3/29/2018	WRPS-PER-2018-0815	Contaminated personnel were not appropriately prioritized for transportation to decontamination facilities.	EP-PE 6.20 – ERO Operations On February 22nd 2018, Emergency Preparedness conducted a Field Drill that included 222-S 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: Contaminated personnel were not appropriately prioritized for transportation to decontamination facilities.
3/29/2018	WRPS-PER-2018-0816	Drill/Exercise 222-S MBA custodian	EP-PE 6.10 – ERO Activation On February 22nd 2018, Emergency Preparedness conducted a Field Drill that included 222-S 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: 222-S Labs Take Cover and the Evacuation procedures require the BED to confirm with the MBA Custodian that the MBAs are secured however the assigned MBA Custodian is not listed in the Daily Report. This requires the BED to contact the Environmental organization or direct FERO members to determine who the current MBA custodian is during a time urgent response.
3/29/2018	WRPS-PER-2018-0813	ERP-2225-006, 222-S Laboratory Spill/Release procedure does not currently include a method to perform alternate doffing proce	EP-PE 2.13 - Program Responsibilities On February 22nd 2018, Emergency Preparedness conducted a Field Drill that included 222-S 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: ERP-2225-006, 222-S Laboratory Spill/Release procedure does not currently include a method to perform alternate doffing procedure that provides for the doffing team to not utilize respiratory protection which was determined to be acceptable in this case. . The alternate firefighter doffing instructions are currently part of the Tank Farms radiological response procedure (TF-ERP-005, Radiological Release).

3/29/2018	WRPS-PER-2018-0831	MOP/WSV PI coresight display relative to exhauster	On March 28, 2018, Operations identified a discrepancy in a PI Coresight display relative to the exhaust fan status. The error identified was related to the fact that the data value selected for the display was associated with a different exhauster in a different farm (AP-A vs AN-A) although the label on the display was correct. The discrepancy was limited to the Coresight display, not a deeper issue with the mapping of TFMCS data to the PI System. There are 76 of these displays for Tank Farms, 9 for the Evaporator, 9 for the future Freeze Protection system. Recommend this PER be screened to Process Software Engineering Manager as Track Until Fixed to allow time to review all of the published process book displays.
3/29/2018	WRPS-PER-2018-0832	ETF Connex boxes inspection	On March 29, 2018 an inspection of connex boxes and material storage areas around 2025E Effluent Treatment Facility identified several pieces of equipment that should be disposed, excessed or otherwise dispositioned.
3/29/2018	WRPS-PER-2018-0733	RadCon Assessment RSR and task discriptions	A comparison of Radiological Routine Surveillance Task Description(s) and Radiological Survey Records (RSRs) during an assessment performed on the Radiological Routine Surveillance Program revealed discrepancies between some of the task descriptions and RSRs. These discrepancies need to be analyzed and corrected and/or measures need to be put into place so that they are not replicated in the future. An examples of a discrepancy seen is a lack of direct alpha surreys preformed in WTP-1800194, WTP-1800186, and WTP-1800188, even though a direct alpha survey is called out the guiding task description WTP-W001

3/29/2018	WRPS-PER-2018-0735	discrepancies between some of the task descriptions and RSRs	A comparison of Radiological Routine Surveillance Task Description(s) and Radiological Survey Records (RSRs) during an assessment performed on the Radiological Routine Surveillance Program revealed discrepancies between some of the task descriptions and RSRs. These discrepancies need to be analyzed and corrected and/or measures need to be put into place so that they are not replicated in the future. Examples of discrepancy's seen are: no direct survey of an RBA in BOS-1800210, BOS-1700431, BOS-1701099 even though this is required by BOS-W022, as well as no removable beta gamma smear survey reported on C3-C70 in BOS-1700424.
3/29/2018	WRPS-PER-2018-0749	RadCon Assessment non-routinely surveyed areas	Numerous non-routinely surveyed areas were indefinitely suspended with less than desirable justification. TFC-ESHQ-RP_MON-P-10, required radiological surveillance, states that to indefinitely suspend an area requiring radiological surveillance one must "Ensure that sufficient justification is provided to document the decision to remove an area from radiological surveillance for greater than a one-year period." The mass majority of these indefinite suspended areas were suspended with the justification of "Due to area historically posted as area not routinely surveyed." This is not considered sufficient justification. More over MON-P-10 requires that "Hazardous conditions precluding worker access should be described in detail (e.g., locked facility with no power; slip/trip/fall hazards; biological or asbestos contamination present; high dose rates or contamination levels present with no benefit to be gained from entry; etc.)." This was once again not properly preformed instead the known or suspected hazards of the majority of these planned indefinite suspended areas was "Area not set up for normal ingress/egress and will need investigative survey before entry." This is also not acceptable and more detail is required.
3/29/2018	WRPS-PER-2018-0750	Assessment Radcon WRPS-RMA-001 posting and Map	While reviewing survey's for the routine surveillance assessment , survey BOEV-180110 had an action level exceeded by task TFC-W204 in WRPS-RMA-001. Specially that once that action level was exceeded the RMA in question would be to be posted as a RA/RMA, but this was not indicated in either the description of the item nor that map that accompanied the survey. While the dose rates exceed action levels for the RMA, they do not exceed for RA, but looking at the survey, one cannot tell that this area is an RA. I recommend that this be for trend only purposes

3/29/2018	WRPS-PER-2018-0833	IH Assessment review of TFC-PLN-55	FY2018-ESHQ-MD-0365, SMP Industrial Hygiene Management Assessment. Upon review of TFC-PLN-55 it was discovered that the plan was not updated to reflect the implementation of DOORS.
3/29/2018	WRPS-PER-2018-0834	TFC-ESHQ-AP-C-03 mislabeled to link	The link provided in sections 3.1 and 3.2 of TFC-ESHQ-AP-C-03 Management Observation Program, has been mislabeled . The link is labeled TFC-PLN-10 and it links to TFC-PLN-10. It should be labeled TFC-PLN-150 and go to TFC-PLN-150, Human Performance Improvement Management Plan. The links purpose is to take the manager who is writing a MOP to the Error Precursors table located in section 2.6.1 of TFC-PLN-150. Additionally, there is an obsolete note that appears when you move your cursor over the section in the MOP "Summary of Results or Observations (List error precursors/error likely situations observed, latent weaknesses discovered) field instructions state: 'Provide summary.....The "Reference" links to the left provide a list of error precursors on page 65.....".
3/29/2018	WRPS-PER-2018-0835	JRG review of TFC-ESHQ-RP_MON-P-03	On 3/28 a technical procedure was sent to me for possible JRG review. The procedure (ETF-AOP-85B-013) was being developed for setup and use of decontamination shower when a contamination event occurs. The procedure primarily directs setup activities, staging of personnel to help perform the decon, and notifications that should be made. The actual decontamination portion of the procedure refers to an administrative procedure TFC-ESHQ-RP_MON-P-03, Personnel Decontamination. When I went to this procedure it was expected that there would be some mention of JRG consideration. There was none. As a result, the procedure organization was contacted to see if the administrative procedure development process went through the same type of questions related to JRG that the technical procedure process goes through. The response was that administrative procedures do not go through those same type of questions related to JRG. This appears to be a possible oversight.

3/29/2018	WRPS-PER-2018-0836	MOP/WSV TFC-OPS-OPER-C-49 and TO-430-080 Rev process	During preparation of MOP# WRPS-MOP-2018-1002, the following observations were noted. 1) Procedure TO-430-080 - This procedure is currently on Rev. F-3. As specified in Section 4.3, #3 of TFC-OPS-OPER-C-49, the C-49 checklist is supposed to be updated during major revisions to the procedure. As such, Revision F-0 should have had an updated C-49 prepared. Records in IDMS for Rev. F-3 of TO-430-080 did not contain an updated copy of the C-49 checklist. The last copy that could be located was prepared for Rev. E-0 in 2013. It is noted in WRAP that the procedure was revised from Rev. E-3 to Rev. F-0 as part of the periodic review process and that a C-49 checklist was not necessary since the change was considered minor. The periodic review process should be evaluated to ensure this is consistent with the expectations for use of the C-49 process. 2) C-49 checklist (form A-6006-676) - This form currently contains a spot to record both the procedure number and title. Since some procedures stay on the drive for extended periods of time and are subject to multiple major revisions, it would be beneficial to also have the form require the Rev/Mod of the procedure to be recorded.
3/29/2018	WRPS-PER-2018-0837	AW Truck outside farm with garbage around it.	At the northwest corner of AW farm, where an electrical contractor box truck was located, we observed a flatbed trailer that appeared to be in use for conduit bending and cutting pipe threads. We noticed several spray cans lying around the trailer and an open bucket of unknown/unlabeled liquid that was likely involved in the work process. We could not confirm whether the spray cans were empty (i.e., waste) or in-use, or whether the accumulating liquid was associated with an active process during that shift. This issue is being proposed as an opportunity for better housekeeping and chemical product management, so that a potential dangerous waste non-compliance becomes less likely.
3/29/2018	WRPS-PER-2018-0838	MOP/WSV Site Form not found	The procedure was properly followed for this project since it was within the scope of the normal project management process.This procedure does, however, reference site form A-6006-281, CTE Assessment and Report Form. This form was not found in site forms.

3/29/2018	WRPS-PER-2018-0839	AW ENRAF PI communications	Primary Tank Surface Levels or Annulus Leak Detector ENRAF5 occasionally do not report through Pi Communication when operators are syncing their tour to perform routines. This would then require a TMACS or field reading. In addition, when the reading does not report through PI Communication it flags the reading as "UNSAT", which in accordance with TFC-OPS-OPER-C-60 requires a RATL even though a reading can be obtained.
3/29/2018	WRPS-PER-2018-0840	software configuration management issues	There appears to software configuration management issues. There are multiple recent instances where a software update was deployed without going through the required approvals. In one instance the test server sent out emails to the production email server. The known instances are documented in the following PERs: WRPS-PER-2018-0539 WRPS-PER-2018-0540 WRPS-PER-2018-0167 WRPS-PER-2018-0081 WRPS-PER-2017-2568 WRPS-PER-2017-2567 WRPS-PER-2018-0541 So far, none of the PERs have identified a cause of the common trend.
3/30/2018	WRPS-PER-2018-0841	ETF secured MTT Operations on 1-29-18 due external leak at UV-1B on an end enclosure frame gasket.	During ETF Restart Level II activities we received alarms for UV-1A (Secondary Ground Fault / Power Distribution Breaker)(UV-1A End Enclosure Moisture). ETF secured MTT Operations on 1-29-18 due external leak at UV-1B on an end enclosure frame gasket. During the time of Shutdown to today's restart activities, UV-1A did not require or undergo any Maintenance repairs. Age of the UV/OX system and all associated components is of a concern and today's events further illustrate this issue. These types of failures are affecting the facilities ability to process water from the LERF holding basins and could jeopardize overall operating strategies to support LERF-42 bladder replacement and future 242A Campaigns...in my opinion.

4/2/2018	WRPS-PER-2018-0842	Two of three jumpers don't meet requirement for minimum slope of 1/4" per 10 feet of piping	During the SECD reconciliation prior to Evaporator campaign EC-08, it was noted that although the Functions and Requirements Evaluation Document for PSV-PB2-1 (RPP-RPT-42119), contains a requirement that "The PRV discharge line shall maintain a minimum slope of 1/4" per 10 feet of piping." there is no indication that two of the three removable jumpers immediately downstream if the valve (JA-B-(C to 4-40) and JA-B-(21 to 36)), meet this requirement. NOTE: The third jumper has no horizontal runs.
4/2/2018	WRPS-PER-2018-0707	A lack of categorization to identify course criticality in regards to Training Implementation Matrix	A lack of categorization to identify course criticality in regards to Training Implementation Matrix (TIM) positions has been noted by two recent internal Assessments, FY2017-OPI-M-0150 and FY2018-OPI-MD-0332. This lack has made it difficult to confirm TOC Training's commitment to using a graded approach in the Training Program, as directed by DOE Order 426.2, and has made it difficult to confirm compliance with the TOC-mandated biennial review of course materials (per TFC-BSM-TQ_ADD-C-0).
4/2/2018	WRPS-PER-2018-0843	revision to TFC-ESHQ-RP_RWP-C-01, "Radiological Risk Screening to better define the periodicity for Radiological Risk Screen	In the last 2 months, over 20 documents have appeared in my "to do box" in WRAP program for reviewing procedures. A majority of these documents do not include Radiological Risk Screening forms (A-6003-910) with Section A completed as required by TFC-ESHQ-RP_RWP-C-01, "Radiological Risk Screening" (C-01). According to C-01, the following applies:From Section 1:This procedure applies to all radiological work activities, including design, construction, maintenance, operations, and other activities performed at TOC managed properties.All planned work requires radiological risk screening.Further more, from TFRCM HNF-5183 Glossary:radiological work is defined as: *Work on contaminated or potentially contaminated facilities or systems * Work in Radiological Buffer Areas (for contamination) *Work in Radiation, High Radiation, and Very High Radiation Areas *Work in Contamination, High Contamination, and Airborne Radioactivity Areas *Work in contaminated or potentially contaminated soil (including digging, excavating, or disturbing the soil)*Packaging or unpackaging of radioactive material *Work in any area where there is a high probability of radioactive material being present *Work requiring health physics (HP) hold points. Work within 222-S Laboratory includes work on contaminated or potentially contaminated facilities or systems at a minimum. 222-S Laboratory is at a minimum, potentially contaminated, and therefore work documents directing work at 222-S should be radiologically screened. Revision B-3 of C-01 was issued in May, 2016. The current revision, (B-6) contains the same requirement. Since 2016, the process to obtain a Radiological Risk Screening form for periodic reviews or procedure changes has been cumbersome. The procedure writers have been leaving it to the Radiological reviewers to figure out who the work sponsor or technical authority for the documents are. This is outside the requirements of C-01, Section 4.1. Discussions with the CTA for radiological work and who is also TA for C-01, revealed that a change is being made to C-01 that will clarify the responsibilities, better define the periodicity for Radiological Risk Screen, and expand the definition of work sponsor to provide more avenues for having the Rad Screens provided at procedure reviews.

4/2/2018	WRPS-PER-2018-0844	Unsafe vehicle and pedestrian traffic in large work area(s) known as 'Little Egypt" 200-East.Tank Farm area.	Unsafe vehicle and pedestrian traffic in large work area(s) known as 'Little Egypt" 200-East.Tank Farm area. The large area is duel purpose for American Electric RMAs, crane work, loading and unloading large equipment, storage areas and personal and government vehicle entry and egress support personnel housed at the 4 mobile trailers in the south end of the work areas.
4/2/2018	WRPS-PER-2018-0830	ASME B31.3 requires hydrostatic testing	ASME B31.3 requires hydrostatic testing unless alternate testing is approve by owner (DOE-Jim Sondall). Pneumatic testing of ASME B31.3 components was done without owner approval, in addition an In-service leak test was also planned to be done however these tests we not pre-approved by the owner.
4/2/2018	WRPS-PER-2018-0687	WDOH Inspection Closeout Letter AIR-18-301 (2)	WDOH Inspection Closeout Letter AIR-18-301 documents Audit 1221, which consisted of a document review for air emissions unit 93 (296-A-42) at AY/AZ Tank Farm. The letter makes two recommendations. The first is addressed under PER-2018-0686; the second is addressed here. The second recommendation is that the license for 296-A-42, Emission Unit 93, be updated to better describe the parts of the system that operate continuously and those components that are used as backup or standby components.

