following sections from HNF-SD-WM-OCD-015 be reviewed to confirm they are correctly being implemented in the Waste Compatibility Assessment spreadsheet, and then added to the Compliance_Table worksheet:</p> <ul style="list-style-type: none"> <li>• 3.1.1.1</li> <li>• 3.1.1.3</li> <li>• 3.1.1.5</li> <li>• 3.1.3.2</li> <li>• 3.2.4</li> <li>• 3.5.1.4</li> </ul> <p>A handful of items listed in HNF-SD-WM-OCD-015 are not directly addressed in the compliance table in the VerifiedOCD-015-45-38.xlsx file. These include sections 3.1.1.1, 3.1.1.3, 3.1.1.5, 3.1.3.2, 3.2.4, and 3.5.1.4. Following discovery of these items, the Project Lead for the spreadsheet was interviewed and the items were discussed in detail. The resulting discussion revealed that the sections were covered by elements of the spreadsheet, but simply not referenced directly.</p>
3/27/2018	WRPS- PER- 2018- 0721	Assessment of the Waste Transfer Compatibility Program spreadsheet s	<p>The biennial management assessment of the Waste Transfer Compatibility Program - Safety Management Program FY2018-ENG-R-0180 (RPP-ASMT-62116) was completed.</p> <p>An Observation 3-2 was identified:</p> <p>For four of the five spreadsheets, it is recommended that the HISI entries for the spreadsheets complete the Owner review step, as necessary.</p>

3/27/2018	WRPS- PER- 2018- 0722	Assessment of the Waste Transfer Compatibility Program checklist	<p>The biennial management assessment of the Waste Transfer Compatibility Program - Safety Management Program FY2018-ENG-R-0180 (RPP-ASMT-62116) was completed.</p> <p>An Observation 3-3 was identified: For four of the five spreadsheets, it is recommended that software grading checklist comment sections be revised to specify which checklist questions have been answered "Yes" and to include the discussion as to why. This observation is captured in WRPS-PER-2018-XXXX.</p>
3/27/2018	WRPS- PER- 2018- 0723	Assessment for WCA during retrievals	<p>The biennial management assessment of the Waste Transfer Compatibility Program - Safety Management Program FY2018-ENG-R-0180 (RPP-ASMT-62116) was completed.</p> <p>An Observation 4-1 was identified: A suggestion was made concerning the need to modify a WCA during retrievals after decanting has been performed on a DST before the retrieval is allowed to continue. It was suggested that since decants are planned, a single WCA could be performed that would be sufficient for retrievals both before and after decanting.</p>
3/27/2018	WRPS- PER- 2018- 0751	Contaminati on in an SCA by B Farm.	<p>Discovered contamination in an SCA while performing the annual routine survey BOS-A007. Contamination appeared to be tumbleweed fragments. Direct readings ranging from 4,000-300,000dpm/100cm<sup>2</sup> beta, no alpha, no transferrable and no smearable contamination detected. SCA is in WIDS# 200-E-120 East of 241-B Farm.</p>

3/27/2018	WRPS-PER-2018-0697	242-A C-A-1 Vessel Spray Nozzle Removal	<p>ECN-713841, Rev. 0, "242-A C-A-1 Vessel Spray Nozzle Removal" has been issued. This ECN does not have a review/approval involving environmental.</p> <p><b>Concern:</b> The Evaporator Vessel is part of a system that treats or stores dangerous waste. Any changes to this system should involve environmental so the changes may be reviewed for impacts to existing permits. In this circumstance, the Operable Unit Group 4, 242-A Evaporator portion of the Hanford Site Wide RCRA permit. In addition, design changes may also trigger other needs rooted in environmental requirements such as involvement of an IQRPE or additional permitting actions.</p> <p>As of the date of submittal of this PER (03/27/2018); the changes identified in ECN-713841, Rev. 0 have not been made to the identified facility systems.</p>
3/27/2018	WRPS-PER-2018-0752	grab air sampler was used after the calibration had expired	<p>A grab air sampler was used after the calibration had expired. The air sampler was used on 03/27/18 and expired on calibration on 09/14/17.</p> <p><b>Summary of events:</b></p> <p>On 3/27/18 (b)(6) and (b)(6) made an entry into the Thin Film Dryer Room at the Effluent Treatment Facility (2025E) to perform routine calibrations. The Thin Film Dryer Room is a posted Contamination Area (CA), Radiation Area (RA) and Airborne Radioactivity Area (ARA).</p> <p>Approximately 40 minutes after entering the room, (b)(6) discovered that the calibration on the air sampler was expired. The personnel immediately exited the room and exercised normal anti-contamination clothing doffing procedures. All three personnel were working under Radiological Work Permit (RWP) LE-001. They were wearing hooded Powered Air Purifying Respirators (PAPRs). (b)(6) was wearing a lapel air sampler.</p> <p>Preliminary results indicate that the lapel air sampler registered 0.002 DAC (well within the protection factor of the PAPRs). The Thin Film Dryer Room is a small space and the lapel air sampler on (b)(6) is representative of the other two individuals.</p> <p>Removable contamination in the room was 1,500 dpm/100cm<sup>2</sup> beta-gamma and &lt; 20 dpm/100cm<sup>2</sup> alpha (Survey Report LE-1800589). Based on the radiological characterization for the facility (RPP-RPT-59760), the primary nuclides present are Sr-90, Cs-137, mixed uranium and tritium. There are no alpha-emitting transuranic nuclides in appreciable quantities. Therefore, the removable contamination levels observed are well below the values that could credibly generate airborne radioactivity due to simple resuspension.</p> <p>The Thin Film Dryer Room is posted as an Airborne Radioactivity Area for precautionary purposes and history indicates the average airborne concentrations are well below 0.2 DAC (RPP-RPT-59760). There were no events on 03/27/18 that could credibly have generated airborne radioactivity. There is no immediate concern of an internal deposition to the workers based on the low removable contamination levels, negative indication on the lapel air sampler, and the protection factor provided by the hooded PAPRs.</p> <p>It appears the air sampler was expired on its calibration because it could not be located when it came due for calibration. As a result, the repetitive work package for calibration was suspended and the air sampler was not calibrated. Further investigation is warranted to verify the accuracy of this conclusion.</p>
3/27/2018	WRPS-PER-2018-0753	222-S RMA Sign Missing from Connex Box RMA	<p>Radioactive Material Area WRPS-RMA-199 was identified to be missing the required RMA posting during a walkdown of RMAs at 222-S labs.</p>

3/28/2018	WRPS-PER-2018-0754	Tank Farm Access Found Unlocked and Unattended	<p>PER TITLE: Tank Farm Access Found Unlocked and Unattended.</p> <p>Title: Performed Pre-Transfer Readiness and Housekeeping Tour</p> <p>Summary: FR performed a walk-down of AP farm and the general vicinity to assess preparations for an upcoming DST transfer, as well as to support an ongoing housekeeping surveillance. Housekeeping issues noted were a general buildup of tumbleweeds in various areas, as well as miscellaneous equipment and materials accumulating in the farm around the exterior fence line. Also observed is what appeared to be an old flanged tank riser connection that was laying on the ground inside AP Farm. FR also inspected the southeast and east side of A Farm. Similar issues of tumbleweed buildup were noted on the north end of A Farm. Photos are attached, and these housekeeping observations will be rolled up in the larger ongoing housekeeping surveillance.</p> <p>-----</p> <p>Issue Type: Finding (Level 3) Significance Level: 1</p> <p>Statement: 36030-TF-F01. Tank Farm Access Found Unlocked and Unattended. (Priority Level 3, Scrabeck)</p> <p>Discussion: While conducting a housekeeping and readiness inspection in the tank farms on March 16, 2018, FRs discovered the gate on the southeast corner of A-Farm unsecured. No workers were in the area, and there was no attendant at the gate. The FRs remained in the area for several minutes and verified that there was no ongoing work or attendants in the area. Shift Management was informed of the unlocked gate to ensure it was promptly secured.</p> <p>Requirements: TFC-OPS-OPER-C-04, Access and Key Control For Operation Facilities 4.1 Access and Key Control 43. Personnel must ensure that doors/gates are locked and secured. a. Only authorized personnel shall gain access to tank farm facilities. Access is authorized by the Shift Manager. 50. Ensure the facility is locked and secured when leaving the facility un-staffed.</p> <p>REF: TOD Weekly 3-19-18; B Scrabeck; Finding Level 3; OA36030</p>
3/28/2018	WRPS-PER-2018-0755	An Opportunity Exists to Improve Ability for Personnel to Safely Enter Buildings Without Lighting	<p>PER TITLE: An Opportunity Exists to Improve Ability for Personnel to Safely Enter Buildings Without Lighting</p> <p>Title: Performed Pre-Transfer Readiness and Housekeeping Tour</p> <p>Summary: FR performed a walk-down of AP farm and the general vicinity to assess preparations for an upcoming DST transfer, as well as to support an ongoing housekeeping surveillance. Housekeeping issues noted were a general buildup of tumbleweeds in various areas, as well as miscellaneous equipment and materials accumulating in the farm around the exterior fence line. Also observed is what appeared to be an old flanged tank riser connection that was laying on the ground inside AP Farm. FR also inspected the southeast and east side of A Farm. Similar issues of tumbleweed buildup were noted on the north end of A Farm. Photos are attached, and these housekeeping observations will be rolled up in the larger ongoing housekeeping surveillance.</p> <p>-----</p> <p>Issue Type: OFI (Opportunity for Improvement) Significance Level: 1</p> <p>Statement: 36030-TF-O01. An Opportunity Exists to Improve Ability for Personnel to Safely Enter Buildings Without Lighting. (Scrabeck)</p> <p>Discussion: While conducting a housekeeping and readiness inspection in the tank farms on March 16, 2018, FRs noted the sign on the door for 241-A-701 building, which stated that the emergency light was out of service and that a flashlight is required for entry. Several flashlights were staged inside the door for use, however the batteries in all of them were dead. This building is accessed from time to time, as evidenced by a recently hung Danger tag inside. WRPS should evaluate what measures can be taken to ensure that the equipment staged to facilitate safe entry to this and similar facilities remains serviceable, to ensure safe entry of workers into these facilities.</p> <p>REF: TOD Weekly 3-19-18; B Scrabeck; OFI; OA36030</p>
3/28/2018	WRPS-PER-2018-0756	WRPS should consider development of a performance indicator on reduction of beryllium contamination (non-structures)	<p>PER TITLE: WRPS should consider development of a performance indicator on reduction of beryllium contamination (non-structures)</p> <p>Title: 18236-TF Contractor Assurance Review (CAR) - Be Q2</p> <p>Summary: DOCUMENTS REVIEWED: PER Assignment Weekly Report (Colby Smith): None Open PER (Beryllium): WRPS-PER-2015-2298, WRPS-PER-2016-0106, &amp; WRPS-PER-2016-2363 Red Arrow: Hollaender Hand Rail Fittings (Closed) WRPS Management Observation Program database: PDF search report WRPS Safety and Health Field Surveillance database: None WRPS email on FY-18, 2nd quarter evaluation of the WRPS beryllium program (Maintain and improve WRPS Be program): No new PER or stop works pertaining to beryllium; Issued TFC-ESHQ-S-STD-33, Implementation of DOE-0342, Chronic Beryllium Disease Prevention Program to include roles and responsibilities and required reading to address a ORP PL-3 Finding; Issued RPP-RPT-59441, Technical Basis to Correlate Beryllium Concentration to Radioactivity in Hanford Tank Farms, Rev 1 to increase scope of usage; Removed BCA conex box (CC1249) to ERDF (1st quarter red arrow); Scheduling actions to dispose PIBC gang boxes (WRPS-PER-2016-0106 corrective action); Developing work package for required activities to de-post 272-S (Beryllium Controlled Facility); drafted a periodic surface sampling procedure (in review); developing a work package (L-3) to facilitate ongoing beryllium sampling.</p> <p>OADB entry: 35130</p> <p>Draft WRPS IH Programs Beryllium and Verification Sampling trend performance indicator</p> <p>ORP CIH CAS REVIEW</p>

3/28/2018	WRPS- PER- 2018- 0757	242A End Of The Shift Facility Status Was Not Logged	SM reviewed A-1 logbook and noticed the end of the shift facility status was not logged. No further action is required. Screen is a trend only.
3/28/2018	WRPS- PER- 2018- 0759	2704HV Mask Station Parking	People who are not getting masks on the south side of 2704HV/200E continue to park their government vehicles in the Mask Issuing parking area. This causes heavy traffic congestion along with the foot traffic. Additionally, tank trucks and delivery trucks utilize this area compounding the congestion. Tempers have flared and near misses have been observed. Personnel management has addressed this issue with the building management of 2704HV but the same issues persist over time.
3/28/2018	WRPS- PER- 2018- 0758	Equipment not Properly Secured on Vendor Transport Trailer	On 3/27/18, steel platforms arrived on a trailer in the 200E Marshaling Yard where it was observed that the load had shifted on the transport trailer. The trailer was loaded in Blackfoot, ID on 3/26/18. Premier Technology, Inc. (PTI), the fabrication vendor, loaded the platforms onto a flat bed trailer of a second vendor, Idaho Truck Lines. During transportation the load shifted while traveling between AVS and the Wye Barricade. The transport driver stopped and tightened the load before proceeding to the 200E Marshaling Yard, where the load shift was discussed with the MSA hoisting and rigging personnel staged to off-load the platforms.