4/2/2018	WRPS-PER-2018-0686	WDOH Inspection Closeout Letter AIR-18-301	WDOH Inspection Closeout Letter AIR-18-301 documents Audit 1221, which consisted of a document review for air emissions unit 93 (296-A-42) at AY/AZTank Farm. The letter makes two recommendations. The second is addressed in PER-2018-0687; the first is addressed here. The first recommendation is to change the calibration procedure(s) to compare the output of the stack flow with the sample line flow to validate that the flow in the sample line is isokinetic and is providing a representative sample. The intent of this change to the calibration procedure is to save both the regulator and USDOE time in demonstrating that the emission unit sampling system is obtaining a representative sample.
4/2/2018	WRPS-PER-2018-0845	222-S Radioactive Packages needing Repackaging due to damage	While walking down 222-S Radioactive Material Areas (RMAs) to evaluate the condition of radioactive material packaging, seven packages of radioactive material in RMA WRPS-RMA-149 was discovered with damage to the packaging. Damage consisted of cuts, holes, and wear.
4/2/2018	WRPS-PER-2018-0846	Direct contamination found along the East fence line of AX Farm while performing weekly routine	Direct contamination found along the East fence line of AX Farm while performing weekly routine (COO-W041) A Complex perimeter survey. Levels were 27,500 DPM Beta/Gamma, <20 DPM Alpha (Direct), and <1000 DPM Beta Gamma, <20 DPM Alpha (Transferable)

4/2/2018	WRPS-PER-2018-0847	moisture/liquid deposited on the mica surface of a portable GM	Observed disinfectant moisture/liquid deposited on the mica surface of a portable GM probe following a cleanliness wipe down of the GM instrument probe face. The source of the moisture/liquid deposited on the mica surface was a Lysol® wipe used to disinfect the contact surfaces of the probe including the screen that protects the mica surface. Directions for cleanliness wipe downs are included in RC-SO-2018-001, CLEANLINESS WIPEDOWN OF PORTABLE INSTRUMENTS FOR RESPIRATORY PROTECTION.
4/2/2018	WRPS-PER-2018-0848	241-AW-06A Drain Seal	On 2-13-18 WO#260147 was performed to complete Task 4 (leak test) of the 241-AW-06A Drain Seal Replacement. Two attempts to complete Task 4 (drain seal leak test) were made but both failed. The first attempt we added approximately 25 gallons of water and the LDE 196 remained in alarm for 18 minutes. The second attempt we added approximately 25 gallons of water and the LDE 196 remained in alarm for 37 minutes. Due to time constraints and doubt of effectiveness of the new drain seal, we suspended field work to report and consult with Operations and Engineering. The next day, 2-14-18, we attempted it for the third time with engineering's recommendation of 45-50 gallons. Again, it failed after approximately 36 minutes. In the previous months, at the completion of installation of the newly fabricated drain seal assembly, the Projects Organization, performing the work also had a failed leak test but were able to obtain video footage of this drain seal/drain during their initial attempt to get it to seal and pass the leak check. This video footage might be valuable in determining potential damage to the seal or drain, etc. The attached photos show the condition of this drain seal before and after the performance of the Project Organization's work evolution. It appears that the newly coated drain hole/cup (after photo) might have an excessive amount or buildup of the newly applied ASTM Special Protective Coating. This excessive amount appears to have created a mound and an uneven surface on one side of the hole thus preventing the drain seal from establishing an effective seal to prevent leakage of liquid. The current configuration requires a camera to be installed into the pump pit in order to establish an alternate method of leak detection during waste transfer/disturbing activities Please evaluate and provide guidance of a path forward. The work package used to install and test the drain seal remains in working status limbo.
4/2/2018	WRPS-PER-2018-0849	radiological signs that are in need of replacement in C-Farm	While performing a Walk Your Space MOP. Discovered a couple radiological signs that are In need of replacement at C-farm. RMA sign on north side of WRPS-RMA-025 and RA sign on west side of farm north of MO-822. See photos: C1, C2

4/2/2018	WRPS-PER-2018-0850	PER Issued in Error	H-14-021803 Sheet 1 Revision 15 (Zone D-2) shows 4 valves (V-005D, V-005E, V-005F, and V-005G) associated with backflow preventer BFP-001 between valves V-005A and V-005B. However, H-14-110913 Sheet 2 Revision 0 shows there are only 3 valves (V-005D, V-005E, and V-005F). Additionally, the equipment identification schedule on H-14-110913 Sheet 1 Revision 0 does not include V-005G (AP801-RW-V-005G) nor does the "REF DES" column in the parts list include V-005G for item 16 (the backflow preventer).
4/3/2018	WRPS-PER-2018-0852	AP Farm VTP unplanned shut down during maintenance	While performing the annual preventive maintenance on the primary pressure transmitters in AP farm on tank 107, we lost power while replacing the back cover. This caused a short to that transmitter which in turn took out all pressure reading for all tanks in AP farm. Found out while trying to troubleshoot power distribution that all the pressure monitoring transmitters all go through only 1 fuse. This resulted in the exhauster shutting down with no audible positive tank pressure warning alarm. People where working in the farm and did not know to evacuate the farm as there was no warning.
4/3/2018	WRPS-PER-2018-0853	ETF (b)(6) did not perform or document page 6 of 16 of the Rounds Sheet 1	On 04/03/18 Dayshift during the performance of Rounds ETF-OR-DR-MTT "ETF MTT Operator Rounds" the assigned NCO completed his assigned shift rounds and notified SOM that (b)(6) did not perform or document page 6 of 16 of the Rounds Sheet 1. The required surveillance was not performed or documented on (b)(6) 04/02/18. The Round Sheet was signed by the NCO and reviewed/signed by the on duty SOM.

4/3/2018	WRPS-PER-2018-0854	222-S Rm 4N Demolition not following work steps	While working on WO 169916 "2225 Perform room 4N Desolation" the HP First Line identified to the FWS that work step 5.13.5 "Post 2nd floor 4N Duct area as RBA/CA" had not been completed prior to subsequent steps being worked. It was further identified that step 5.13.5 was out of sequence and needed to be moved to follow step 5.13.12. At the direction of the SSW work, removal of hood pans, was completed to put the work in a safe condition and all work was then halted. The SSW then advised the FWS and Construction Manager that the Work Package should be changed to correct the sequence of work steps prior to resumption of work.
4/3/2018	WRPS-PER-2018-0855	20 fire extinguishers had Expired Hydrostatic Test Dates	WRPS procures the service of annual fire extinguisher inspections from the Missions Support Alliance (MSA) contractor via the Hanford Fire Department (HFD). As part of the annual inspection the HFD verifies that each fire extinguisher's Hydrostatic Test Date has not expired. Recently the HFD performed this annual inspection at the Effluent Treatment Facility (ETF) and found that 20 fire extinguishers had Expired Hydrostatic Test Dates. The HFD attached tags stating, " Hydrostatic Test Dates Expired" to the fire extinguishers and gave verbal instructions to the ETF management that the fire extinguishers could still be used in the event of an emergency (fire) but needed to be replace as soon as possible. Fire extinguisher Hydrostatic Expiration Test Dates should be identified at least 2-3 months prior to expiration so that new fire extinguishers can be purchased for replacement. Fire extinguishers/Safety equipment should NEVER be allowed to remain installed for use with warning/danger tags attached unless there is documented justification by a subject matter expert which has also been reviewed and approved by Management.
4/3/2018	WRPS-PER-2018-0858	TAPs with the highest potential ambient concentration relative to their ASILs for a tank farm	This evaluation establishes the Environmental Sampling Program's method for determining the TAPs with the highest potential ambient concentration relative to their ASILs for a tank farm. Through this method, the TAPs which require annual sampling from 241-AP Primary Ventilation System have been identified. Though sampling methodology is discussed for these TAPs, this write-up is not intended to establish the sampling methods for the selected TAPs. However, it should help further the discussion on available sampling methods. This TAP selection methodology is to be incorporated into the next revision of RPP-ENV-56271 Vol. II, Technical Basis Document for Non-Radioactive Air Emissions.

4/3/2018	WRPS-PER-2018-0859	Lack of variation between sampling locations within the stack and desire to update Technical Basis document	Technical Basis Document, RPP-ENV-56271, Volume II, requires that VOC and Ammonia sampling from tank farm stacks be collected from within the stack via probe at 16.7, 50 and 83.3 percent of the stack diameter based on the requirements of EPA Method 25a. EPA Method 25a requires sampling via probe at 16.7, 50, and 83.3 percent of the equivalent stack diameter or a single opening probe may be used so that a gas sample is collected from the centrally located 10 percent area of the stack cross-section. Ammonia measurements have been collected from these 16.7, 50 and 83.3% locations during 4th Quarter 2017 and 1st Quarter 2018. There has been no significant variation of ammonia concentrations between sampling locations. An update to RPP-ENV-56271 Vol. II to allow sampling from the center of the stack would result in less field time necessary to collect environmental samples without an impact to the quality of results, and would still meet the requirements of EPA Method 25a.
4/3/2018	WRPS-PER-2018-0860	Improving Flow of Documentation and Feedback in the Odor Response Process	A Lean Management Value Stream Analysis was held to address an effort for "Improving Flow of Documentation and Feedback in the Odor Response Process." The event was facilitated by Lean Program Office and included representatives from Production Operations, ESH&Q, CPPO, Interface Management, Information Resource Management, and HAMTC. The event resulted in recommendations (see attached). This PER is being initiated to track the final actions needed to meet the outcome of the event.
4/3/2018	WRPS-PER-2018-0861	AY/AZ Tank Farm Ventilation Tank Primary System and Associated Cooling Water, is not a correct fan curve	Fan curve for exhaust fans AZ-K1-5-1A and AZ-K1-5-1B provided in the RPP-15127, System Design Description for AY/AZ Tank Farm Ventilation Tank Primary System and Associated Cooling Water, is not a correct fan curve. This discovery was made during a review of the AY/AZ Tank Farm Flow Calculation RPP-CALC-51256. The concern is associated with use of incorrect fan curves (based on various speeds) to establish feasibility and evaluation of the proposed modification described in the calculation.

4/4/2018	WRPS-PER-2018-0857	TF-RC-10 Portable Alpha Meter Operation and Source Checks	Procedure TF-RC-10 Portable Alpha Meter Operation and Source Checks should be evaluated to see if it should labeled as a Reference procedure rather than a Routine procedure based partially on the observations found in this MOP. In section 5.1 is the only section that states; NOTE - Steps within this section may be performed in any logical order. MOP observations; The procedure was evaluated on a table using instrumentation, sources and associated paperwork. This procedure should be evaluated to see if it should labeled as a Reference procedure rather than a Routine procedure. Accept as noted below the evaluation went well for TF-RC-10. On page 3 of 15 section 4.2 1st bullet; list Instrument service tag BT-6002-880. There are actually 2 tags being used in the field BT-6002-880 and BT-6007-237. suggest that both tags be listed under performance documents to have the option. On page 5 of 15 section 5.1.6 states; ALLOW a 10 second warm-up. this step had to be prompted in both cases. On page 7 of 15 section 5.2 Initial source check states: Minimum acceptable efficiency for 50 cm2 probe is 16% and for 100 cm2 is 15%. When the HPTs were asked what was the minimum acceptable efficiency they could not answer. On page 8 of 15 section 5.2.5**P**ERFORM a saturation check as follows: 1. 7 out of 8 HPTs did not understand the purpose of this test, they merely performed it. 2. It was very difficult to perform this test holding the source in their hand and within 1/4" of the probe without potentially touching the source on the probe. It was found later that another RadCon team was using the outer ring from an air sample head as a jig to place the source into to perform this test and it worked very well (see attached image). This newly found information was passed on to the ETF HPTs as well as other teams that might benefit from the jig. On page 8 of 15 section 5.2.7 states; ALLOW instrument's reading to stabilize (approximately 10 seconds). When the HPTs were asked what was the approximate stabilization time they weren't sure. On page 9 of 15 section 5.2.8.2, a states; a.**I**F reading is high out-of-range, CONTACT the Instrument FPOC for evaluation for continued use. When the HPTs were asked who to contact when the instrument fell out on the high end of the source check one of the two couldn't answer. On page 10 of 15 section 5.2.16, Daily Source Check states;**P**ERFORM a single minute background count AND CONFIRM background is <=3 cpm. During this portion the one minute background count had to be prompted in both cases.
4/4/2018	WRPS-PER-2018-0863	waste service provider at LERF/ETF	A review of training records for the waste service provider at LERF/ETF indicates the the person assigned to this role needs to be scheduled for two courses required by the LERF/ETF Dangerous Waste Training plan. This training is required to be completed within 6 months of assuming the role. This individual has not yet been scheduled for this training.
4/4/2018	WRPS-PER-2018-0864	PER numbers were not included the assessment report	Some assessment reports have been turned in that included opportunities for improvements (observations) and PER numbers were not included the assessment report.

4/4/2018	WRPS-PER-2018-0865	No electronic notification and signature of RadCon procedure changes.	**No electronic notification and signature of RadCon procedure changes.** Opportunity for improvement for RadCon procedure changes would be to implement electronic required reading for RadCon procedure changes.
4/4/2018	WRPS-PER-2018-0867	Pen and Ink change to work order was not processed correctly	**TITLE of PER: Pen and Ink change to work order was not processed correctly** **During Post Review of work order 384505 it was identified that a Pen and Ink change was made to the EIN number of the work document and the data sheet without the proper level of documentation and approval as directed by procedure.** In review of the work record entry entered by (b)(6) , upon arrival in the farm, the craft noted that the identified HPU was not connected to the hoses that were listed on the data sheet. POR352 was identified on the data sheet and the work package. The HPU that was connected was POR353. The craft completed their inspection then notified (b)(6) of the discrepancy. (b)(6) then contacted the AN Team Maintenance manager and was directed to Pen and Ink the information in the work package and on the data sheet to show that POR353 was the equipment worked on. (b)(6) documented all this in the work record, but no authorized approvals per procedure were obtained. The Pen and Ink change was completed after the work was performed. Attachments shows the Pen and Ink change and the work record entry
4/4/2018	WRPS-PER-2018-0866	DCRT Passive Ventilation Maximum Level Calculation	A revision to "Lower Flammability Limit Calculations for Catch Tanks, DST Annuli, Waste Transfer-Associated Structures, and Double-Contained Receiver Tanks in Tank Farms at the Hanford Site," RPP-8050 (Rev 16) was initiated in response to WRPS-PER-2017-2902.1. During review of the document, it was discovered that the changes to DCRT volume and fill fraction caused the calculated waste levels at which 25% of LFL in the tank headspace is reached to decrease for 244-BX and 244-TX and increase for 244-S. These changes in turn cause the DCRT waste level limits presented in TSR LCO 3.6.A cited as the maximum waste levels for passive ventilation, to decrease for 244-BX and 244-TX and increase for 244-S. Based on the proposed revision to RPP-8050 and supporting calculation document RPP-CALC-42251, the maximum level required for passive ventilation in 244-TX decreases from 43 inches to 39 inches, which is below the current level (41 inches) in 244-TX.

4/4/2018	WRPS-PER-2018-0868	AX-Control Trailer installation performed without IH support	It was reported that the AX-Control Trailer installation, POR471-WT-TRLR-001 and POR498-WT-TRLR-002 at Buffalo Ave, was being performed without the required industrial hygiene support as stipulated in the JHA and in IHSP-RETR-NF-11 as cited in the JHA.
4/4/2018	WRPS-PER-2018-0862	AZ-102 Sample procedure adherence at 222-S	Contrary to the requirements of RWP S-809 (rev 010), WHL performed work on AZ-102 samples which were marked with "blue alpha" labels without requisite documentation stipulating coverage requirements.
4/4/2018	WRPS-PER-2018-0869	Microsoft Surface Pro 3 battery failure / bulge	Subsequent information received from Mission Support Alliance 04/04/2018 - related to WRPS-PER-2018-0825 Microsoft Surface Pro 3 battery failure / bulge which was thought to be isolated incident - however, MSA discovered a second instance (1st. case) of Surface Pro 3 which experienced same issue (bulging / separation of screen from case) at 2440 Stevens (DOE-ORP). See attached e-mail 'e-mail from MSA -- RE Surface Pro 3 picture.msg'. Microsoft has seen a small number of issues where the battery in a Surface Pro 3 Tablet Computer is bulging and the screen is separating. No recall has been issued. MSA's Information Mgmt. Business Office Subject Matter Expert of SP3 tablets indicates the Hanford Site has 228 (12 CHPRC, 81 WRPS and 135 MSA – includes HPMC, DOE-RL and DOE-ORP). MSA is determining a path forward. The Microsoft Surface Pro 3 Tablet is a non-standard device and no longer covered by the manufacturer's [one year] warranty. With the timing of the Windows 10 upgrade, these devices may have already had their firmware updated - MSA is checking this. Out of date firmware is the #1 reason customers see challenges with Surface Pro tablets. Surface firmware updates come from Windows Update; will ensure the best possible experience, including better battery life and connectivity.