3/28/2018	WRPS-PER-2018-0743	A Potential for a Number of Latent Organizational Weaknesses to be Hidden from Management	<p>The PER Screening Team Needs More Guidance on Assigning Significance Level</p> <p>A management-directed assessment on Operations' compliance culture was conducted during the month of March, 2018 (FY2018-OPS-MD-0370).</p> <p>This assessment resulted in this Observation: There is a potential for a number of latent organizational weaknesses to be hidden from management by the lack of causal analysis on operational noncompliances. Before management can improve on the rate of noncompliances, the company needs to know what factors are contributing to them. Management may have unintentionally created two tiers of noncompliances between TSRs and OSD noncompliances by the use of "TUF" and "TO" for environmental and/or OSD noncompliances, although they are classified as "significant operational issues."</p> <p>Not all noncompliances need cause analysis but the screening team needs better instruction on how to determine their significance level to ensure the causes of noncompliances are determined when appropriate.</p>
3/28/2018	WRPS-PER-2018-0744	PERs Describing Noncompliances Need to Include Enough Detail	<p>PERs describing noncompliances need to include enough detail</p> <p>A management-directed assessment on Operations' compliance culture was conducted during the month of March, 2018 (FY2018-OPS-0370).</p> <p>This assessment resulted in this Observation: There is a potential for a number of latent organizational weaknesses to be hidden from management by the lack of causal analysis on operational noncompliances. Before management can improve on the rate of noncompliances, the company needs to know what factors are contributing to them. Management may have unintentionally created two tiers of noncompliances between TSRs and OSD noncompliances by the use of "TUF" and "TO" for environmental and/or OSD noncompliances, although they are classified as "significant operational issues."</p> <p>PERs describing noncompliances need to include enough detail to assist the screening team to properly assign significance levels or the "Further Evaluate" needs to be more liberally used by the screening team until they get the correct information.</p>
3/28/2018	WRPS-PER-2018-0745	The screening guidance in TFC-ESHQ-Q_C-C-01 should be revised	<p>The screening guidance in TFC-ESHQ-Q_C-C-01 should be revised</p> <p>A management-directed assessment on Operations' compliance culture was conducted during the month of March, 2018 (FY2018-OPS-MD-0370).</p> <p>This assessment resulted in this Observation: There is a potential for a number of latent organizational weaknesses to be hidden from management by the lack of causal analysis on operational noncompliances. Before management can improve on the rate of noncompliances, the company needs to know what factors are contributing to them. Management may have unintentionally created two tiers of noncompliances between TSRs and OSD noncompliances by the use of "TUF" and "TO" for environmental and/or OSD noncompliances, although they are classified as "significant operational issues."</p> <p>The screening guidance in TFC-ESHQ-Q_C-C-01 should be revised to capture any additional information the screening team may need to better differentiate noncompliance PERs that require cause analysis from TUF, TO and PIE PERs.</p>

3/28/2018	WRPS- PER- 2018- 0760	Update the WRPS Section 503 Affirmative Action Plan	<p>During the performance of assessment FY2018-WR-MD-0375 – Office of Federal Contract Compliance Program (OFCCP) Compliance Review, the following was identified:</p> <p>Finding 1. Update the WRPS Section 503 Affirmative Action Plan to add a section on Self-identification that details the WRPS self-identification for disabilities process.</p>
3/28/2018	WRPS- PER- 2018- 0761	Update the WRPS VEVRAA Affirmative Action Plan	<p>During the performance of assessment FY2018-WR-MD-0375 – Office of Federal Contract Compliance Program (OFCCP) Compliance Review, the following was identified:</p> <p>Finding 2. Update the WRPS VEVRAA Affirmative Action Plan to add a section "Use of an Online Application System" that details the WRPS Online Application System.</p>
3/28/2018	WRPS- PER- 2018- 0762	Affirmative Action Program Corrections	<p>During the performance of assessment FY2018-WR-MD-0375 – Office of Federal Contract Compliance Program (OFCCP) Compliance Review, the following was identified:</p> <p>Finding 3. Correct that WRPS senior management has not been informed on a regular basis of the effectiveness of Affirmative Action Program and policies and any recommendations for improvement. In addition, correct that the results of the affirmative action program have not been reviewed with all levels of management and meetings have not been held to explain the intent of WRPS's commitment to engage in affirmative action efforts.</p>

3/28/2018	WRPS- PER- 2018- 0763	Many Managers and Workforce Resource Employees Have Not Been Trained on Current Affirmative Action Plan	<p>During the performance of assessment FY2018-WR-MD-0375 – Office of Federal Contract Compliance Program (OFCCP) Compliance Review, the following was identified:</p> <p>Finding 4. Many personnel (Managers and Workforce Resources personnel) have not been trained on the current Affirmative Action Plan contents and its commitments.</p>
3/28/2018	WRPS- PER- 2018- 0764	Underutilized areas identified in the Affirmative Action Plan	<p>During the performance of assessment FY2018-WR-MD-0375 – Office of Federal Contract Compliance Program (OFCCP) Compliance Review, the following was identified:</p> <p>Finding 5. Progress reporting shows progress in all but two underutilized areas identified in the Affirmative Action Plan (AAP). Job group 1A Admin Mgr. and Job group 7H HP Tech showed no progress. It is recommended that the 2018 AAP identify additional steps to be taken to further address what action oriented programs and outreach efforts could be taken to help address utilization in these job groups.</p>
3/28/2018	WRPS- PER- 2018- 0765	Significant Difference/Disproportionate Fewer Number of Minorities Rated as Top Contributors Versus Non-Minorities	<p>During the performance of assessment FY2018-WR-MD-0375 – Office of Federal Contract Compliance Program (OFCCP) Compliance Review, the following was identified:</p> <p>Finding 6. A review of the 2017 and 2018 Performance Ratings shows a significant difference/disproportionate fewer number of minorities rated as Top Contributors versus non-minorities. Workforce Resources and management should engage in a thorough review of this process in future years to ensure there are no discriminatory practices occurring.</p>

3/28/2018	WRPS-PER-2018-0766	Increase tracking and enforcement of the completion and submittal of Performance Objective Planners	<p>During the performance of assessment FY2018-WR-MD-0375 – Office of Federal Contract Compliance Program (OFCCP) Compliance Review, the following was identified:</p> <p>Finding 7. Increase tracking and enforcement of the completion and submittal of Performance Objective Planners to achieve compliance with procedural requirements. Only 59% of required employees submitted/completed Performance Objectives for 2016.</p>
3/28/2018	WRPS-PER-2018-0767	Organization's EEO Manager Review and Update of Affirmative Action Plan	<p>During the performance of assessment FY2018-WR-MD-0375 – Office of Federal Contract Compliance Program (OFCCP) Compliance Review, the following was identified:</p> <p>Observation 1. The WRPS Affirmative Action Plan (AAP) needs to clearly state in Designation of Responsibility section that the organizations designated official (its Equal Employment Opportunity (EEO) Manager) reviews and updates the affirmative action program on an annual basis.</p>
3/28/2018	WRPS-PER-2018-0768	Update the WRPS Section 503 Affirmative Action Plan (AAP) and supporting documentation for clarity	<p>During the performance of assessment FY2018-WR-MD-0375 – Office of Federal Contract Compliance Program (OFCCP) Compliance Review, the following was identified:</p> <p>Observation 2. Update the WRPS Section 503 Affirmative Action Plan (AAP) and supporting documentation for clarity.</p> <ol style="list-style-type: none"> <li>1. Edit the two policy statements in the AAP and in the AAP for Individuals with Disability to clearly state "...include taking affirmative action to employ and advance in employment qualified individuals with disabilities at all levels, including the executive level".</li> <li>2. Add the word retaliation to the two Equal Employment Opportunity (EEO) policy statements. "In addition, employees and applicants are protected from harassment, threats, coercion, intimidation, retaliation, or discrimination..."</li> <li>3. List the EEO Manager as a person that can be contacted (on the bottom of the statement) on the EEO policy statement that comes out from WRPS President.</li> </ol>

3/28/2018	WRPS- PER- 2018- 0769	Verify the acceptability of the Equal Employment Opportunity (EEO) postings and validate the placement of these posted state	<p>During the performance of assessment FY2018-WR-MD-0375 – Office of Federal Contract Compliance Program (OFCCP) Compliance Review, the following was identified:</p> <p>Observation 3: Verify the acceptability of the Equal Employment Opportunity (EEO) postings and validate the placement of these posted statements (all locations), since it was found that the statement posted at 2425 Stevens Drive was found to be on normal letterhead in regular font and posted at the 6 foot level. It is required that the disability related EEO policy statement be posted on company bulletin boards be accessible and understandable to the individual with a disability, e.g., Braille, large print, or posting the notice at a lower height for a person.</p>
3/28/2018	WRPS- PER- 2018- 0770	Update the WRPS Section 503 Affirmative Action Plan Section "Review of Personnel Processes"	<p>During the performance of assessment FY2018-WR-MD-0375 – Office of Federal Contract Compliance Program (OFCCP) Compliance Review, the following was identified:</p> <p>Observation 4: Update the WRPS Section 503 Affirmative Action Plan Section "Review of Personnel Processes" to include the following additional statements:</p> <ol style="list-style-type: none"> <li>1. The organization ensures that applicants and employees with disabilities have equal access to your personnel processes including those implemented through information and communication technologies</li> <li>2. The organization provides reasonable accommodation to ensure applicants and employees with disabilities receive equal opportunity in the operation of personnel processes</li> <li>3. Add the word "periodically" to the first sentence in this section. "Washington River Protection Solutions periodically reviews its employment procedures to ensure careful thorough and ..."</li> </ol>
3/28/2018	WRPS- PER- 2018- 0771	Update the WRPS VEVRAA Affirmative Action Plan Physical and Mental Qualifications section	<p>During the performance of assessment FY2018-WR-MD-0375 – Office of Federal Contract Compliance Program (OFCCP) Compliance Review, the following was identified:</p> <p>Observation 5: Update the WRPS VEVRAA Affirmative Action Plan Physical and Mental Qualifications section to add a sentence that indicates that all medical information the contractor obtains as a result of such inquiries or exams is kept confidential, except as otherwise provided for in the regulations. In addition, the AAP "book" should contain all information on Physical and Mental Qualifications and Reasonable Accommodations in one section (a separate tab) for ease of finding the information.</p>

3/28/2018	WRPS- PER- 2018- 0773	Update the WRPS VEVRRA Affirmative Action Plan Audit and Reporting System section in the Individual with Disabilities Section	<p>During the performance of assessment FY2018-WR-MD-0375 – Office of Federal Contract Compliance Program (OFCCP) Compliance Review, the following was identified:</p> <p>Observation 6: Update the WRPS VEVRRA Affirmative Action Plan Audit and Reporting System section in the Individual with Disabilities Section to add a statement addressing the following:</p> <ol style="list-style-type: none"> <li>1. Frequency of the audit and reporting</li> <li>2. Who is responsible for implementing any corrective actions found from the audit</li> <li>3. How and when results of the audit are reviewed with management.</li> </ol>
3/28/2018	WRPS- PER- 2018- 0775	Communication of Equal Employment Opportunity Commission complaints between the EEO Manager and General Counsel's Office	<p>During the performance of assessment FY2018-WR-MD-0375 – Office of Federal Contract Compliance Program (OFCCP) Compliance Review, the following was identified:</p> <p>Observation 7. Communication of the existence, status, and outcomes of Equal Employment Opportunity Commission (EEOC) complaints between the EEO Manager and the General Counsel's Office could be improved. The review team suggests that that General Counsel's office coordinate with the EEO Manager on EEOC complaints relevant to the Affirmative Action Plan.</p>
3/28/2018	WRPS- PER- 2018- 0777	Affirmative Action Plan title descriptors for the job groups	<p>During the performance of assessment FY2018-WR-MD-0375 – Office of Federal Contract Compliance Program (OFCCP) Compliance Review, the following was identified:</p> <p>Observation 8. As a result of reviewing Affirmative Action Plan (AAP) data, it was found that the product could be improved by the use of consistent/better title descriptors for the job groups. Several appeared to not accurately describe the job group or had inconsistent titling in later sections of the AAP. For example, titles change from Utilization Summary to Applicant Flow:</p> <ol style="list-style-type: none"> <li>a) BE Manager changes to 1E Executive Managers</li> <li>b) BA Managers changes to 1A Administrative Managers</li> <li>c) BT Managers changes to 1T Technical Managers</li> <li>d) OA Operations Support Specialist changes to 2A Administrative Professionals</li> <li>e) QE Quality Assurance Technician changes to 3E Technician</li> <li>f) BE Electricians changes to something that captures Electricians, Painters Carpenters, Millwrights, Material Coordinators. Or, split out into separate groups, such as 6E – Other as it is defined in Applicant Flow section.</li> </ol>

3/28/2018	WRPS- PER- 2018- 0779	Affirmative Action Plan Job Group Sizes	<p>During the performance of assessment FY2018-WR-MD-0375 – Office of Federal Contract Compliance Program (OFCCP) Compliance Review, the following was identified:</p> <p>Observation 9. As a result of reviewing Affirmative Action Plan data, it was found that some job groups contained less than thirty (30) employees. It may be beneficial to perform a review of smaller job groups to see if they can/should be combined with other job groups for efficiency's sake. While there is no rule on size of job groups, typically a group size of less than thirty (30) would make any analysis statistically insignificant. Review smaller job groups to see if they should be combined with other job groups. For example,</p> <p>a) Job Group 2D - Design Specialist and 3D – Designer with only three (3) employees in total should be combined into one job group. Consider grouping with Job Group 2M Operations Specialist.</p> <p>b) Job Group 2G Security Specialist only has one (1) employee. Consider grouping with Job Group 2M Operations Specialist or 2A Operations Support Specialist.</p> <p>c) Job Group 5C Clerk has fifteen (15) employees and could be combined with Job Group 5S Executive Assistant which has twenty-two (22) employees.</p>
3/28/2018	WRPS- PER- 2018- 0781	Affirmative Action Plan: Job Groups Appear to Have Job Titles That Are Not A Good Fit Within The Job Group	<p>During the performance of assessment FY2018-WR-MD-0375 – Office of Federal Contract Compliance Program (OFCCP) Compliance Review, the following was identified:</p> <p>Observation 10. As a result of reviewing Affirmative Action Plan data, it was found that some job groups appear to have job titles that are not a good fit within the job group. Review the job groupings to see if there may be a better fit in another job group or if they should be in a standalone job group. For example, there are forty-seven (47) Project Control Engineers grouped with Job Group 2E Engineer. They don't really have a similar function or career progression as Engineers.</p>
3/28/2018	WRPS- PER- 2018- 0783	Affirmative Action Plan: census data and availability percentages used in availability calculations	<p>During the performance of assessment FY2018-WR-MD-0375 – Office of Federal Contract Compliance Program (OFCCP) Compliance Review, the following was identified:</p> <p>Observation 11. As a result of reviewing Affirmative Action Plan data, it appears that the census data and availability percentages used in the availability calculations don't make sense for all job groupings. In particular, job group 7H HP Tech has an availability percentage of 75% for Females. Please verify.</p>