4/5/2018	WRPS-PER-2018-0870	TOC Training Implementation Matrix Does Not Implement DOE O 426.2 Requirements for Continuing Training	TITLE of PER: TOC Training Implementation Matrix Does Not Implement DOE O 426.2 Requirements for Continuing Training Oversight Title: U.S. Department of Energy, Office of River Protection, DOE O 426.2, Industrial Hygiene Training Program and Operations Training Surveillance Dates of the Oversight: December 18, 2017, through March 7, 2018 Scope: The U.S. Department of Energy, Office of River Protection conducted a surveillance of the Washington River Protection Solutions, LLC (WRPS) Industrial Hygiene Training Program. The purpose of this surveillance was to evaluate and verify that the Training Implementation Matrix used to administer the contractor's training program meets the requirements of DOE O 426.2. The surveillance used the methodology described in DOE-STD-1070-94, Criteria for Evaluation of Nuclear Facility Training Programs, and addressed the entire scope of the Standard. In addition to the assessment of the Industrial Hygiene Training Program, a surveillance was conducted to perform a review of the WRPS Operations training program. Requirements Reviewed: DOE O 426.2, Admin Change 1, Personnel Selection, Training, Qualification, and Certification Requirements for DOE Nuclear Facilities DOE O 426.1A, Federal Technical Capability Program DOE-0355, Rev 0, Hanford Standardized Hazardous Waste Operation and Emergency Response Training ---------- •18012-TF-F0I-TOC Training Implementation Matrix Does Not Implement DOE O 426.2 Requirements for Continuing Training. (Priority Level 3, Scrabeck) Requirements Not Met: DOE O 426.2, Attachment 1 7. Continuing Training Continuing training programs must be established to maintain and enhance the knowledge and skills of operating contractor personnel who perform functions associated with engineered safety features as identified in the facility Documented Safety Analysis (includes operations, maintenance, and technical support personnel). The guidance in DOE-HDBK-1118-99, Guide to Good Practices for Continuing Training, should be used to develop continuing training programs.
4/5/2018	WRPS-PER-2018-0871	WRPS Does Not Fully Implement the DOE O 426.2 Requirements for Continuing Training Content	TITLE of PER: WRPS Does Not Fully Implement the DOE O 426.2 Requirements for Continuing Training Content Oversight Title: U.S. Department of Energy, Office of River Protection, DOE O 426.2, Industrial Hygiene Training Program and Operations Training Surveillance Dates of the Oversight: December 18, 2017, through March 7, 2018 Scope: The U.S. Department of Energy, Office of River Protection conducted a surveillance of the Washington River Protection Solutions, LLC (WRPS) Industrial Hygiene Training Program. The purpose of this surveillance was to evaluate and verify that the Training Implementation Matrix used to administer the contractor's training program meets the requirements of DOE O 426.2. The surveillance used the methodology described in DOE-STD-1070-94, Criteria for Evaluation of Nuclear Facility Training Programs, and addressed the entire scope of the Standard. In addition to the assessment of the Industrial Hygiene Training Program, a surveillance was conducted to perform a review of the WRPS Operations training program. Requirements Reviewed: DOE O 426.2, Admin Change 1, Personnel Selection, Training, Qualification, and Certification Requirements for DOE Nuclear Facilities DOE O 426.1A, Federal Technical Capability Program DOE-0355, Rev 0, Hanford Standardized Hazardous Waste Operation and Emergency Response Training ---------- 18012-TF-F02-WRPS Does Not Fully Implement the DOE O 426.2 Requirements for Continuing Training Content. (Priority Level 3, Scrabeck) Requirements Not Met: DOE O 426.2, Attachment 1 7. Continuing Training a.(2) Continuing training must include, at a minimum, training in significant facility system and component changes, applicable procedure changes, applicable industry operating experience, selected fundamentals with emphasis on seldom used knowledge and skills necessary to assure safety, and other training as needed to correct identified performance problems.
4/5/2018	WRPS-PER-2018-0872	WRPS Does Not Implement the DOE O 426.2 Requirements for Examinations	TITLE of PER: WRPS Does Not Implement the DOE O 426.2 Requirements for Examinations Oversight Title: U.S. Department of Energy, Office of River Protection, DOE O 426.2, Industrial Hygiene Training Program and Operations Training Surveillance Dates of the Oversight: December 18, 2017, through March 7, 2018 Scope: The U.S. Department of Energy, Office of River Protection conducted a surveillance of the Washington River Protection Solutions, LLC (WRPS) Industrial Hygiene Training Program. The purpose of this surveillance was to evaluate and verify that the Training Implementation Matrix used to administer the contractor's training program meets the requirements of DOE O 426.2. The surveillance used the methodology described in DOE-STD-1070-94, Criteria for Evaluation of Nuclear Facility Training Programs, and addressed the entire scope of the Standard. In addition to the assessment of the Industrial Hygiene Training Program, a surveillance was conducted to perform a review of the WRPS Operations training program. Requirements Reviewed: DOE O 426.2, Admin Change 1, Personnel Selection, Training, Qualification, and Certification Requirements for DOE Nuclear Facilities DOE O 426.1A, Federal Technical Capability Program DOE-0355, Rev 0, Hanford Standardized Hazardous Waste Operation and Emergency Response Training ---------- 18012-TF-F03 - WRPS Does Not Implement the DOE O 426.2 Requirements for Examinations. (Priority Level 3, Scrabeck) Requirements Not Met: DOE O 426.2, Attachment 1 7.Continuing Training a.(3) Periodic examinations (written, oral, operational evaluations, performance demonstrations, as applicable to the position) must be administered and documented throughout the cycle on material included in the program. 8.(a) Requalification Examinations. Requalification must include requisite examinations. This may be achieved by either administering a comprehensive biennial requalification examination, including any operational evaluations or performance demonstrations that may be specified, or by: administering periodic examinations (e.g., quarterly) during the requalification cycle.

4/5/2018	WRPS-PER-2018-0873	Noncompliance With DOE O 426.2 Requirements Was Improperly Categorized During WRPS Self-Assessment	TITLE of PER: Noncompliance With DOE O 426.2 Requirements Was Improperly Categorized During WRPS Self-Assessment Oversight Title: U.S. Department of Energy, Office of River Protection, DOE O 426.2, Industrial Hygiene Training Program and Operations Training Surveillance Dates of the Oversight: December 18, 2017, through March 7, 2018 Scope: The U.S. Department of Energy, Office of River Protection conducted a surveillance of the Washington River Protection Solutions, LLC (WRPS) Industrial Hygiene Training Program. The purpose of this surveillance was to evaluate and verify that the Training Implementation Matrix used to administer the contractor's training program meets the requirements of DOE O 426.2. The surveillance used the methodology described in DOE-STD-1070-94, Criteria for Evaluation of Nuclear Facility Training Programs, and addressed the entire scope of the Standard. In addition to the assessment of the Industrial Hygiene Training Program, a surveillance was conducted to perform a review of the WRPS Operations training program. Requirements Reviewed: DOE O 426.2, Admin Change 1, Personnel Selection, Training, Qualification, and Certification Requirements for DOE Nuclear Facilities DOE O 426.1A, Federal Technical Capability Program DOE-0355, Rev 0, Hanford Standardized Hazardous Waste Operation and Emergency Response Training --- 18012-TF-F04-Noncompliance With DOE O 426.2 Requirements Was Improperly Categorized During WRPS Self-Assessment. (Priority Level 3, Scrabeck) Requirements Not Met: TFC-ESHQ-AP-C-01, Required and Management-Directed Assessments 4.5 Conducting Assessments 9.Ensure issues are addressed in a timely manner by initiating a PER, as needed. Categorize issues as Findings or Observations (see Definitions). 5.0 Definitions Finding: An identified noncompliance with applicable requirements, regulations, ordinances, laws, approved documents (procedures, plans, and policies), permits, or agreements.
4/5/2018	WRPS-PER-2018-0874	Corrective Actions and Closure for WRPS-PER-2017-2392 Were Inadequate (NOTE: This PER is still open with 1 Corrective Action	TITLE of PER: Corrective Actions and Closure for WRPS-PER-2017-2392 Were Inadequate (NOTE: This PER is still open with 1 Corrective Action in process. AO) Oversight Title: U.S. Department of Energy, Office of River Protection, DOE O 426.2, Industrial Hygiene Training Program and Operations Training Surveillance Dates of the Oversight: December 18, 2017, through March 7, 2018 Scope: The U.S. Department of Energy, Office of River Protection conducted a surveillance of the Washington River Protection Solutions, LLC (WRPS) Industrial Hygiene Training Program. The purpose of this surveillance was to evaluate and verify that the Training Implementation Matrix used to administer the contractor's training program meets the requirements of DOE O 426.2. The surveillance used the methodology described in DOE-STD-1070-94, Criteria for Evaluation of Nuclear Facility Training Programs, and addressed the entire scope of the Standard. In addition to the assessment of the Industrial Hygiene Training Program, a surveillance was conducted to perform a review of the WRPS Operations training program. Requirements Reviewed: DOE O 426.2, Admin Change 1, Personnel Selection, Training, Qualification, and Certification Requirements for DOE Nuclear Facilities DOE O 426.1A, Federal Technical Capability Program DOE-0355, Rev 0, Hanford Standardized Hazardous Waste Operation and Emergency Response Training --- 18012-TF-F05-Corrective Actions and Closure for WRPS-PER-2017-2392 Were Inadequate. (Priority Level 3, Scrabeck) © Requirements Not Met: TFC-ESHQ-Q_C-C-01, Problem Evaluation Request ATTACHMENT A - DEVELOPING CORRECTIVE ACTIONS Corrective actions will be developed to correct the issue identified and minimize the probability of the issue reoccurring.
4/5/2018	WRPS-PER-2018-0875	An Opportunity For Improvement Exists In The Tracking Of Training Equivalencies	TITLE of PER: An Opportunity For Improvement Exists In The Tracking Of Training Equivalencies Oversight Title: U.S. Department of Energy, Office of River Protection, DOE O 426.2, Industrial Hygiene Training Program and Operations Training Surveillance Dates of the Oversight: December 18, 2017, through March 7, 2018 Scope: The U.S. Department of Energy, Office of River Protection conducted a surveillance of the Washington River Protection Solutions, LLC (WRPS) Industrial Hygiene Training Program. The purpose of this surveillance was to evaluate and verify that the Training Implementation Matrix used to administer the contractor's training program meets the requirements of DOE 0 426.2. The surveillance used the methodology described in DOE-STD-1070-94, Criteria for Evaluation o/Nuclear Facility Training Programs, and addressed the entire scope of the Standard. In addition to the assessment of the Industrial Hygiene Training Program, a surveillance was conducted to perform a review of the WRPS Operations training program. Requirements Reviewed: DOE O 426.2, Admin Change 1, Personnel Selection, Training, Qualification, and Certification Requirements for DOE Nuclear Facilities DOE O 426.J1, Federal Technical Capability Program DOE-0355, Rev 0, Hanford Standardized Hazardous Waste Operation and Emergency Response Training --- 18012-TF-O01 - An Opportunity For Improvement Exists In The Tracking Of Training Equivalencies (Scrabeck) Discussion: TFC-BSM-TQ_MGT-C-01, Training Equivalencies and Extensions and Education and Experience Equivalencies, governs the process for granting of training equivalencies. Training equivalencies are documented on a case by case basis and documented on site form A-6006-362. Educational equivalencies are recorded on site form A-6006-363. Equivalencies are recorded in the ELM system in place of the associated training requirement. When asked how WRPS maintains any additional records on training equivalencies, WRPS training staff stated that the only way to determine who has an equivalency would be access their training record and look at the particular training course documentation. An opportunity for improvement exists in the tracking of equivalencies across WRPS as a whole. REF: TOD Weekly 3-26-18; B Scrabeck; OFI; 18012 - TF - WRPS Training

4/5/2018	WRPS-PER-2018-0876	Determination of Extent of Condition May Have Identified and Corrected Errors in the Training Implementation Matrix	TITLE of PER: Determination of Extent of Condition May Have Identified and Corrected Errors in the Training Implementation Matrix Oversight Title: U.S. Department of Energy, Office of River Protection, DOE O 426.2, Industrial Hygiene Training Program and Operations Training Surveillance Dates of the Oversight: December 18, 2017, through March 7, 2018 Scope: The U.S. Department of Energy, Office of River Protection conducted a surveillance of the Washington River Protection Solutions, LLC (WRPS) Industrial Hygiene Training Program. The purpose of this surveillance was to evaluate and verify that the Training Implementation Matrix used to administer the contractor's training program meets the requirements of DOE O 426.2. The surveillance used the methodology described in DOE-STD-1070-94, Criteria for Evaluation o/Nuclear Facility Training Programs, and addressed the entire scope of the Standard. In addition to the assessment of the Industrial Hygiene Training Program, a surveillance was conducted to perform a review of the WRPS Operations training program. Requirements Reviewed: DOE O 426.2, Admin Change 1, Personnel Selection, Training, Qualification, and Certification Requirements for DOE Nuclear Facilities DOE O 426.I1, Federal Technical Capability Program DOE-0355, Rev 0, Hanford Standardized Hazardous Waste Operation and Emergency Response Training ---------- 18012-TF-002 - Determination of Extent of Condition May Have Identified and Corrected Errors in the Training Implementation Matrix. (Scrabeck) Discussion: The assessors reviewed findings from pervious ORP assessments and their corrective actions and determined that an opportunity was missed to identify and correct these issues. A-17-AMTF-TANKF ARM-002, Maintenance Program Implementation, contained three Findings documenting TFC-PLN-29, Nuclear Maintenance Management Program, not adequately implanting the requirements of DOE O 420.1 C, or containing insufficient information to adequately describe how the requirements were being met. These findings were entered into the corrective action system as WRPS-PER-2017-0752, 0762, and 0765. TFC-ESHQ-Q_C-C-01, Problem Evaluation Request, does not require that Track Until Fixed (TUF) PERs receive an extent of condition review, however Attachment C - Screening Criteria / Significance Levels, does state that determination of cause and extent of condition should be considered for Level 3 DOE Findings. This was not done for these issues. With three Findings in the same assessment identifying similar issues in different areas, the determination of a need for an extent of condition and cause determination would have been reasonable. Therefore an opportunity to identify similar issues existing in other areas was missed. REF: TOD Weekly 3-26-18; B Scrabeck; OFI; 18012 - TF - WRPS Training
4/5/2018	WRPS-PER-2018-0877	Valves PDT-CA1-3A and PDT-CA1-3B are not shown on drawing H-2-99003 SHT 1 Rev. 24,	Valves PDT-CA1-3A and PDT-CA1-3B are not shown on drawing H-2-99003 SHT 1 Rev. 24, P&ID Filtered Raw Water System
4/5/2018	WRPS-PER-2018-0878	RPE issues seem to be spiking at more than +2 standard deviations above the mean	RPE issues seem to be spiking at more than +2 standard deviations above the mean. Defective equipment was reported 204 times in December 2017 and over 175 times in March 2018. The vast majority of the issues appear to be leaks in equipment. The deficiencies should be verified in the field and, if appropriate, a trend declared.

4/5/2018	WRPS-PER-2018-0879	FY17 RCE Specialty Assessment	In FY17 Waste Services opted to perform monthly RCE MOPS of RCE owners rather than a yearly Assessment as required by 95-PCA-337 which states, "State of Washington Department of Ecology (Ecology). U. S. Environmental Protection Agency (EPA), RL and its contractors will periodically evaluate the implementation of the policy, and by joint concurrence make changes that will make implementation more effective." This was documented in a Waste Services Assessment Plan which read as follows: "The Reusable Contaminated Equipment Lead and a waste nuclear chemical operator will perform at least one MOP to determine compliance with the RCE procedure per month of the following areas/owners: 1. Construction - October (This assessment will not include the NCO) 2. Sampling - November 3. 222-S - December (This assessment will not include the NCO) 4. EV Team - January 5. Team Resources - February 6. AZ Team - March 7. ST Team - April 8. AN Team - May 9. Retrieval Team - June 10. ETF - July 11. Others as directed by concerns These MOPs will be performed on the following topical areas: * RCE Inspections * RCE Packaging * RCE Inventory * Unidentified material These MOPs will be documented in the Assessment Tracking Database.
4/5/2018	WRPS-PER-2018-0880	Electronic Records Capture Tool (ERC) did not function properly	Electronic Records Capture Tool (ERC) did not function properly causing delays in getting analytical data packages into IDMS. Development and training of the ERC tool began in 2017, and user acceptance testing was completed successfully on 3/5/18. The tool was expected to decrease the time it takes to get a project file into IDMS from 6 weeks to 2 weeks. The tool was deployed into production on 3/15/18. Sample Management Office (SMO) attempted to use the tool on 3/27/18 in order to get analytical data packages into IDMS. However, the function of the tool that orders the files did not work and the merge process took hours to complete for one 0.5mB project file. It could not be used for the project files.
4/5/2018	WRPS-PER-2018-0772	WRPS SAS program lead has not conducted a self-assessment on the Basic Requirements sub-topical area	The PERIODIC SAFEGUARDS AND SECURITY SURVEY OF WASHINGTON RIVER PROTECTION SOLUTIONS, LLC, 1800754/18-CPM-0034, March 28, 2018, resulted in two findings and eight recommendations. The report itself is OUO and is not attached. Finding One: 17OCT02-RL-9065-SSPS-PMS.7-001 The WRPS SAS program lead has not conducted a self-assessment on the Basic Requirements sub-topical area as required per DOE directives and the AIA. (Reference: CRD M 470.4-1 chg 1, Attachment 2, Part 1, Section G, 2. a. (6); and TOC-AIA-MSC-00004 Rev 6.)

4/5/2018	WRPS-PER-2018-0774	WRPS SAS self-assessment reports do not contain required content	The PERIODIC SAFEGUARDS AND SECURITY SURVEY OF WASHINGTON RIVER PROTECTION SOLUTIONS, LLC, March 28, 2018,1800754/18-CPM-0034, resulted in two findings and eight recommendations. The report itself is OUO and is not attached. Finding Two: 17OCT02-RL-9065-SSPS-PMS.7-002 The WRPS SAS self-assessment reports do not contain required content based on specific criteria listed in DOE requirements
4/5/2018	WRPS-PER-2018-0776	WRPS should evaluate the need for additional resources to handle SAS, FSO, and related program requirements	The PERIODIC SAFEGUARDS AND SECURITY SURVEY OF WASHINGTON RIVER PROTECTION SOLUTIONS, LLC, March 28, 2018, 1800754/18-CPM-0034, resulted in two findings and eight recommendations. The report itself is OUO and is not attached. Suggestion One WRPS should evaluate the need for additional resources to handle SAS, FSO, and related program requirements. BACKGROUND Recent WRPS parent company acquisitions by a foreign owned organization have increased the FSO's facility clearance responsibilities by approximately 50 percent. The acquisitions required the development of a Security Control Agreement (SCA) to mitigate foreign ownership concerns. In addition, the FSO is required to conduct quarterly meetings, and train affected WRPS personnel, which has reprioritized his security program lead responsibilities. The SES manager is the back-up for the SAS program lead. Unexpected additional FSO duties and/or a long-term absence by the SAS program lead could have a negative impact on the SAS program due to the lack of sufficient back-up personnel.
4/5/2018	WRPS-PER-2018-0778	WRPS should evaluate the need for additional survey training for the WRPS (b)(6)	The PERIODIC SAFEGUARDS AND SECURITY SURVEY OF WASHINGTON RIVER PROTECTION SOLUTIONS, LLC, March 28, 2018, 1800754/18-CPM-0034, resulted in two findings and eight recommendations. The report itself is OUO and is not attached. Suggestion Two WRPS should evaluate the need for additional survey training for the WRPS (b)(6), and promote stronger communication between (b)(6) and WRPS (b)(6) personnel. BACKGROUND The WRPS (b)(6) was not aware that CUI was a self-assessment requirement for the Basic Requirement sub-topical element under the Information Security topical area, which led to a finding in the Surveys and Self-Assessments program section. WRPS Information Security, which includes CUI, is operated through the Chief Information Office consequently removing it from (b)(6) overall responsibility and awareness. As a result, CUI has not been assessed within the last four years. In addition, the WRPS (b)(6) was unaware the CUI program had self-assessment requirements. Additional training for (b)(6) and stronger communication between the (b)(6) may enhance knowledge regarding survey requirements for both groups.

4/5/2018	WRPS-PER-2018-0780	WRPS should update their training plan to reflect current positions.	The PERIODIC SAFEGUARDS AND SECURITY SURVEY OF WASHINGTON RIVER PROTECTION SOLUTIONS, LLC, March 28, 2018, 1800754/18-CPM-0034, resulted in two findings and eight recommendations. The report itself is OUO and is not attached. Suggestion 3 WRPS should update their training plan to reflect current positions. BACKGROUND The SAS Training Plan TFC-PLN-127, REV A-8, dated June 28, 2017, states "The SAS personnel representing the WRPS SAS Program are the Security and Emergency Services (SES) Manager, the SAS Program Lead, and a designated alternate to the SAS Program Lead." The employee designated as the alternate left the company prior to the training plan update, and the change was not documented in the revision. Once this was brought to the WRPS SAS program lead's attention, the training plan was updated.
4/5/2018	WRPS-PER-2018-0782	WRPS should ensure required training courses identified in the WRPS Training Plan, TFC-PLN-127, REV A-8, are completed	The PERIODIC SAFEGUARDS AND SECURITY SURVEY OF WASHINGTON RIVER PROTECTION SOLUTIONS, LLC, March 28, 2018, 1800754/18-CPM-0034, resulted in two findings and eight recommendations. The report itself is OUO and is not attached. SUGGESTION 4 WRPS should ensure required training courses identified in the WRPS Training Plan, TFC-PLN-127, REV A-8, are completed within the mandatory time frequency. The SAS Training plan, TFC-PLN-127, REV A-8, dated June 28, 2017, lists required training courses. The training records that document completed training showed the Official Use Only (OUO) Subject Matter Expert course was not completed for the SAS program lead. In addition, the SES program manager completed the course in 2013, however, the requalification course was not completed in 2015 in accordance with the documented frequency requirement. When the SAS program lead was informed of this discrepancy, he stated he would review the information and make appropriate changes. Subsequently, mandatory courses were added to the Integrated Training Electronic Matrix (ITEM) electronic system for future reminders prior to the due dates.
4/5/2018	WRPS-PER-2018-0784	WRPS SAS program lead should ensure TFC-ESHQ-SAS-P-06 includes all applicable programmatic topical and sub-topical areas	The PERIODIC SAFEGUARDS AND SECURITY SURVEY OF WASHINGTON RIVER PROTECTION SOLUTIONS, LLC, March 28, 2018, 1800754/18-CPM-0034, resulted in two findings and eight recommendations. The report itself is OUO and is not attached. SUGGESTION Five The WRPS SAS program lead should ensure WRPS procedure, TFC-ESHQ-SAS-P-06, Rev A-6, Safeguards and Security Assessments, includes all applicable programmatic topical and sub-topical areas listed on DOE F 470.8, Survey/Inspection Report Form. In addition, the procedures should be followed as written. BACKGROUND WRPS procedure, TFC-ESHQ-SAS-P-06, Rev A-6, Safeguards and Security Assessments, Section 3.1, Safeguards and Security (SAS) Program Lead/Facility Security Officer (FSO), states, WRPS will ensure self-assessments are conducted on all SAS program elements. Fieldwork results showed various topical and sub-topical areas are excluded from this section, even though they should not have been excluded, including Physical Protection, Unclassified Foreign Visits and Assignments, Access Authorizations, and OPSEC. However, review of the self-assessments show the WRPS SAS program lead is conducting fieldwork in these program areas and documenting the results in the self-assessments, even though they are not listed in the procedure. This issue is two-fold: procedures are not correct, however, the SAS Program lead is not following the incorrect procedures. Additional coordination between the WRPS SAS program lead, the MSA Surveys and Self-assessments activity manager, and the RL-SEI facility survey operations manager is recommended to assist the WRPS SAS program lead in better understanding this area and the requirements.

4/5/2018	WRPS-PER-2018-0786	WRPS SAS program lead should consider seeking management engagement for reoccurring physical security deficiencies	The PERIODIC SAFEGUARDS AND SECURITY SURVEY OF WASHINGTON RIVER PROTECTION SOLUTIONS, LLC, March 28, 2018,1800754/18-CPM-0034, resulted in two findings and eight recommendations. The report itself is OUO and is not attached. SUGGESTION Six WRPS SAS program lead should consider seeking management engagement for reoccurring physical security deficiencies identified in WRPS self-assessments that are repeatedly entered into the CAM database and validated closed. BACKGROUND A review of WRPS self-assessments identified the reoccurrence of security issues that are entered into the PERS CAM database and subsequently closed. For example, unlocked CONEX containers are a recurring issue during SAS facility walk downs. Walk downs conducted in WRPS parking lots continually discover unlocked government owned vehicles. A number of the unlocked vehicles contain keys and/or government owned equipment. In addition, buildings are found unlocked during off shift walk downs. The SAS program lead enters the identified findings into PERS, and they are assigned to the applicable management organization. Eventually the findings are closed, yet the problems are not solved. The WRPS program lead is doing a good job identifying the security deficiencies, and entering the findings into the CAM database, however, management involvement should be considered to find a solution that actually prevents the issue from recurring. Although there have been no reported incidents of theft involving government owned equipment or vehicles, the potential risk increases over time.
4/5/2018	WRPS-PER-2018-0788	OUO program manager should include information on the web page that would close gaps between the MSA OUO procedure and the W	The PERIODIC SAFEGUARDS AND SECURITY SURVEY OF WASHINGTON RIVER PROTECTION SOLUTIONS, LLC, March 28, 2018,1800754/18-CPM-0034, resulted in two findings and eight recommendations. The report itself is OUO and is not attached. SUGGESTION Seven The OUO program manager should include information on the web page that would close gaps between the MSA OUO procedure and the WRPS employee work processes. BACKGROUND There are MSA specific requirements in the procedures that may lead to some confusion for WRPS employees. For example, if a MSA employee uses the Freedom of Information Act (FOIA) exemption for law enforcement, the procedure requires a review by an authorized Derivative Classifier (DC). WRPS does not have DCs. The WRPS OUO program manager indicated that applicable reviews are performed by an MSA DC during the document clearance process.
4/5/2018	WRPS-PER-2018-0790	WRPS should have OPSEC posters in place to remind employees of their responsibilities	The PERIODIC SAFEGUARDS AND SECURITY SURVEY OF WASHINGTON RIVER PROTECTION SOLUTIONS, LLC, March 28, 2018,1800754/18-CPM-0034, resulted in two findings and eight recommendations. The report itself is OUO and is not attached. SUGGESTION Eight WRPS should have OPSEC posters in place to remind employees of their responsibilities. BACKGROUND During the walkthrough, only one OPSEC poster was observed in the three buildings. The posters should be located in common areas and places where information is copied, transmitted and received.

4/5/2018	WRPS-PER-2018-0571	Alpha Surveys not Performed When Required	On February 15, 2018 HPT's were covering work at the AY farm on the flow monitoring system. During this time the HPT's had a reading on a smear of 200,000 dpm/100cm2 Beta/Gamma. This reading was read through a glove with a GM, the HPT's did not survey the smear for Alpha, this decision was made by the HPT's, because of the high winds that were approximately 45mph that day. The RWP WTP-0432 states Alpha survey required when beta-gamma is detected.
4/5/2018	WRPS-PER-2018-0881	ETF UV/OX Circuit Verification	On Thursday April 5, 2018 during circuit verification work on the Effluent Treatment Facility (ETF) Ultraviolet Oxidation (UV/OX) skid UV-2 lamp panel schedules were found to be incorrectly labeled. The panel schedule for UV-1 is suspect and circuit verification is ongoing to verify and correct the panel schedule. These breakers are not used as LOTO isolation of the UV lamps. The LOTO isolation is upstream of these breakers.
4/5/2018	WRPS-PER-2018-0882	Required Training Courses Not Complete	A training equivalency form (A-6006-369) for (b)(6) was provided to Tank Farms Training on 1-18-18 for the initial knowledge course (35K880) and OJT/OJE (357880) for (b)(6) . These courses are prerequisites for the Performance Demonstration. It was stated on the form that the Performance Demonstration (PD) (35R880) (intended to be a 2 year requalification) for this equipment had been performed by (b)(6) on 1-13-16 in which the individual was evaluated for the knowledge and operation of the instrument. Attached to the equivalency form was a letter from (b)(6) first line supervisor that stated (b)(6) was proficient in their knowledge and performance of the operation of (b)(6) and that they had taken both the knowledge course and OJT/OJE, but the record documents could not be found. Both of these courses are prerequisites for the PD. Also attached to the equivalency letter was training documentation for the PD for 1-13-16 and another PD for the person completed 3-3-14. Upon review of the attached documentation, it was determined that the PD from 3-13-14 has been recorded by MSA Training Records and the individual was given credit for completion without any record of having performed the required prerequisite knowledge (35K880) and OJT/OJE (357880) courses. In addition, the PD had several tasks and sections that were blank without notations which is unacceptable for any record documentation. In reviewing the PD from 1-13-16, it is complete but was not accepted or recorded by MSA Training Records and in the comments section it was noted that (b)(6) "needs 35780, 35K880" which are the prerequisite knowledge and OJT/OJE course number. Now, in 2018, the individual was attempting to complete a PD but was stopped by rejection from MSA Training Records because there were no records giving him credit for the prerequisite courses, 35K880 and 357880, hence the equivalency request. Therefore, the individual does not have training records to substantiate his required training for the use of (b)(6) since at least 3-3-14.

4/5/2018	WRPS-PER-2018-0883	Application of the Engineering Technical Rigor Improvement Tool to WRPS-PER-2017-2695	Application of the Engineering Technical Rigor Improvement Tool to WRPS-PER-2017-2695 identified the following process improvement for consideration for application to the WRPS Engineering Program: The current condition is judged to be adequate and effective, however the following improvement can lead to a strengthened engineering program. An extent of condition review should be performed to determine where implementation of DSA/TSR requirements have been implemented via documentation that requires review and approval of a single engineer (without review by second qualified engineer or manager). The extent of condition review should consider engineering deliverables generated using procedures owned by other organizations (e.g. Technical Procedures, Administrative Procedures, and Work Packages).
4/5/2018	WRPS-PER-2018-0884	Potential Process Improvement to MARS at 222-S	Application of the Engineering Technical Rigor Improvement Tool to WRPS-PER-2018-0115 identified the following process improvement for consideration for application to the WRPS Engineering Program: The current condition is judged to be adequate and effective, however the following improvement can lead to a strengthened engineering program. Develop an administrative procedure to document the process to maintain the 222-S Material at Risk inventory procedures and capture institutional knowledge on the process.
4/5/2018	WRPS-PER-2018-0885	TFC-ESHQ-ENV_PP-C-17 does not provide instructions for completing the Annual Treatability Study	SUB-001-002 - Subcontractor found that TFC-ESHQ-ENV-STD-17 describes the Annual Treatability Study (Section 3.2.5); however, TFC-ESHQ-ENV_PP-C-17 does not provide instructions for completing the annual submittal. They recommended a new procedure be developed to provide recommended steps/instructions. The Document Owner for TFC-ESHQ-ENV-STD-17 should determine if a new procedure or modification of an existing procedure is most appropriate.