3/28/2018	WRPS-PER-2018-0785	Affirmative Action Plan: data collection numbers on individuals with Disabilities (IWDs) is incorrect	<p>During the performance of assessment FY2018-WR-MD-0375 – Office of Federal Contract Compliance Program (OFCCP) Compliance Review, the following was identified:</p> <p>Observation 12. As a result of reviewing Affirmative Action Plan data, it appears that the data collection numbers on Individuals with Disabilities (IWDs) is incorrect and would need to be recalculated and submitted to ensure documentation is appropriately maintained. Data for IWDs includes:</p> <ul style="list-style-type: none"> <li>•Number of applicants</li> <li>•Total number of job openings</li> <li>•Total number of jobs filled</li> <li>•Total number of applicants for all jobs</li> <li>•Number of applicants with disabilities hired for all jobs</li> <li>•Total number of applicants hired for all jobs.</li> </ul>
3/28/2018	WRPS-PER-2018-0787	Affirmative Action Plan: The outreach log for Veterans has the wrong title (shows as outreach for Disabled)	<p>During the performance of assessment FY2018-WR-MD-0375 – Office of Federal Contract Compliance Program (OFCCP) Compliance Review, the following was identified:</p> <p>Observation 13: The outreach log for Veterans has the wrong title (shows as outreach for Disabled).</p>
3/28/2018	WRPS-PER-2018-0789	Communication with Represented Job Groupings	<p>During the performance of assessment FY2018-WR-MD-0375 – Office of Federal Contract Compliance Program (OFCCP) Compliance Review, the following was identified:</p> <p>Observation 14. To improve outreach for represented job groupings, WRPS should include the Unions in outreach efforts on a regular basis. It is recommended that WRPS send to the Unions information that states which represented job groupings are underutilized each year and remind them of underutilization for any postings in those underutilized job groups.</p>

3/28/2018	WRPS- PER- 2018- 0791	Applicant Flow Data Inaccuracies	<p>During the performance of assessment FY2018-WR-MD-0375 – Office of Federal Contract Compliance Program (OFCCP) Compliance Review, the following was identified:</p> <p>Observation 15: Applicant Flow data is incorrect for job group 7D (Operative Services).</p>
3/28/2018	WRPS- PER- 2018- 0792	Action Oriented Programs Noncompliance	<p>During the performance of assessment FY2018-WR-MD-0375 – Office of Federal Contract Compliance Program (OFCCP) Compliance Review, the following was identified:</p> <p>Observation 16: Action Oriented Programs list the following activities that are supposed to be completed and they are only partially complete.</p> <ol style="list-style-type: none"> <li>1. At least annually, a detailed analysis of position descriptions is conducted</li> <li>2. Individuals who have a role in the selection process are provided any necessary on-going training to ensure that the selection processes remain nondiscriminatory</li> <li>3. All Developmental Planners are not complete.</li> </ol>
3/28/2018	WRPS- PER- 2018- 0794	Recommended Changes to the Employment Staffing Procedure	<p>During the performance of assessment FY2018-WR-MD-0375 – Office of Federal Contract Compliance Program (OFCCP) Compliance Review, the following was identified:</p> <p>Observation 17: The Employment Staffing procedure is generally acceptable and compliant with federal and state laws and provides sufficient structure and guidance to the employment process. Some changes to the Staffing procedure are recommended for consideration.</p> <p>A. Current procedure: Members of current employees' immediate family may be hired provided they are not to be directly supervised by a relative or a person in a familial relationship on a routine basis. Persons in a familial relationship include roommate, significant other/partner, or dating relationship. Suggested Revision: Relatives of employees may be employed by MS Group as long as one relative does not work under the direct line of supervision of any family member or have budgetary control over each other and/or one relative would not have access to privileged or Group-private information.</p> <p>B. Current procedure: Level 1 Management positions are posted at the company's discretion. Suggested Revision: Executive and Senior Manager positions are posted at the company's discretion.</p> <p>C. Current procedure: A Personnel Requisition must be approved and posted prior to interviews being scheduled. Exceptions must be approved by the Human Resources (HR) Manager. Suggested Revision: Remove the exception. All requisitions should be posted.</p> <p>D. Current procedure: A Personnel Requisition will be posted for a minimum of seven (7) days. Suggested Revision: A Personnel Requisition is typically posted for a minimum of seven (7) days, but is required to be posted for a minimum of three (3) days.</p> <p>E. Current procedure: Once the Personnel Requisition has received full approval, post the position on the WRPS Job Opportunities web page. Suggested Revision: add... "and are automatically sent to various internet job boards and community-based organizations." This would help demonstrate compliance with AAP.</p>

3/28/2018	WRPS- PER- 2018- 0796	Hiring Process Training for Managers	<p>During the performance of assessment FY2018-WR-MD-0375 – Office of Federal Contract Compliance Program (OFCCP) Compliance Review, the following was identified:</p> <p>Observation 18. Evaluate the need for additional guidance and training for managers on the hiring process, specifically behavior based interviewing, affirmative action program compliance, underutilization of job groups, preference in hiring, etc.</p>
3/28/2018	WRPS- PER- 2018- 0796	Evaluate Female Pay Differences	<p>During the performance of assessment FY2018-WR-MD-0375 – Office of Federal Contract Compliance Program (OFCCP) Compliance Review, the following was identified:</p> <p>Observation 19: In future equity reviews, consider looking at female pay differences greater than 4% if funds are available.</p>
3/28/2018	WRPS- PER- 2018- 0799	AAP Training for HR Representati ves	<p>During the performance of assessment FY2018-WR-MD-0375 – Office of Federal Contract Compliance Program (OFCCP) Compliance Review, the following was identified:</p> <p>AAP Training. Suggested that the Workforce Resources (HR) organization provide comprehensive annual AAP plan training for all HR Representatives (Reps). Most HR Reps have a very basic understanding of AAP and very few have seen the actual AAP but most have responsibilities that affect AAP goals and will be in a better position to assist AAP efforts with a greater knowledge base of the AAP</p> <ul style="list-style-type: none"> <li>a. More fully educate Staffing Reps on outreach process and goals so they can incorporate that into their recruiting efforts</li> <li>b. Educate Field Reps so that they can more actively engage and talk to managers about affirmative action for the positions that are being posted.</li> </ul>