4/5/2018	WRPS-PER-2018-0886	TFC-ESHQ-ENV_PP-C-17 doesnt provide instructions for completing the Annual Non-Compliance Report	SUB-003-003 - Subcontractor found that TFC-ESHQ-ENV-STD-17 describes the Annual Non-Compliance Report (Section 3.2.4); however, TFC-ESHQ-ENV_PP-C-17 does not provide instructions for completing the annual submittal. They recommended a new procedure be developed to provide recommended steps/instructions. The Document Owner for TFC-ESHQ-ENV-STD-17 should determine if a new procedure or modification of an existing procedure is most appropriate.
4/5/2018	WRPS-PER-2018-0887	Process/procedure improvement to include a "table-top" review of the proposed safety basis change prior to implementation	Application of the Engineering Technical Rigor Improvement Tool to WRPS-PER-2018-0056 identified the following process improvement for consideration for application to the WRPS Engineering Program: The current condition is judged to be adequate and effective, however the following improvement can lead to a strengthened engineering program. Consider a process/procedure improvement to include a "table-top" review of the proposed safety basis change prior to implementation. This approach will provide reviewers with a different perspective and for activities such as the pneumatic encasement testing this may be an effective way of identifying flaws in the proposed safety basis change. This process should include input from the Safety Basis Compliance Officer.
4/5/2018	WRPS-PER-2018-0888	Subcontractor found deficiencies in TFC-ESHQ-ENV_PP-C-17	SUB-003-004 - Subcontractor found deficiencies in TFC-ESHQ-ENV_PP-C-17. They recommended specific modifications to the procedure. The Document Owner for TFC-ESHQ-ENV_PP-C-17 should determine which of the recommendations are appropriate for update in the procedure.

4/5/2018	WRPS-PER-2018-0889	TFC-ESHQ-ENV-STD-02 does not provide instructions for completing the Annual PCB Report and Document Log	SUB-004-002 - Subcontractor found that TFC-ESHQ-ENV-STD-02 describes the Annual PCB Report and Document Log; however, procedures do not provide instructions for completing the annual submittal. A new procedure is recommended to provide recommended steps/instructions. The Document Owner for TFC-ESHQ-ENV-STD-02 should develop a new procedure based upon recommended steps provided by the subcontractor.
4/5/2018	WRPS-PER-2018-0890	Consider development of a Engineering Lessons Learned communication bulletin	Application of the Engineering Technical Rigor Improvement Tool to WRPS-PER-2017-2835 identified the following process improvement for consideration for application to the WRPS Engineering Program: The current condition is judged to be adequate and effective, however the following improvement can lead to a strengthened engineering program. Consider development of a Lessons Learned communication bulletin on error traps associated with acceptance of construction acceptance testing results: • Under schedule pressure • With a single engineering reviewer • Absence of technical management direct oversight
4/5/2018	WRPS-PER-2018-0891	Procedures, analyses and documents that may require modification due to the cancellation of the RPP-PLAN-60074	Completed a limited, brief review of procedures, analyses and documents that may require modification due to the cancellation of the RPP-PLAN-60074, Rev. 5, "Tank 241-AY-102 Monitoring Plan". Although only a small amount of information was reviewed, it is clear that a more extensive review of WRPS procedures and other reports, plans, or analyses will be needed by multiple organizations to develop a list and prioritized schedule for modification or cancellation of documents, procedures, etc., associated with RPP-PLAN-60074.

4/5/2018	WRPS-PER-2018-0892	Multiple organizations need modification or cancellation of documents, procedures, etc., associated with RPP-PLAN-60074.	Completed a limited, brief review of procedures, analyses and documents that may require modification due to the cancellation of the RPP-PLAN-60074, Rev. 5, "Tank 241-AY-102 Monitoring Plan". Although only a small amount of information was reviewed, it is clear that a more extensive review of WRPS procedures and other reports, plans, or analyses will be needed by multiple organizations to develop a list and prioritized schedule for modification or cancellation of documents, procedures, etc., associated with RPP-PLAN-60074.
4/5/2018	WRPS-PER-2018-0893	Maintenance needs modification or cancellation of documents, procedures, etc., associated with RPP-PLAN-60074.	Completed a limited, brief review of procedures, analyses and documents that may require modification due to the cancellation of the RPP-PLAN-60074, Rev. 5, "Tank 241-AY-102 Monitoring Plan". Although only a small amount of information was reviewed, it is clear that a more extensive review of WRPS procedures and other reports, plans, or analyses will be needed by multiple organizations to develop a list and prioritized schedule for modification or cancellation of documents, procedures, etc., associated with RPP-PLAN-60074.
4/5/2018	WRPS-PER-2018-0894	Engineering needs modification or cancellation of documents, procedures, etc., associated with RPP-PLAN-60074.	Completed a limited, brief review of procedures, analyses and documents that may require modification due to the cancellation of the RPP-PLAN-60074, Rev. 5, "Tank 241-AY-102 Monitoring Plan". Although only a small amount of information was reviewed, it is clear that a more extensive review of WRPS procedures and other reports, plans, or analyses will be needed by multiple organizations to develop a list and prioritized schedule for modification or cancellation of documents, procedures, etc., associated with RPP-PLAN-60074.

4/5/2018	WRPS-PER-2018-0895	Application of the Engineering Technical Rigor Improvement Tool to WRPS-PER-2018-0295	Application of the Engineering Technical Rigor Improvement Tool to WRPS-PER-2018-0295 identified the following process improvement for consideration for application to the WRPS Engineering Program: The current condition is judged to be adequate and effective, however the following improvement can lead to a strengthened engineering program. Design of below the hook lifting fixtures is not a core area of expertise for WRPS. Consideration should be given to soliciting future design of such fixtures to companies that design, fabricate, and test below the hook lifting fixtures as a core business. Development of a process to set up a basic ordering agreement (BOA) for this service should be considered.
4/5/2018	WRPS-PER-2018-0896	Application of the Engineering Technical Rigor Improvement Tool to WRPS-PER-2018-0295	Application of the Engineering Technical Rigor Improvement Tool to WRPS-PER-2018-0295 identified the following process improvement for consideration for application to the WRPS Engineering Program: The current condition is judged to be adequate and effective, however the following improvement can lead to a strengthened engineering program. Consider consolidation of review and approval requirements in a single procedure rather than distributed through each individual procedure for the multiple processes. Add this recommendation to those being considered in resolution of Recommendation RLW-09-B, Final Report of Management Systems LLC Common Cause Analysis, Technical Rigor Analysis of the Washington River Protection Solutions (WRPS) Engineering Function Processes.
4/5/2018	WRPS-PER-2018-0897	Application of the Engineering Technical Rigor Improvement Tool to WRPS-PER-2018-0359	Application of the Engineering Technical Rigor Improvement Tool to WRPS-PER-2018-0359 identified the following process improvement for consideration for application to the WRPS Engineering Program: The current condition is judged to be adequate and effective, however the following improvement can lead to a strengthened engineering program. Update the Technical Staff Qualification Card (Course 350850) to include TFC-ENG-STD-19.

4/5/2018	WRPS-PER-2018-0898	Potential Update to 219-S Improvement Studay	Application of the Engineering Technical Rigor Improvement Tool to WRPS-PER-2018-0359 identified the following process improvement for consideration for application to the WRPS Engineering Program: The current condition is judged to be adequate and effective, however the following improvement can lead to a strengthened engineering program. The design of the 219-S P-1 was identified as a contributor to this event since the lack of the ability to flush this system following use severely limits the life of the pump. It is recommended that RPP-RPT-46803, 219-S Improvement Study, be updated (or a new report issued) to include this need with an updated supporting cost estimate. The need to upgrade the pumping system needs to be included in the semi-annual Engineering report to 222-S Laboratory Management until the upgrade is completed.
4/6/2018	WRPS-PER-2018-0902	ETF UV Amp shutdown and MTT	Operations returned UV-2 back to service and OPERATION (Running with energized lamps). After operating for approx. 9 minutes, Lamp #16 and an Amperage spike then shutdown. Immediately following Lamp #16 going down, Control Room Operator received a Lamp Enclosure Moisture Alarm, which the trips MTT to SHUTDOWN. After SHUTDOWN, Operations isolated and drained the system. Contacted CSO and Facility Management. Last weekend on 3/30/2018, UV-1A experienced the same trip. This PER is to document repeat issues with the UV System at ETF.
4/6/2018	WRPS-PER-2018-0903	242A Exit lights	242A South East Entrance, Exit light is not illuminated. Maintenance is needed for repair and/or troubleshooting. PER is for trending purposes; please direct to EV team maintenance.

4/8/2018	WRPS-PER-2018-0904	PT60F111 (1st RO pump discharge pressure) below "NORMAL RANGE"	1. PT60F111 (1st RO pump discharge pressure) below "NORMAL RANGE" of 250 - 300 psig, on ETF-OR-DR-CR rounds (pg-6) when RO system is in READY. With RO membranes as clean as they presently are, as indicated by the Conductivity readings throughout the system, the range may need to be broadened or noted as applicable for OPERATION. RATL 18-MT-009 generated. 2. Received PALX60F211 (2nd RO pump discharge pressure) when the field / MCS indication is at 356 psig and ARP states alarm should activate at 350 psig. ARP also states an Automatic action of pumping going to Shutdown and it has not (once again, we are in READY state, not OPERATION). 3. Received LAH65C111 / LAHH65C111 / LAH65C211 on 4% Chemical tanks when RO System was taken to READY condition. Confirmed chemical tanks did not go through and auto make-up. Level historian was reviewed and confirmed alarms correspond with status change of RO. Believe pressure change across VOG system has affected 4% Chemical tank level transmitters. Confirmed NO abnormal change in SUMP-2 level trend; indicating NO overflow condition. Pumps secured pending maintenance t/s or return to previous levels.
4/8/2018	WRPS-PER-2018-0905	ETF Work delay due to certs	On 4/07/2018 and 04/08/2018 OT work was scheduled for ETF. Activity on 04/07/18 was to work on replacing pH Adjust Pump: IH called out on OT could not Ace into ETF. Activity on 04/08/2018 was to Replace Lamps and Tubes on UV-2A system, critical work to restart ETF MTT system. The Electrician called out was unable to Ace in at ETF under LE-121. Contacted Maint. On Call Manager and he responded quickly to get another Electrician and verified they were Aceable under LE-121. Two instances of lack of Qualifications specific to ETF RWP's cost work crew delays approx. 3 1/2 hours each day.,
4/9/2018	WRPS-PER-2018-0907	Chem Worker Tier 3 training was crafted to train IHT's	On April 5th, 2018 I attended Chemical worker tier 3 training at the HTC; having been through CHAT training many times over the past 8 years, I feel as though the new Chemical worker training .. at least the Tier 3 training was crafted to train IHT's. Many comments were made "we as IHT's have this responsibility", topics were in based on IHT's tools and proper use, IHT documents, etc... The course had very little value to the general worker from my perspective. CHAT was a more general overview of the chemical hazards at Tank farms where Chemical worker Tier3 seems to be in intro course for our IHT's.

4/9/2018	WRPS-PER-2018-0901	Continuing Training is inconsistentl y defined and delivered in differing units within WRPS.	A Management assessment on the Tank Operations Contractor (TOC) training program was conducted during October 31, 2017-February 28, 2018. This report discusses the purpose, scope, and results of the assessment. Continuing Training is inconsistently defined and delivered in differing units within WRPS.
4/9/2018	WRPS-PER-2018-0899	Missing validation of training materials - no SME, line managemen t, or training managemen t signatures.	A Management assessment on the Tank Operations Contractor (TOC) training program was conducted during October 31, 2017-February 28, 2018. This report discusses the purpose, scope, and results of the assessment. Missing validation of training materials - no SME, line management, or training management signatures.
4/9/2018	WRPS-PER-2018-0900	Inconsistent use and managemen t of knowledge checks.	A Management assessment on the Tank Operations Contractor (TOC) training program was conducted during October 31, 2017-February 28, 2018. This report discusses the purpose, scope, and results of the assessment. Inconsistent use and management of knowledge checks.

4/9/2018	WRPS-PER-2018-0906	ETF contamination found outside 2025 ED facility	During the performance of a Scheduled Radiation Survey Task Description (LE-D012) at ETF, contaminated tumbleweed fragments were discovered. Total Contamination of; Southside of 2025EA rainspout (Non-Rad Area): Location # 1: 8,000 dpm/100 cm2 Beta-Gamma and <500 dpm/100 cm2 Alpha No removable contamination was detected. The fragments were disposed of.. Survey results are documented in Survey Simple on survey # LE-1800665.
4/9/2018	WRPS-PER-2018-0856	P/E 8.3 Facility and Equipment	P/E 8.3 Facility and Equipment On March 7th, 2018, Emergency Preparedness initiated an ICP Limited drill that included Tank Farm ERO personnel and a simulated deflagration in AP-108 (EM-PO-ICP-2018-03-01). During the course of the drill the evaluation team identified the following issue: The BED Assistant attempted to access the Tank Farm cameras during the response to obtain a better visual on the ENRAF. None of the cameras were operable. The BED Assistant stated that the cameras aren't maintained unless there is an active retrieval. These cameras are a valuable tool for emergency response and allow responders to get "eyes on" the event without having to send personnel into a hazardous situation. (P/E 8.15 – Equipment Response)
4/9/2018	WRPS-PER-2018-0908	No (RPE) Issuance Station Identification Form at Issuing Stations	This was previously address in WRPS-PER-2018-0240, however it appears the previous PER was closed by management prematurely. Failing to ensure that the previously tasks were completed properly. All of the recently filled out forms have some type of error, incomplete fields, incorrect names and/or signatures, missing signatures, poor descriptions, and lack proper conduct of operations practices. In procedure TO-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"

4/9/2018	WRPS-PER-2018-0909	Entered ETF-AOP-85B-011 (Loss of MCS).	The ETF Monitor and Control System (plant process computer) has occasionally in the last couple months quit working with "operator interface" communication, preventing the Control room operator from monitoring plant systems or have the ability to control them. The MCS was still functioning on its own during these times, but the communication data was unavailable to see and changes to plant processes were not under the control of the operator.
4/9/2018	WRPS-PER-2018-0910	Improvement opportunities draft documents for the exposure assessment, industrial hygiene manual, and boundary paper	An opportunity for improvement was noted during a review of draft documents for the exposure assessment, industrial hygiene manual, and boundary paper. It was noted that the criteria and methodology for the evaluation of two or more chemicals present in the same airspace is not clearly referenced in these documents. Although it is expectation that IH professionals would identify and evaluate such scenarios as a matter of professional expertise it is worthwhile to describe the methodology and evaluation techniques in the documents that are most closely aligned with performing exposure assessments.
4/9/2018	WRPS-PER-2018-0911	Seven WRPS documents still reference the Executive Orders 13423 and 13514	Seven WRPS documents still reference the Executive Orders 13423 and 13514 which have been revoked and are no longer in the contract.