3/28/2018	WRPS- PER- 2018- 0801	Performanc e Objective Process	<p>During the performance of assessment FY2018-WR-MD-0375 – Office of Federal Contract Compliance Program (OFCCP) Compliance Review, the following was identified:</p> <p>Performance Objectives. There is a general lack of knowledge on how the performance objective process works and how this relates to the separate process of rating.</p>
3/28/2018	WRPS- PER- 2018- 0802	Hiring Manager Interview Training	<p>During the performance of assessment FY2018-WR-MD-0375 – Office of Federal Contract Compliance Program (OFCCP) Compliance Review, the following was identified:</p> <p>Hiring Manager Training. Hiring managers need more training on the interview process to hire candidates. Depth and quality of the interview process ranges from excellent panel behavior based interviews to managers having a conversation with a candidates or only having technical talks with the candidates. Additional training on good interviewing processes/techniques is needed.</p>
3/28/2018	WRPS- PER- 2018- 0804	Employee Investigation Metric Developmen t	<p>During the performance of assessment FY2018-WR-MD-0375 – Office of Federal Contract Compliance Program (OFCCP) Compliance Review, the following was identified:</p> <p>Metric Development – Human Resources (HR) Investigations and EEO. Consider the development of a metric to track and trend the number and type of employee investigations that occur, so that HR can better understand if there are any EEO trends in employee issues.</p>

3/28/2018	WRPS- PER- 2018- 0805	Workforce Self- Identificatio n	<p>During the performance of assessment FY2018-WR-MD-0375 – Office of Federal Contract Compliance Program (OFCCP) Compliance Review, the following was identified:</p> <p>Workforce Self-identification. Educate the workforce on why it's a good thing to inform the company of their status as a Veteran or an individual with a disability (IWD) and make sure the request to register is done annually. In addition, educate on the criteria for being a Veteran or an IWD.</p>
3/28/2018	WRPS- PER- 2018- 0806	Staffing and AAP	<p>During the performance of assessment FY2018-WR-MD-0375 – Office of Federal Contract Compliance Program (OFCCP) Compliance Review, the following was identified:</p> <p>Staffing and AAP. In the current staffing process, identification of underutilization to managers doesn't begin until the applicant review process by the hiring manger. Managers, Staffing Reps, and Field Reps should be made aware a position is in an underutilized job group as soon as the posting is approved and again when candidates are being reviewed. It should be known earlier in the process so that outreach efforts can be engaged.</p>
3/28/2018	WRPS- PER- 2018- 0808	Staffing and Recruiting	<p>During the performance of assessment FY2018-WR-MD-0375 – Office of Federal Contract Compliance Program (OFCCP) Compliance Review, the following was identified:</p> <p>Staffing/Recruiting. Recruitment of candidates is mostly a passive process based mostly on the posting of positions on job boards. The quality of candidates is average overall. To improve the quality of candidates, consider using recruiters in a more active "sourcing" of qualified candidates. It is recognized that this process also has a negative impacts: need for specialized personnel, training, and work load changes for example.</p>

3/28/2018	WRPS- PER- 2018- 0810	Staffing and Nepotism	<p>During the performance of assessment FY2018-WR-MD-0375 – Office of Federal Contract Compliance Program (OFCCP) Compliance Review, the following was identified:</p> <p>Staffing and Nepotism. The site continues to hire a lot of family and friends. The Staffing process needs to be evaluated to ensure that effective barriers are in place to address nepotism and its possible/perceived issues and to provide assurances that appropriate actions are taken to minimize/eliminate risk (by not allowing hiring, declarations of conflict of interest, etc.).</p>
3/28/2018	WRPS- PER- 2018- 0811	Strategic Diversity Hires	<p>During the performance of assessment FY2018-WR-MD-0375 – Office of Federal Contract Compliance Program (OFCCP) Compliance Review, the following was identified:</p> <p>Staffing and AAP. Workforce Resources should work with management to focus on some strategic diversity hires at the top levels of the organization.</p>
3/28/2018	WRPS- PER- 2018- 0793	Cost Estimating System Inadequacies	<p>Performance Audit of Washington River Protection Solutions, LLC's Estimating System as of February 28, 2017, Performance Audit Report No.: 0221026-2370-16, dated: June 14, 2017</p> <p>Transmittal of Estimating System Audit and Approval of Washington River Protection Solutions LLC'S Estimating System, 18-CPM-0033/1800741, dated March 8, 2018</p> <p>The Estimating System Audit resulted in 7 findings.</p> <p>Finding 0221026-2370-16-1: WRPS does not have adequate controls to consistently evidence that adequate review and approval of cost estimates has occurred.</p> <p>The Estimating System Audit is OJO. Only the transmittal letter is attached.</p>

3/28/2018	WRPS-PER-2018-0795	WRPS does not have adequate controls to evidence specific steps performed	<p>Performance Audit of Washington River Protection Solutions, LLC's Estimating System as of February 28, 2017, Performance Audit Report No.: 0221026-2370-16, dated: June 14, 2017</p> <p>Transmittal of Estimating System Audit and Approval of Washington River Protection Solutions LLC'S Estimating System, 18-CPM-0033/1800741, dated March 8, 2018</p> <p>The Estimating System Audit resulted in 7 findings.</p> <p>Finding 0221026-2370-16-2: WRPS does not have adequate controls to evidence specific steps performed by reviewers prior to approval of estimates.</p> <p>The Estimating System Audit is OOU. Only the transmittal letter is attached.</p>
3/28/2018	WRPS-PER-2018-0797	WRPS did not consistently evidence compliance with required steps in their Estimate	<p>Performance Audit of Washington River Protection Solutions, LLC's Estimating System as of February 28, 2017, Performance Audit Report No.: 0221026-2370-16, dated: June 14, 2017</p> <p>Transmittal of Estimating System Audit and Approval of Washington River Protection Solutions LLC'S Estimating System, 18-CPM-0033/1800741, dated March 8, 2018</p> <p>The Estimating System Audit resulted in 7 findings.</p> <p>Finding 0221026-2370-16-3: WRPS did not consistently evidence compliance with required steps in their Estimate Review and Approval Matrix.</p> <p>The Estimating System Audit is OOU. Only the transmittal letter is attached.</p>
3/28/2018	WRPS-PER-2018-0800	WRPS does not have sufficient policies and procedures to require a root cause analysis	<p>Performance Audit of Washington River Protection Solutions, LLC's Estimating System as of February 28, 2017, Performance Audit Report No.: 0221026-2370-16, dated: June 14, 2017</p> <p>Transmittal of Estimating System Audit and Approval of Washington River Protection Solutions LLC'S Estimating System, 18-CPM-0033/1800741, dated March 8, 2018</p> <p>The Estimating System Audit resulted in 7 findings.</p> <p>Finding 0221026-2370-16-4: WRPS does not have sufficient policies and procedures to require a root cause analysis for variances between proposed and actual costs.</p> <p>The Estimating System Audit is OOU. Only the transmittal letter is attached.</p>