4/9/2018	WRPS-PER-2018-0912	DOE-0352 Section 7.0 Training	Tank Farms Contractor WRPS is out of compliance per DOE-0352 Hanford Site Respiratory Protection Program. DOE-0352 Section 7.0 Training "Contractors shall ensure that individuals providing direct supervision of RPE users are trained and qualified annually to the same level as the workers they are supervising. Supervisors shall maintain RPE training on the equipment being used at their site.'
4/9/2018	WRPS-PER-2018-0914	No Training Specialists are present for operators to take tests at the 2752 E Training facility.	No Training Specialists are present for operators to take tests at the 2752 E Training facility. Recently, it has been discovered by several operators that the ability to go to the Training Facility to take an exam is nearly impossible. It is managements expectation that workers take care of their tests during down time. typically, only 20-30 minutes would be necessary to take care of exams/recerts at the training facility in 200E. Now, since most of the Training Department is in town (HTC), there is no one present to give an exam or to answer questions. It has NOT been identified by the Training Department how they will continue to be a support organization when the customer is onsite and they are not. It is not our responsibility to come up with a solution it is the Manager of the Training Department.
4/9/2018	WRPS-PER-2018-0915	While delivering water in a government truck a case of water fell off the back of the truck.	While delivering water in a government truck a case of water fell off the back of the truck. The WRPS teamsters stopped and restacked the water and secured the load.

4/9/2018	WRPS-PER-2018-0916	Employee Job Task Analysis (EJTA) missing certain respiratory hazards	WPRS uses the Employee Job Task Analysis (EJTA) system to identify workers who need medical evaluations for respirator use. However, a location to communicate information such as: the RPE user's duration and frequency of RPE use, expected physical work effort, additional protective clothing equipment worn, and likely temperature and humidity extremes encountered was not found within Hanford's EJTA system. Item 4 of MQE Part 1of of the Hanford EJTA program only allows the manager to say "yes his employee is a respirator wearer" or "no the employee is not." Similar information is collected within the EJTA process. It is not clear if it applies to the RPE user. Section 4.2 of TFC-ESHQ-S_IH-C-05 requires such information be communicated the medical evaluator. However, an avenue to communicate such information was not found within the EJTA system.
4/9/2018	WRPS-PER-2018-0917	AX Farm Waste recovery pump flange	Drawing H-2-63861, P200 Waste Recovery Pump, identifies a flange dimension and configuration different than the field as observed during a recent field activity.
4/9/2018	WRPS-PER-2018-0921	ETF Chairs	The chairs in the control room are run down and less then adequate for the CRO to be in for the long durations required for the position and the rest of the chairs are for crew brief. They are in broke to disrepair status.

4/10/2018	WRPS-PER-2018-0922	ETF Bird Feces	During the performance of a Scheduled Radiation Survey Task Description (LE-D012) at ETF, contaminated bird feces was discovered. Total Contamination of; Surge Berm (Non-Radiological Area): Location # 1: 54,000 dpm/100 cm2 Beta-Gamma and 42 dpm/100 cm2 Alpha, No removable contamination was detected. The location was deconned. Survey results are documented in Survey Simple on survey # LE-800671.
4/10/2018	WRPS-PER-2018-0913	Event Notification System Electrical Drawing	Event Notification System Electrical Drawing calls for the Neutral to be paralleled with the normal power source and the alternate power source. This wiring configuration does not meet National Electrical Code requirements prescribed in Articles 250.24(5), 250.30 (A), 250.34 (C) and 110.3 (B). In addition generators are intended to be connected through permanently installed certified transfer equipment that will switch all conductors with exception of the grounding conductor.
4/10/2018	WRPS-PER-2018-0851	POR-127 Restart	Portable Exhauster POR127 (296-P-50) was secured due to a high differential pressure reading across the pre-filter.

4/10/2018	WRPS-PER-2018-0926	Procedures with steps that span multiple pages	Procedures with steps that span multiple pages are difficult to navigate. Note TFC-OPS-OPER-C-13 sections 4.2 and 4.16 span over five pages each. Navigation within Word doesn't help since the outline level is on the first page of the section.
4/10/2018	WRPS-PER-2018-0927	OmniLIMS Documentation updated to reflect emergency patch to correct RPD difference	WHL reported the fact that the %RPD calculated by OmniLIMS appeared to be changing as they were verifying results on a sample batch.
4/10/2018	WRPS-PER-2018-0925	ETF Pumps with Magnets	Work package # 261711 requires the FWS to have the employees remove their security badges and give them to the FWS to stage them somewhere away from the magnetic pump area. After talking to the work planner about this he said that the manufacturer recommends not working around the pumps with any equipment that could be de-magnetized such as security badges and pacemakers. If there is a potential for a pacemaker to stop and badges to be de-magnetized just by being in close proximity to the pumps then the area should be posted to alert the personnel working in that area of the hazard.

4/10/2018	WRPS-PER-2018-0928	Shutdown Criteria in the 222-S to 241-SY-101 Waste Transfer Procedure Was Vague and Subject to Interpretation	TITLE of PER: Shutdown Criteria in the 222-S to 241-SY-101 Waste Transfer Procedure Was Vague and Subject to Interpretation Title: Performed Waste Transfer Operations Surveillance, IOS 17289-TF Scope: The U.S. Department of Energy, Office of River Protection conducted a surveillance of the Washington River Protection Solutions, LLC (WRPS) waste transfer process. The two main objectives were to determine compliance with safety basis and Conduct-of-Operations (Conops) requirements. Summary: The assessors followed several waste transfer activities, including Double-Shell-Tank (DST) to DST transfers and a DST recirculation activity. It performed oversight of the 222-S laboratory during transfers from their facilities to a DST. The assessment team concluded that WRPS plans for and conducts waste transfer activities in a controlled, deliberate manner. Safety basis hazard controls are properly administered during the planning and conduct of the activities. Conops controls are being implemented and adhered to. This report cites isolated instances of noncompliances and opportunities to improve processes and conduct in the field. Issues were provided to, and discussed with, WRPS Production Operations management personnel. ---------- Issue Type: Finding (Level 3) Significance Level: 2 Statement: 17289-TF-F01 - Shutdown Criteria in the 222-S to 241-SY-101 Waste Transfer Procedure Was Vague and Subject to Interpretation (Priority Level 3, Ciola) Discussion: During oversight of a transfer of waste between the 222-S 219-S facility and S Farm, the assessor found shutdown criteria, Table 1 of procedure ATS-LO-100-177, Transfer From 2195 Tank 102 to 241-SY-101, Rev. N-4, was subject to interpretation as evidenced by discussion with watch standers. Table 1 directed shutdown if there is, "Indication of significant pressure transient on transfer piping". Watchstanders provided various interpretations of this criteria from, "listen for a distinct noise" to, "look for movement of piping and components" or a combination of both. The shutdown criteria should be well-defined and understood by the individuals monitoring the parameter. Critical steps and criteria should be definitive and not subject to interpretation.
4/10/2018	WRPS-PER-2018-0929	Improper Entry Into and Exit from a Radiological Buffer Area and Improper Radiological Release of Material	TITLE of PER: Improper Entry Into and Exit from a Radiological Buffer Area and Improper Radiological Release of Material Title: Performed Waste Transfer Operations Surveillance, IOS 17289-TF Scope: The U.S. Department of Energy, Office of River Protection conducted a surveillance of the Washington River Protection Solutions, LLC (WRPS) waste transfer process. The two main objectives were to determine compliance with safety basis and Conduct-of-Operations (Conops) requirements. Summary: The assessors followed several waste transfer activities, including Double-Shell-Tank (DST) to DST transfers and a DST recirculation activity. It performed oversight of the 222-S laboratory during transfers from their facilities to a DST. The assessment team concluded that WRPS plans for and conducts waste transfer activities in a controlled, deliberate manner. Safety basis hazard controls are properly administered during the planning and conduct of the activities. Conops controls are being implemented and adhered to. This report cites isolated instances of noncompliances and opportunities to improve processes and conduct in the field. Issues were provided to, and discussed with, WRPS Production Operations management personnel. ---------- Issue Type: Finding (Level 3) Significance Level: 2 Statement: 17289-TF-F02 - Improper Entry Into and Exit from a Radiological Buffer Area and Improper Radiological Release of Material (Priority Level 3, Ciola) Discussion: The attached report contains a graphic (photograph). During a waste transfer activity, it was noted that a temperature surveillance was required to be taken within the AW Tank Farm perimeter. The temperature was taken by a Nuclear Chemical Operator on the outside of the farm who inserted a temperature probe into the fence line of the farm. This practice which had been routinely employed for waste transfers surveillances, constitutes an unauthorized entry into and exit from the posted radiological buffer area, and an unevaluated or surveyed item removed from the farm perimeter. Discussions with WRPS radiological controls personnel confirmed that the overall release of materials from radiological buffer areas at Tank Farms requires revisiting as there are inconsistencies in the application of release criteria at Retrieval Closure, Projects and Production Operations.
4/10/2018	WRPS-PER-2018-0930	Failure to Follow Alarm Response Procedure After a Leak Was Confirmed Into a Physically-Connected Structure During an Active	TITLE of PER: Failure to Follow Alarm Response Procedure After a Leak Was Confirmed Into a Physically-Connected Structure During an Active Waste Transfer Title: Performed Waste Transfer Operations Surveillance, IOS 17289-TF Scope: The U.S. Department of Energy, Office of River Protection conducted a surveillance of the Washington River Protection Solutions, LLC (WRPS) waste transfer process. The two main objectives were to determine compliance with safety basis and Conduct-of-Operations (Conops) requirements. Summary: The assessors followed several waste transfer activities, including Double-Shell-Tank (DST) to DST transfers and a DST recirculation activity. It performed oversight of the 222-S laboratory during transfers from their facilities to a DST. The assessment team concluded that WRPS plans for and conducts waste transfer activities in a controlled, deliberate manner. Safety basis hazard controls are properly administered during the planning and conduct of the activities. Conops controls are being implemented and adhered to. This report cites isolated instances of noncompliances and opportunities to improve processes and conduct in the field. Issues were provided to, and discussed with, WRPS Production Operations management personnel. ---------- Issue Type: Finding (Level 3) Significance Level: 2 Statement: 17289-TF-F03 - Failure to Follow Alarm Response Procedure After a Leak Was Confirmed Into a Physically-Connected Structure During an Active Waste Transfer (Priority Level 3, Ciola) Discussion: On March 17, 2018, during a Double-Shell Tank transfer there was a small leak from a component in a physically connected containment structure, 241-AP-102A pump pit. About 90 minutes into the transfer the leak detector came into alarm. The presence of approximately two to three gallons of waste was visually confirmed in the pit. A documentation review showed that the alarm response procedure was not followed. Step 7.3.2, ARP-T-041-00002, Response to Alarms at TFMCS HMI, Rev. E-9, requires: "IF absence of a leak cannot be confirmed, CONSULT engineering AND ENTER the Operability Evaluation Process."

4/10/2018	WRPS-PER-2018-0931	Inconsistencies in the Documentation of Controls During the Development of Waste-Impacting Operations Procedures	TITLE of PER: Inconsistencies in the Documentation of Controls During the Development of Waste-Impacting Operations Procedures Title: Performed Waste Transfer Operations Surveillance, IOS 17289-TF Scope: The U.S. Department of Energy, Office of River Protection conducted a surveillance of the Washington River Protection Solutions, LLC (WRPS) waste transfer process. The two main objectives were to determine compliance with safety basis and Conduct-of-Operations (Conops) requirements. Summary: The assessors followed several waste transfer activities, including Double-Shell-Tank (DST) to DST transfers and a DST recirculation activity. It performed oversight of the 222-S laboratory during transfers from their facilities to a DST. The assessment team concluded that WRPS plans for and conducts waste transfer activities in a controlled, deliberate manner. Safety basis hazard controls are properly administered during the planning and conduct of the activities. Conops controls are being implemented and adhered to. This report cites isolated instances of noncompliance's and opportunities to improve processes and conduct in the field. Issues were provided to, and discussed with, WRPS Production Operations management personnel. ---------- Issue Type: OFI (Opportunity for Improvement) Significance Level: 2 Statement: 17289-TF-O01 - Inconsistencies in the Documentation of Controls During the Development of Waste-Impacting Operations Procedures (Priority Level 3, Ciola) Discussion: See attached report for full discussion which includes graphics. REF: TOD Weekly 04-10-18; R Ciola; OFI; OA36160
4/10/2018	WRPS-PER-2018-0932	Industrial Hygiene Sample Plans Are Not Consistently Documented Across Work Groups	TITLE of PER: Industrial Hygiene Sample Plans Are Not Consistently Documented Across Work Groups Title: Performed Waste Transfer Operations Surveillance, IOS 17289-TF Scope: The U.S. Department of Energy, Office of River Protection conducted a surveillance of the Washington River Protection Solutions, LLC (WRPS) waste transfer process. The two main objectives were to determine compliance with safety basis and Conduct-of-Operations (Conops) requirements. Summary: The assessors followed several waste transfer activities, including Double-Shell-Tank (DST) to DST transfers and a DST recirculation activity. It performed oversight of the 222-S laboratory during transfers from their facilities to a DST. The assessment team concluded that WRPS plans for and conducts waste transfer activities in a controlled, deliberate manner. Safety basis hazard controls are properly administered during the planning and conduct of the activities. Conops controls are being implemented and adhered to. This report cites isolated instances of noncompliance's and opportunities to improve processes and conduct in the field. Issues were provided to, and discussed with, WRPS Production Operations management personnel. ---------- Issue Type: OFI (Opportunity for Improvement) Significance Level: 2 Statement: 17289-TF-O02 - Industrial Hygiene Sample Plans Are Not Consistently Documented Across Work Groups (Scrabeck) Discussion: WRPS should evaluate the differences in industrial hygiene sample plans (IHSPs) between work groups, in order to ensure more consistent and effective hazard and hazard monitoring communication. A comparison of operating procedures for Double-Shell Tank (DST) transfers and Single-Shell Tank (SST) retrievals shows that the requirements for IH sampling are not consistently documented, in that the DST Transfer procedures contain less detail. SST retrieval operating procedures list the IHSPs to be used, while DST Transfer procedures only state that there must be an IHSP approved. Additionally, while IHSPs prepared for DST Transfers only specify, "if requested by the Project Industrial Hygienist" for area monitoring requirements, the IHSPs prepared for SST retrievals contain significantly more detail for monitoring requirements. Specific locations of AreaRAEs along the transfer path are listed, along with the applicable modes of operation when which particular AreaRAEs are needed. This additional level of detail aids in more effectively communicating hazard monitoring to affected workers.
4/10/2018	WRPS-PER-2018-0933	Inattention to Alarms During a Waste Impacting Operation	TITLE of PER: Inattention to Alarms During a Waste Impacting Operation Title: Performed Waste Transfer Operations Surveillance, IOS 17289-TF Scope: The U.S. Department of Energy, Office of River Protection conducted a surveillance of the Washington River Protection Solutions, LLC (WRPS) waste transfer process. The two main objectives were to determine compliance with safety basis and Conduct-of-Operations (Conops) requirements. Summary: The assessors followed several waste transfer activities, including Double-Shell-Tank (DST) to DST transfers and a DST recirculation activity. It performed oversight of the 222-S laboratory during transfers from their facilities to a DST. The assessment team concluded that WRPS plans for and conducts waste transfer activities in a controlled, deliberate manner. Safety basis hazard controls are properly administered during the planning and conduct of the activities. Conops controls are being implemented and adhered to. This report cites isolated instances of noncompliance's and opportunities to improve processes and conduct in the field. Issues were provided to, and discussed with, WRPS Production Operations management personnel. ---------- Issue Type: OFI (Opportunity for Improvement) Significance Level: 2 Statement: 17289-TF-O03 - Inattention to Alarms During a Waste Impacting Operation (Ciola) Discussion: On Thursday, March 1, 2018, WRPS conducted the 241-AW-106 recirculation activity. Prior to the removal of the administrative locks at the 241-AP-271 building, the assessor noted an alarming AreaRAE positioned alongside the building. The assessor notified other workers to move upwind of the device and called in the alarm to the Central Shift Manager. Discussions with other workers in the area concluded that their experience is that the RAEs usually alarm due to a low battery, and as such there wasn't a heightened concern to heed the alarm.

4/10/2018	WRPS-PER-2018-0934	Watchstander Inattentive to Duties and Distracted During a Waste Transfer Activity	TITLE of PER: Watchstander Inattentive to Duties and Distracted During a Waste Transfer Activity Title: Performed Waste Transfer Operations Surveillance, IOS 17289-TF Scope: The U.S. Department of Energy, Office of River Protection conducted a surveillance of the Washington River Protection Solutions, LLC (WRPS) waste transfer process. The two main objectives were to determine compliance with safety basis and Conduct-of-Operations (Conops) requirements. Summary: The assessors followed several waste transfer activities, including Double-Shell-Tank (DST) to DST transfers and a DST recirculation activity. It performed oversight of the 222-S laboratory during transfers from their facilities to a DST. The assessment team concluded that WRPS plans for and conducts waste transfer activities in a controlled, deliberate manner. Safety basis hazard controls are properly administered during the planning and conduct of the activities. Conops controls are being implemented and adhered to. This report cites isolated instances of noncompliance's and opportunities to improve processes and conduct in the field. Issues were provided to, and discussed with, WRPS Production Operations management personnel. --- Issue Type: OFI (Opportunity for Improvement) Significance Level: 2 Statement: 17289-TF-004 - Watchstander Inattentive to Duties and Distracted During a Waste Transfer Activity (Ciola) Discussion: During the Double-Shell Tank transfer activity between 241-AP-108 to 241-AW-106, a watchstander was observed facing away from the display screen that was to be monitored, and reading a periodical. Tenets of Conops stipulated in TFC-PLN-05, Conduct of Operations Implementation Plan, Rev. F-7, dictate that watchstanders are attentive to their duties and not distracted. WRPS operations management immediately addressed the issues by communicating the expectation with the workforce in a Conops bulletin dated March 15, 2018.
4/10/2018	WRPS-PER-2018-0936	Development of Waste Retrieval and Transfer Operating Procedures (Including Water and Chemical Additions), Rev. C-5, should	TITLE of PER: Development of Waste Retrieval and Transfer Operating Procedures (Including Water and Chemical Additions), Rev. C-5, should be Evaluated to Include Material Balance Discrepancy Criteria Title: Performed Waste Transfer Operations Surveillance, IOS 17289-TF Scope: The U.S. Department of Energy, Office of River Protection conducted a surveillance of the Washington River Protection Solutions, LLC (WRPS) waste transfer process. The two main objectives were to determine compliance with safety basis and Conduct-of-Operations (Conops) requirements. Summary: The assessors followed several waste transfer activities, including Double-Shell-Tank (DST) to DST transfers and a DST recirculation activity. It performed oversight of the 222-S laboratory during transfers from their facilities to a DST. The assessment team concluded that WRPS plans for and conducts waste transfer activities in a controlled, deliberate manner. Safety basis hazard controls are properly administered during the planning and conduct of the activities. Conops controls are being implemented and adhered to. This report cites isolated instances of noncompliance's and opportunities to improve processes and conduct in the field. Issues were provided to, and discussed with, WRPS Production Operations management personnel. --- Issue Type: OFI (Opportunity for Improvement) Significance Level: 2 Statement: 17289-TF-005 - TFC-OPS-OPER-C-49, Development of Waste Retrieval and Transfer Operating Procedures (Including Water and Chemical Additions), Rev. C-5, should be Evaluated to Include Material Balance Discrepancy Criteria (Ciola) Discussion: The Material Balance Discrepancy (MBD) is a Defense-in-Depth (DID) control described in section 7.2.1 of HNFIP-1266, Tank Farms Operations Administrative Controls, Rev. 0g. It requires that during waste transfers material balance monitoring must be documented, including monitoring intervals, maximum discrepancy volumes, and response actions for discrepancies. The DID is fully described in Table 3.3.2.3 of RPP-13033, Tank Farms Documented Safety Analysis. Section 7.2.B of HNF-1266 requires that monitoring of the MBD be performed every 8 hours as a minimum. The basis for the 8-hour surveillance frequency is that the safety basis hazard addressed by this DID feature is a potential flammable gas deflagration caused by a misroute of waste into a waste transfer-associated structure (or other facility) or into a DST annulus. The surveillance frequency has been evaluated to be reasonably conservative and provides sufficient time to address the potential flammable gas hazards caused by waste misroutes and includes consideration of "as low as reasonably achievable" especially for workers performing radiation surveys.
4/10/2018	WRPS-PER-2018-0937	Resolution of Waste Transfer Material Balance Discrepancies, Rev. A-5,should be Evaluated to Include Current Practices for Es	TITLE of PER: Resolution of Waste Transfer Material Balance Discrepancies, Rev. A-5,should be Evaluated to Include Current Practices for Establishing Material Balance Discrepancy Criteria Title: Performed Waste Transfer Operations Surveillance, IOS 17289-TF Scope: The U.S. Department of Energy, Office of River Protection conducted a surveillance of the Washington River Protection Solutions, LLC (WRPS) waste transfer process. The two main objectives were to determine compliance with safety basis and Conduct-of-Operations (Conops) requirements. Summary: The assessors followed several waste transfer activities, including Double-Shell-Tank (DST) to DST transfers and a DST recirculation activity. It performed oversight of the 222-S laboratory during transfers from their facilities to a DST. The assessment team concluded that WRPS plans for and conducts waste transfer activities in a controlled, deliberate manner. Safety basis hazard controls are properly administered during the planning and conduct of the activities. Conops controls are being implemented and adhered to. This report cites isolated instances of noncompliance's and opportunities to improve processes and conduct in the field. Issues were provided to, and discussed with, WRPS Production Operations management personnel. --- Issue Type: OFI (Opportunity for Improvement) Significance Level: 2 Statement: 17289-TF-006 - TFC-ENG-CHEM-D-44, Resolution of Waste Transfer Material Balance Discrepancies, Rev. A-5, should be Evaluated to Include Current Practices for Establishing Material Balance Discrepancy Criteria (Ciola) Discussion: The Material Balance Discrepancy (MBD) is a Defense-in-Depth (DID) control described in section 7.2.1 of HNFIP-1266, Tank Farms Operations Administrative Controls, Rev. 0g. It requires that during waste transfers using a waste transfer pump, material balance monitoring must be documented, including monitoring intervals, maximum discrepancy volumes, and response actions for discrepancies. The DID is fully described in Table 3.3.2.3 of RPP-13033, Tank Farms Documented Safety Analysis. TFC-ENG-CHEM-D-44, Resolution of Waste Transfer Material Balance Discrepancies, Rev. A-5, provides guidance on the MBD process. Although its title infers that it only addresses discrepancy resolution, it also discusses criteria for establishing an initial MBD limit. It allows the MBD limit to account for inter-tank waste transfer line hold-up and level detecting device instrument error.

4/11/2018	WRPS-PER-2018-0947	222-S in Room 4K Hood 4, Primary and Secondary Waste Containers with labels not matching	While performing the second quarter Satellite Accumulation Area (SAA) inspections it was observed that in room 4K hood 4 the primary and secondary waste container labels did not match.
4/11/2018	WRPS-PER-2018-0944	Modification of RWP Site Form	During the Work Planning assessment it was discovered that Radiological Work Permit forms, A-6003-902, are being modified by many of the Radiological Control organizations. These modifications do not change the value of the form nor compromise safety in any way, however, site forms are not supposed to be modified from their predetermined printed state.
4/11/2018	WRPS-PER-2018-0945	Creating a shared area for storing the Proof of Concept forms	It was discovered during a Work Planning assessment that the Proof of Concept form, A-6007-118, is not easily retrievable by all WRPS facilities. This could result in performing the same or similar proof of concepts by other facilities for essentially the same tool or concept.

4/11/2018	WRPS-PER-2018-0946	Streamlining the ALARA Review process	During a work planning assessment it was determined that duplication of efforts regarding the creation of ALARA Reviews may be happening. ALARA Reviews with little or no value may be required by the current procedure.
4/11/2018	WRPS-PER-2018-0948	Waste bottle left out of SAA in Rm 1GA	While performing the second quarter Satellite Accumulation Area (SAA) inspections in room 1GA there was a waste bottle in the bench top SAA that was generated in room 1GA hood 1, which is also a SAA. It appears the bottle was removed from the hood SAA and left in the bench top SAA, which is not compliant with the WAC-173-303 waste regulations.
4/11/2018	WRPS-PER-2018-0949	Requirements to inspect and maintain asbestos containing materials	The requirements to inspect and maintain asbestos containing materials and potentially asbestos containing materials are not outlined in the environmental procedures that we currently have.

4/11/2018	WRPS-PER-2018-0950	BED Did Not Implement RCRA Contingency Plan	An Emergency Preparedness drill conducted on 3/7/18 simulated a deflagration in DST AP-108. The drill included an emergency response from the Hanford Fire Dept. initiated by a 911 call. HFD firefighters were required for incident mitigation and stabilization. The BED determined that the event did not require implementation of the RCRA Contingency Plan after conferring with the WRPS Environmental On-Call Rep. The BED reached an incorrect conclusion when evaluating the RCRA Contingency Plan criteria in TF-ERP-005, Step 2.1.7. As a result, Permit-required notifications were not identified. The following information, from the drill report , indicates the RCRA Contingency Plan "3-step criteria" were met during drill. The BED Assistant issued a SOEN message that a Site Area Emergency had been declared for deflagration in AP-108. This scenario included an explosion that meets Criteria 1. The explosion occurred in a dangerous waste management unit (AP-108) that is subject to a RCRA contingency plan. This meets Criteria 2b. The fire department was summoned by a 911 call and were needed to mitigate and stabilize the incident. This meets Criteria 3. The post-drill assessment did not recognize this incident was a RCRA Emergency. Failure to implement the RCRA Contingency Plan and perform required notifications during an actual RCRA Emergency could result in significant fines and penalties.
4/11/2018	WRPS-PER-2018-0951	problem with the breakers on the Protec Portable Safety Showers	There is a problem with the breakers on the Protec Portable Safety Showers. The current breakers are a home use type breaker that just pushes into it's seat. These breakers have been found to slip out of their position and are no longer seated properly. This can also be a concern for arc flash there for a safety issue.
4/11/2018	WRPS-PER-2018-0952	B-Farm Legacy Contamination	At approximately 9:30am this morning, while performing the monthly routine perimeter survey of B-Farm, (12) small spots of contamination were identified on the West fence line in an approximately 50-75 foot section on the south end of the fence line. No Alpha contamination was detected and the Beta-Gamma survey results of the (12) spots were as follows: 1. 2,000 dpm/100cm2 2. 2,500 dpm/100cm2 3. 4,000 dpm/100cm2 4. 15,000 dpm/100cm2 5. 15,000 dpm/100cm2 6. 20,000 dpm/100cm2 7. 20,000 dpm/100cm2 8. 20,000 dpm/100cm2 9. 25,000 dpm/100cm2 10. 26,000 dpm/100cm2 11. 40,000 dpm/100cm2 12. 200,000 dpm/100cm2 Again, No alpha contamination was identified on any of the (12) spots, and all the readings were direct readings with the dirt/tumbleweed mixture on the ground.

4/11/2018	WRPS-PER-2018-0954	manual freeze protection assessment	During the manual freeze protection assessment, SS SSCs (TEs, Jack Panels, Terminal Boxes, and multi switches) were being reviewed under LOIs. One LOI was to verify that the SECD components align with the design, TSRs, and applicable SREDs, and FSAs. I had some questions about the requirements that the SS SSCs referenced in the SPF SEC list, therefore on 4/4/18, a sample of SSCs were pulled into a spreadsheet that contained the SPF information to discuss with the CSE. When these were pulled, most of the How Met Documents listed a CGD for certain requirements. After the team assessment meeting held on Tuesday 4/10/18, further evaluation of the CGDs was requested to ensure those follow procedures and meet the requirements specified in the SREDs. When these same SSCs were pulled up today, 4/11/18, the TE CGDs were missing from the how met documents but the TEs were still ACTIVE. In the Safety Compliance log, it shows that the CGD was added, the item proposed for review, then ACTIVE, but does not show that it was removed. It was then identified that the CGD (CGD-50023-00) was revised to Rev 3 on 4/5/18. After reviewing the relationships for CGD-50023-00 Rev 2 and Rev 3, the requirements are shown for Rev 2, but are not present for Rev 3.
4/12/2018	WRPS-PER-2018-0955	ETF UV/OX Unplanned Shutdown	UV-2 System was brought to OPERATION at 1855 hours ran until 1929 hours when Control Room Operator received UV-2 OVERPRESSURE RELIEF. This brought ETF's Main Treatment Train to a shutdown condition due to another UV System Trip.
4/12/2018	WRPS-PER-2018-0956	An IHT was performing an 360 check on a government vehicle and noticed damage to the passenger side of the van	An IHT was performing an 360 check on a government vehicle and noticed damage to the passenger side of the van which included yellow paint from hitting some sort of post/bollard and scratches all along the passenger side. IHT immediately contacted an IHT supervisor and reported the problem before driving the car. The van has not been driven since the incident was reported.

4/12/2018	WRPS-PER-2018-0958	ETF V-14 was closed, it was discovered, the valve had a hairline crack	While proceeding through starting LERF Basin 42 Cover Pumping, procedure ETF-60M-007 states in part, "After water starts pouring out of the drain hose H-4, Close V-14." Once V-14 was closed, it was discovered, the valve had a hairline crack. The work was secured and system placed into a safe configuration and management was notified.
4/12/2018	WRPS-PER-2018-0828	HISI software grading checklist should be reviewed for opportunities associated with maintaining clarity, consistency	From FY2018-BUS-R-0318, the HISI software grading checklist should be reviewed for opportunities associated with maintaining clarity, consistency and adequacy with DOE and QA requirements.
4/12/2018	WRPS-PER-2018-0829	Purpose/Scope provided for some software HISI information was identified	From FY2018-BUS-R-0318, opportunities to improve the Purpose/Scope provided for some software HISI information was identified for improved clarity to the to avoid potential confusion around the TOC use, software capabilities and the graded approach.

4/12/2018	WRPS-PER-2018-0959	NCR Issued For Steel Used in C-111 and C-112 Sluicers	Material manufacturer KOBE steel and its related subsidiaries recently acknowledged that they had falsified material quality data. This issue has been previously addressed and an "Extent-of-Condition" review was initiated through actions assigned in WRPS-PER-2017-2556. As result of that review, it was determined that Kobe Special Tube Co., LTD., supplied stainless steel tubing used in equipment provided by "AGI Engineering" on 3 (three) WRPS Purchase Orders, (PO) 49313, 49648 and 51960. This material is quality indeterminate as no evidence has been found to independently validate that this stainless tubing conforms to specification and as a result has been reported on NCR number TF-18-NCR-005.
4/12/2018	WRPS-PER-2018-0960	TF-RC-009 GM Portable Survey Instrument Operation and Source Checks	While performing Technical Procedure reviews in accordance with RPP-RPT-60711 Radiological Control Improvement Plan / Effluent Treatment Facility, it was discovered that TF-RC-009 GM Portable Survey Instrument Operation and Source Checks is being performed compliantly but has some sequencing issues identified.
4/12/2018	WRPS-PER-2018-0961	AW-103 Encasement damage to the disconnect switch on the air dryer	During preparation to perform AW-103 Encasement Pressure Testing the FWS noted some minor damage to the disconnect switch on the air dryer. The damage had not been observed the previous day when the equipment had been staged and set up. The FWS reported that he had electricians look at the disconnect switch to ensure it could still meet it's intended function.