3/28/2018	WRPS-PER-2018-0803	WRPS did not consistently complete or include in proposal packages a price	<p>Performance Audit of Washington River Protection Solutions, LLC's Estimating System as of February 28, 2017, Performance Audit Report No.: 0221026-2370-16, dated: June 14, 2017</p> <p>Transmittal of Estimating System Audit and Approval of Washington River Protection Solutions LLC'S Estimating System, 18-CPM-0033/1800741, dated March 8, 2018</p> <p>The Estimating System Audit resulted in 7 findings.</p> <p>Finding 0221026-2370-16-5: WRPS did not consistently complete or include in proposal packages a price reasonableness analysis when applicable.</p> <p>The Estimating System Audit is OJO. Only the transmittal letter is attached.</p>
3/28/2018	WRPS-PER-2018-0807	WRPS proposals were prepared without a Consolidated Bill of Materials (CBOM).	<p>Performance Audit of Washington River Protection Solutions, LLC's Estimating System as of February 28, 2017, Performance Audit Report No.: 0221026-2370-16, dated: June 14, 2017</p> <p>Transmittal of Estimating System Audit and Approval of Washington River Protection Solutions LLC'S Estimating System, 18-CPM-0033/1800741, dated March 8, 2018</p> <p>The Estimating System Audit resulted in 7 findings.</p> <p>Finding 0221026-2370-16-6: WRPS proposals were prepared without a Consolidated Bill of Materials (CBOM).</p> <p>The Estimating System Audit is OJO. Only the transmittal letter is attached.</p>
3/28/2018	WRPS-PER-2018-0809	WRPS does not have policies and procedures to ensure unallowable or directly associated unallowable costs	<p>Performance Audit of Washington River Protection Solutions, LLC's Estimating System as of February 28, 2017, Performance Audit Report No.: 0221026-2370-16, dated: June 14, 2017</p> <p>Transmittal of Estimating System Audit and Approval of Washington River Protection Solutions LLC'S Estimating System, 18-CPM-0033/1800741, dated March 8, 2018</p> <p>The Estimating System Audit resulted in 7 findings.</p> <p>Finding 0221026-2370-16-7: WRPS does not have policies and procedures to ensure unallowable or directly associated unallowable costs are removed from budget and forecast data.</p> <p>The Estimating System Audit is OJO. Only the transmittal letter is attached.</p>

3/28/2018	WRPS- PER- 2018- 0812	ETF has failed to insure appropriate personnel are scheduled for planning meetings	<p>On 2 occasions in the past 7 days, ETF has failed to insure appropriate personnel are scheduled for planning meetings:</p> <p>Facility failed to invite Rad Planner to TPM for radiological work on Work Package #292799 Camera Inspection of Flash Tank on 3/21/2018.</p> <p>Facility failed to invite Rad Planner to TPM for radiological work on package 381738 Replace ETF Distillate Flash Tank Level Transmitter LT-601-108 on 3/27/2018.</p>
3/28/2018	WRPS- PER- 2018- 0818	Conduit installed for the DST Flow project at three tank farms did not exactly match the design ECN documents	<p>Conduit installed for the DST Flow project at three tank farms was not installed in accordance with ECN documents: ECN-711660-01 (SY FARM), ECN-711662-03 (AN FARM) and ECN-711664-02 (AP FARM). This electrical wiring installation was outside the approved work instruction.</p> <p>The design shows two conduits routed from inside the facility through two exterior wall penetrations and up into the manual transfer switch (MTS). Instead, the installer joined the two raceways inside the facility with a Tee-body conduit fitting so there would be just one wall penetration and just one conduit up into the MTS. The as-built field condition does not align with the Wire Run List and therefore an additional conduit tag is required.</p> <p>The installation method is in compliance with NEC. Engineering documents need to align with as-built conditions. Conduit routing drawings need a minor change with one (1) new conduit tag assignment for the short length of raceway that penetrates wall to MTS.</p>
3/28/2018	WRPS- PER- 2018- 0820	During restoration of Portable 06 Exhauster in T-farm it was identified that there was a seal pot low level alarm	<p>During restoration of Portable 06 Exhauster in T-farm it was identified that there was a seal pot low level alarm locked in preventing start-up. After removal of insulation and addition of water, leak was confirmed at the same location as was documented in the past. (WR-294983 &amp; WR-375145).</p>

3/28/2018	WRPS-PER-2018-0822	While Performing Backfill and Compaction of the subgrade for the A-Farm Exhauster retaining wall footings	While Performing Backfill and Compaction of the subgrade for the A-Farm Exhauster retaining wall footings it was discovered that the subcontractor's QC Soil Technician qualification submittals had not been approved prior to performing the work.
3/28/2018	WRPS-PER-2018-0823	Three RMA's (WRPS-RMA-176, 177, and 178) contain a total of 11 metal Knaack or Job boxes	Three RMA's (WRPS-RMA-176, 177, and 178) contain a total of 11 metal Knaack or Job boxes that were removed from the farms on August 15th, 2017. These metal boxes are marked as "Potential Beryllium". There appears to be no current plans or a path forward with these boxes. The original Work Order appears to have been closed. These RMA's are located outside of SX, T, and U Farms.
3/28/2018	WRPS-PER-2018-0714	222-5 EAPC Walkdown discovery of Pigtail in Corridor BB-C	Room BB-C in the 222-5 building has a non-compliant pigtail (plug and receptacle ends are 15 amp and 20 amp with 14-gauge wire – not connected to anything)

3/28/2018	WRPS- PER- 2018- 0821	During the review of Work Package # 364102	<p>During Quality Assurance Surveillance (QSR #TF-18-QSR-047) for RVC #242APCSS-RVC-038, the following finding was noted (This finding/PER will be considered a POST start item in the RVC as it affects the WRPS work control program and not readiness):</p> <p>Finding 1: During the review of Work Package # 364102, it was identified that the package was not reviewed and approved by QA as required per TFC-OPS-MAINT-C-01. This package contains work related to testing and inspections. WORA approvals did not identify a QA SME for review and approval as required by TFC-OPS-MAINT-C-01. As a result, the work step required the leak test was not adequate for the testing that was performed. However, testing and test report was performed satisfactorily. Due to this finding, QA requested a work record entry into the package to appropriately identify the testing performed and to provide traceability to the supporting documentation.</p>
3/28/2018	WRPS- PER- 2018- 0737	Individual CSERs and CSDs describe the facilities to which they apply but no single location	<p>FY2018-ENG-R-0172 - Observation 2018-1: Individual CSERs and CSDs describe the facilities to which they apply, but there is no single location that describes the criticality safety documentation (or basis for exemption) for all Hazard Category 2 and 3 facilities for which WRPS is responsible.</p>
3/28/2018	WRPS- PER- 2018- 0738	Several minor areas for improvement were found in the criticality safety program document	<p>FY2018-ENG-R-0172 - Observation 2018-2: TFC-PLN-49 improvements</p> <p>Several minor areas for improvement were found in the criticality safety program document. In particular, it is recommended that TFC-PLN-49 include a discussion of the ESRB and its oversight role of the criticality safety program.</p>

3/28/2018	WRPS-PER-2018-0739	Some improvements can be made to documents discussing the CSE qualification process	<p>FY2018-ENG-R-0172 - Observation 2018-3: CSE qualification documentation.</p> <p>Some improvements can be made to documents discussing the CSE qualification process and the requirement sources. The R2A2 for CSEs should be updated to remove the reference to qualification to a DOE standard (DOE-STD-1135), which has been replaced by ANSI/ANS-8.26. In addition, though the two contain identical requirements, the citation of ANSI/ANS-8.26 is inconsistent between referencing it as 8.26-2007 (in the qualification cards) and by the re-affirmation years as 8.26-R2012 and -R2016 (in TFC-PLN-49).</p>
3/28/2018	WRPS-PER-2018-0740	Several minor improvements could be made to the list of assessment LOIs provided in TFC-ENG-CHEM-P-02.	<p>FY2018-ENG-R-0172 - Observation 2018-4: Improvements to TFC-ENG-CHEM-P-02.</p> <p>Several minor improvements could be made to the list of assessment LOIs provided in TFC-ENG-CHEM-P-02, Criticality Safety Assessments. These include a re-evaluation of the frequency of CSER reviews required "periodically" by ANSI/ANS-8.19-2014, and rewording of some LOIs to better account for the question structure as it appears in DOE-STD-1158-2010.</p>
3/28/2018	WRPS-PER-2018-0825	See picture of Surface Pro 3 WRPS property # WF30661	<p>See picture of Surface Pro 3 WRPS property # WF30661 attached [Surface Pro #WF30661 Damage] - appears battery could have melted part of computer. Not all details are known yet.</p> <p>An LDDR is in process to WRPS Property Management and a PER was written to document the failure [see attached copy of e-mail to MSA w/ WRPS Property Management on cc [FW: Surface Pro # picture]].</p> <p>I checked for Microsoft 'Recalls' on the internet &amp; the CPSC website, however did not see any except for the cords we replaced a few years back.</p> <p>MSA indicated (via telecon) this particular issue w/ Pro 3s has not been reported for any others on site, however search on the internet provides many links regarding Surface 3 battery bulge - MSA indicated they will contact Microsoft regarding.</p> <p>Appears to be an isolated incident.</p>

3/28/2018	WRPS- PER- 2018- 0824	On 2/1/2018 a power cord supplying the AW bottle cart failed resulting in an uncontrolled hazardous energy source	On 2/1/2018 a power cord supplying the AW bottle cart failed resulting in a Group 2 Subgroup D 2 (L) occurrence. During the completion of the associated causal analysis it was identified there was no evidence indicating the electrical SMEs (safety or engineering) were notified when the event occurred or when the electricians were called to examine the failure or copied on the PER as part of the screening process. There was a missed opportunity to involve safety and engineering Subject Matter Experts (SMEs) to assist in the review of the event and the plug failure.
3/28/2018	WRPS- PER- 2018- 0826	voluntary battery recall subject	<p>In talking w/ the MSA Information Mgmt. Business Office about another computer issue (WRPS-PER-2018-0825), the following voluntary battery recall subject came up - see attached 'URGENT Voluntary Battery Recall March 10 2017 Revised May....', I requested MSA notify the custodians immediately of the ToughPads involved - see copies of the subsequent e-mail(s) attached as 'FW Panasonic ToughPad Voluntary Recall of Battery Packs'.  Not known when MSA received the notification from the manufacturer but noted they had received the replacement batteries.  The following ToughPads Tablet FZG1 are affected by a Panasonic voluntary recall - <a href="http://pc-dl.panasonic.co.jp/itn/info/announce_16may17.html">http://pc-dl.panasonic.co.jp/itn/info/announce_16may17.html</a> (see also WRPS Property Listing bottom of e-mail attachment, 'FW Panasonic ToughPad Voluntary Recall of Battery Packs').</p> <p>WF33649 (b)(6) )  WF33650 (b)(6) ) - NOTE: e-mail just received regarding WF 33650 (b)(6) ) - has been taken out of service at this time and will remain so until the battery is replaced - currently is w/ (b)(6) )</p> <p>WF33652 (b)(6) )  WF33651 and WF33653 (b)(6) )  WF30259 (b)(6) )</p> <p>EXCERPT from Recall: Battery packs [# FZ-VZSU84K/ FZ-VZSU84R/ FZ-VZSU84U/ FZ-VZSU89U/ FZ-VZSU96U/ FZ-VZSU97U] for Panasonic Toughpad Tablet FZG1.</p> <p>DETAILS: The battery pack of the tablet could overheat and ignite, causing a fire hazard. The root cause of this issue is contamination inside the battery cells. When batteries covered under this recall notice are used in environments with wide temperature variation, a short circuit can occur inside the cell that can cause overheating and ignition. IF YOU HAVE ONE OF THE FZ-G1 TABLETS IMPACTED BY THIS RECALL, YOU SHOULD IMMEDIATELY TAKE THE FOLLOWING ACTION:  Replacement batteries will be shipped from June 2017. Panasonic will arrange battery collection. Until a replacement battery is delivered, please remove the battery and use Power adaptor. If it is impossible, please use BIOS Utility to minimize the risk of fire incident.</p>
3/28/2018	WRPS- PER- 2018- 0817	On 3/5/18 at 11:30 a box of acid from MR-18-00635 was received	<p>On 3/5/18 at 11:30 a box of acid from MR-18-00635 was received. A label from Avantor is on the box claiming the material is Sulfuric Acid. The packing slip from JD Sales notes that the item is Hydrochloric Acid. Upon opening the box, the material is Sulfuric Acid. The Hydrochloric Acid requested by the MR was received in full prior to 3/5/18.</p> <p>Title: Packing Slip information does not match physical material received</p>

3/28/2018	WRPS-PER-2018-0819	222-5 Shipment was Missing Samples from Vendor	<p>The laboratory received our MRAD-28 shipment and there are some discrepancies between what was received and what is listed on the quote (1-6F3AQB) and on the packaging slip. Here are the following issues.</p> <ol style="list-style-type: none"> <li>1. Received 2 QC samples, catalog number 617 and did not receive a PT sample, catalog number 804. Our quote says that we should have received 1 617 sample and 1 804 sample.</li> <li>2. Received 2 QC samples, catalog number 615 and did not receive a PT sample, catalog number 805. Our quote says that we should have received 1 615 sample and 1 805 sample.</li> <li>3. We received 2 806 samples and 2 616 samples. Our quote says that we should have received 1 806 sample and 1 616 sample.</li> </ol> <p>The notification of the issue, the confirmation of issue from ERA, packaging slip, RSA and GKI and quote have been attached.</p> <p>Title: 222-5 shipment was missing samples from Vendor</p>
3/28/2018	WRPS-PER-2018-0827	The Flush trucks are not standardized through out tank farms	<p>The Flush trucks are not standardized through out tank farms. The trucks are constructed of a Fimco Industries model SK-110-8R skid sprayer that is modified to by replacing some of its plastic components with stainless steel ones and the spray nozzle is removed and the hose is used to flush Enrafs and de-entrainment pads of the farms exhausters. RPP-STE-60477, "Enraf Flush Special Tool Evaluation", was written to evaluate changes made to the Flush truck used by ST Team and ensure it was able to be used to flush Enrafs without damaging them. The flush trucks are developed to allow limited number of craft to perform flushes thus helping ALARA and planning.</p>
3/29/2018	WRPS-PER-2018-0814	ERP-2225-006, 222-5 Laboratory Spill/Release procedure does not currently include a method to perform alternate doffing proce	<p>EP-PE 6.33.10 ICS</p> <p>On February 22nd 2018, Emergency Preparedness conducted a Field Drill that included 222-5 Labs ERO personnel and a simulated waste container accident with contaminated and injured personnel (EM-2225-FD-2018-02-01). During the course of the drill the evaluation team identified the following suggestion:</p> <p>A Flagger was not sent to meet arriving HFD resources. They were unaware of the exact event location and the potential contamination area resulting in responders including the IC and OSC advancing too close to contaminated personnel and the event location.</p>