4/13/2018	WRPS-PER-2018-0962	Fire Lane blocked by pallets	There are several pallets of equipment being stored in a posted Fire Lane near 702-AZ.
4/13/2018	WRPS-PER-2018-0963	PT-60H-037 not registering proper discharge pressure	PT-60H-037 not registering proper discharge pressure when 60H-P-1A discharge pump was placed in Operation. Confirmed proper flow at FCV-60H-014 and NO abnormal noise / vibration at the pump. EAM review shows instrument was calibrated on 2-7-18 and we have not discharged a Verification tank in the interim time.
4/14/2018	WRPS-PER-2018-0964	AY101-WSTA-LDT-151 inoperable	Annulus leak detector AY101-WSTA-LDT-151 is inoperable due to a failed ON/OFF switch for the ENRAF.

4/14/2018	WRPS-PER-2018-0965	Vapor Compressor Oil Pressure	PI-60I-210, Vapor Compressor Oil Pressure, is reading just below the NORMAL range on ETF-OR-DR-STT (pg-9) of 11 - 13 when system in Operation, at 10psig.
4/14/2018	WRPS-PER-2018-0966	222-S Post Job needed for Room 4N Demolition	Daily post job reviews were not being conducted or discussed during the 4N demo work. MAINT-C-02 procedure no longer requires a daily post job for high risk work, but the progress of work could benefit from a daily review / update.
4/16/2018	WRPS-PER-2018-0967	242-A Conductivity Transmitters Could Not Be Calibrated	While performing the necessary pH and Conductivity transmitter maintenance for the 242-A evaporator campaign the Conductivity transmitters could not be calibrated. Engineering was asked to help figure this issue out. After a phone call to Foxboro it was discovered that the conductivity transmitter that are currently installed are very old technology and no longer supported by Foxboro.

4/16/2018	WRPS-PER-2018-0968	222-S Quarterly Finger Ring Replacement slower than normal response	Quarterly finger rings are due to the ACES Station or WHL Managers on the first day of each quarter. If the first of the month lands on a Friday, Saturday, or Sunday, the finger rings need to be returned on the following Monday. On 04/09/2018, the ACES Station at 222-S started to receive auto-issued finger rings from the previous quarter. The Dosimetry Facility Point-of-Contact (FPOC) had contacted the FWS asking where the worker's finger rings were located. He stated that he would contact the worker as he is in the Contamination Area (CA) right now. He asked the worker to come out of the area and return his finger rings. By the end of the day of 04/09, ACES had received 14 finger rings that were from the previous quarter. After reviewing all the worker's finger rings and entries that were made after 04/02/2018, I found that five workers had used their previous quarter finger rings. There was two workers who were under RWPs that did not require finger rings. Reminder emails were sent out on 04/05/2018 to the individual managers to remind them that their workers still had not returned their finger rings and that work restrictions would be applied on 04/09/2018. I received zero replies. All finger rings have been returned and are accounted for as of 04/16/2018.
4/16/2018	WRPS-PER-2018-0953	Concrete Placement Drawings Requirement Not Met	During the construction sequence for the A-Farm Exhauster Slab Retaining Wall Footings, A-Farm Construction was actively pursuing processing, review and approval of the Subcontractor's submittals required to support the upcoming placement of concrete for the A-Farm Exhauster Retaining Wall Footings. One of these required submittals was the Concrete Placement drawings, which details the proposed sequence, layout and size of the individual concrete placements required to construct the A-Farm Exhauster Retaining Wall Footings, Retaining Walls and Exhauster Slab (See Attachment). During the QAE Review of the Subcontractor's Concrete Placement Drawing submittal it was noticed that per the Construction Specification (RPP_SPEC-60023, Rev. 07, Section 03 30 00-4, Subsection 1.4, Paragraph B.-5) the concrete submittal requirements include: "Concrete Placement Drawings: Prior to setting of forms, submit placement drawings indicating planned placement sequence and locations of any planned joints, including those not shown on the Contract drawings". The Quality Assurance Engineer called this requirement to the attention of A-Farm Construction Management and it was immediately recognized that this requirement had not been met, as formwork for the footings was already substantially complete.
4/16/2018	WRPS-PER-2018-0970	Duplicate of WRPS-PER-2018-0964	AY101-WSTA-LDT-151 failed switch. Unable to take reading. ENRAF out of service.

4/16/2018	WRPS-PER-2018-0971	ETF Evaporator tripped to HOT STANDBY	ETF Evaporator tripped to HOT STANDBY when AOV-60I-108 did not open sufficiently when Density Meter required valve to open.
4/16/2018	WRPS-PER-2018-0975	Stop Work on the use and issuance of used empty waste boxes	Stop Work on the use and issuance of used empty waste boxes except those used for Beryllium contamination work with controls in place prior to opening the box, until Beryllium concerns are addressed.
4/16/2018	WRPS-PER-2018-0974	BY-101 level increased above its upper Specification limit	BY-101 level increased above its upper Specification limit on 4/12/18. It increased from 135.92 inches to 144.82 inches. the upper baseline is 139.2 inches. The waste surface in BY-101 is dry and extremely uneven. The location of the plummet for the ENRAF is located in an area with old discarded equipment and surface depressions. The cause of the level increase is due to the uneven surface and discarded equipment. Based on conclusions from WRPS-PER-2106-2506, the only other available 4" riser for the Enraf is only 26" away which is not far enough away to clear the uneven surface. This PER is being written to trend the BCA to increase the alarm levels for the Enraf to account for the uneven surface.

4/16/2018	WRPS-PER-2018-0972	222-S New GC High Resolution Time of Flight Mass Spec requiring connection to vacuum source	**Required actions to protect instrument components not performed after receipt of new laboratory equipment.** While requesting information to support the installation planning for the new GCxGC High Resolution Time of Flight Mass Spectrometer (referred to as BenchTOF) [Contract # 64314], I was notified by the vendor that the instrument should be connected to vacuum to protect the detector from moisture damage. I notified the assigned engineer ((b)(6)) and we contacted Facility Operations to obtain access to the instrument in 227-S. The instrument components were on several pallets on the upper shelf. The pallet with the BenchTOF was identified (Q64314 pallet 4 of 5). It had one large box with the BenchTOF and several small boxes packaged on top of it (see photo, BenchTOF Storage). When we removed the small boxes, we found the instructions for temporary vacuum connection taped to the exterior, on the top of the box (see photo, BenchTOF Instructions). The instructions state that if the BenchTOF has been delivered and the installation date will be more than 3 days after delivery, it should be connected to the provided roughing pump to protect the detector components (see attachment, "Connecting the rough pump to the BenchTOF.pdf). The instrument was shipped from the United Kingdom on 2/8/2018 and received at AVS on 2/12/18. It appears the AVS inspection was completed around 3/5/18 (see attachment, BenchTOF AVS) and the instrument was received at 222-S on 3/14/18. The instrument was received on-site on 2/8/18 and as of 4/16/18 is still not under vacuum as required by the vendor. This may result in damage to the detector components. Per the vendor, damage, if it occurred, will be obvious during installation and instrument acceptance testing, and if it occurred, the detector components will need replaced. The vendor believed this instrument would be installed quickly upon receipt, in which case the vacuum pump temporary install would not be needed; therefore, they did not mention this requirement beforehand (other than the notice on the packaging).
4/16/2018	WRPS-PER-2018-0976	While conducting excavation, the crew discovered a steel plate	On April 12, 2018, AEI performed excavation for the 241-AX North/South run. While conducting excavation, the crew discovered a steel plate at 1:09 pm. According to AEI's work package, the first notification of anomalies is to RADCON. After discovery, AEI Field Work Supervisor (FWS) made contact with RADCON First Line Supervisor, AEI supervisor, and engineering. In order to clarify for engineering what the crew looked at in the field, the crew used a rake to brush the top and sides of the steel plate. The FWS provided a picture and drawing number of the steel plate to engineering. On April 13, 2018, AEI contacted Construction Management to discuss the anomaly. AEI notified construction management that the steel plate found was not on a survey or line crossing report. In DAN18-0053, "...footprint expands the excavation area over and around tank domes. The expanded area is highly congested and it is not possible to associate scanned lines directly to underground lines identified in area." After discussion, Construction Management decided not to work the package. Construction Management and AEI FWS went to shift office to make notifications at 8:06. Shift Office made the determination to suspend package until a path forward is produced by construction management.
4/16/2018	WRPS-PER-2018-0969	222-S Missing Work Control Records Identified	Records for work package 247166, PMID 2S-105579, S-21 Stack annual ANSI sample probe maintenance could not be found during preparations for Washington State Department of Health air permit compliance inspection. The work package had been executed 6/13/17. The missing records were not identified until April 2018. Status of the records indicate that chain of custody for the work package was lost between WRPS PM Work Control and MSA Imaging. Missing records of permit required activities compromise the ability to demonstrate WRPS compliance during regulatory inspections.

4/17/2018	WRPS-PER-2018-0977	Omega Digital Thermometer, Model# HH200A Found Out-Of-Tolerance	Omega Digital Thermometer, Model# HH200A, Serial # 47846 (M&TE# 817-79-06-037) "As Found" reading during calibration was Out-Of-Tolerance. It was adjusted to manufacturer spec.
4/17/2018	WRPS-PER-2018-0993	Wall of Cubicle B1 in ETF admin bldg. 2025EA is flimsy	Wall of Cubicle B1 in ETF admin bldg. 2025EA is flimsy. I have observed people leaning against this wall and loosing balance. There's a risk they may fall and injure. Other cubicle walls are in similar condition.
4/17/2018	WRPS-PER-2018-0995	Kobe Steel, Ltd.Extent of Condition Review Finding	Kobe Steel, Ltd., acknowledged that it had falsified quality data on steel and other materials. As part of a WRPS led Extent-of-Condition vendor document review, Premier Technology, Inc. was found to have supplied Kobe related material in the fabrication of exhausters. This material (1in. x SCH40 SS Seamless Pipe, HT #V60293) supplied by "Kobelco Steel Tube Co., LTD., Shimonoseki Works" was used in fabrication of exhausters POR518 and POR519 supplied under WRPS PO 62065. This material is quality indeterminate as no evidence has been found to independently validate that this stainless tubing conforms to specification. Reference WRPS-PER-2017-2556.

4/17/2018	WRPS-PER-2018-0996	Kobe Steel, Ltd. Extent of Condition Review Finding 2	Kobe Steel, Ltd., acknowledged that it had falsified quality data on steel and other materials. As part of a WRPS led Extent-of-Condition review, Premier Technology, Inc. has indicated that Kobe related material was supplied by "Nipppon Steel & Sumikin Stainless Steel Corporation" which was used in fabrication of Exhausters POR518 and POR519. This material (1 - 1/4in. Hot Rolled SS Plate, HT #E79082) was incorporated into the fabrication of Exhausters supplied under PO 62065. This material is quality indeterminate as no evidence has been found to independently validate that this stainless steel plate conforms to specification. Reference WRPS-PER-2017-2556.
4/17/2018	WRPS-PER-2018-0994	ETF Radiological Control weekly routine # LE-W001 was not completed	The ETF Radiological Control weekly routine # LE-W001 was not completed in its entirely due to a connex in WRPS-RMA-072 being locked. WRPS-RMA-072 is made up of 2 connex boxes on the east side of ETF. These connex's are not normally locked. When (b)(6) tried to perform the survey and upon discovery that the south connex was locked they asked operation to unlock the connex. (b)(6) could not find the key and (b)(6) continued with all the other RMA's listed on the task description. The weekly task was signed off as complete in the task sign off book, but no notification were made to the RCFLM or Lead (b)(6). The missed RMA survey for the connex box was discovered during review of the radiological survey report.
4/17/2018	WRPS-PER-2018-0999	MOP performed an evaluation of the individual training plans for Core Procedures personnel	This MOP performed an evaluation of the individual training plans for Core Procedures personnel. The objective of this evaluation was to identify any potential improvements in course selections that would add/enhance training where appropriate, remove excessive courses, etc. MOP results are presented in the 7-page attachment to this report, and will be provided to Procedures management for review and to implement training plan changes deemed advisable.

4/17/2018	WRPS-PER-2018-1000	Building occupants have concerns about the quality of the air in 2025EA	ETF personal that routinely work or have offices in 2025EA express concern about the quality of the ventilation system that supports the building. Concerns raised range from overall dirtiness of the building, expressed exacerbation of personal conditions (allergies, tiredness, etc.) and an overall discomfort with the system. Due to the age of the building, no one is aware if the system has ever been properly cleaned in the life of the building. It is to the point some individuals have put ventilation filters on vents that when taken off show a filter that is dirtier than expected.
4/17/2018	WRPS-PER-2018-0997	242-A Evaporator DSA omission identified	During a review of the 242-A Evaporator DSA an omission was identified between the safety significant components portion of the C-A-1 Vessel Flammable Gas Control System boundary presented in the design analysis report (RPP-RPT-54583, Rev 7) and those presented in the 242-A Evaporator DSA (HNF-14755, Rev 6D). • Section 7.1 of RPP-RPT-54583 identifies the boundaries of the C-A-1 Vessel Flammable Gas Control System – specifically allocating both safety-significant components and the general service components, lines, and systems. The safety significant portion of the boundary includes "Instrument air line accumulators **242AEI-IA-ACC-001 and 242AEI-IA-ACC-002**." **• Section 4.4.1.2 of HNF-14755 identifies the boundary of the safety significant C-A-1 vessel flammable gas control system, and the air line accumulators have not been included.** Upon further research it was determined that the air line accumulators were added to the safety significant portion of the boundary within RPP-RPT-54583, as part of Rev 6 changes. The issuance of RPP-RPT-54583, Rev 6, was paired with a safety basis amendment (submitted via WRPS-1503262 and approved via 15-NSD-0026). 15-NSD-0026 includes a summary of comments prepared and dispositioned during the review of the amendment. Comment #4 asks why the accumulator isn't identified as SS, the WRPS response says, "The DAR and the FRED have been updated to identify the accumulator as SS with the associate critical characteristic being volume." The WRPS response clearly acknowledges the SS role of the air line accumulators which is reflected in the DAR (RPP-RPT-54583) and the FRED (RPP-RPT-53035) as well as within the Safety Equipment Compliance Database, but failed to recognize that the air line accumulators should have **been added to the boundaries identified in the DSA as well.** **The C-A-1 Vessel Flammable Gas Control System boundaries identified within HNF-14755 should be revised to include the air line accumulators.** **There are no potential inadequacies in the safety analysis associated with this issue. It was an omission and the accumulators have been implemented as SS in the field.** **Recommend this PER be screened as a TUF.** Recommend this PER be assigned to the Manager Nuclear Safety (b)(6) .
4/17/2018	WRPS-PER-2018-1001	Consumer Product Safety Commission (CPSC) Recall number 18-140 (04/17/2018)	Consumer Product Safety Commission (CPSC) Recall number 18-140 (04/17/2018) - see attachment 'CPSC Recall number 18-140 Schneider Electric Recalls Square D 30 60A Safety Switches Due to Electrical Shock Hazard.pdf' or attachment 'New OPEXSHARE article published - Schneider Electric Recalls Square D Safety **Switches Due to Electrical Shock Hazard'**. See also attached Inspection Procedure 'Inspection Reference PRB-207512 Square D Safety Switch 30 60A.pdf' for certain catalog numbers (listed below) manufactured within date codes 1401-1803 (January 1, 2014 - January 18, 2018 containing the directions for performing inspections and replacement. NOTE: Refer to **the inspection directions as page 2 indicates if the safety switch has green dot near packaging label it has been previously inspected & no further action would be required (figure 1 contained with Inspection Procedure).** Catalog #s potentially affected DU222RB, DU222RBUP, DU321RB, DU321RBUP, DU322RB, DU322RBUP, D211NRB, D211NRBCP, D221NRB, D221NRBCP, D221NRBUP, D321NRB, D321NRBCP, D321NRBUP, DU221RB, DU221RBUP, CD321NRB, DU321RBCP, DU322RBCP.

4/18/2018	WRPS-PER-2018-1002	log entries did not contain pertinent maintenance information that occurred on that day shift	During the weekly review of the ETF Control Room log for entries made on 4/12/18, it was noted that the log entries did not contain pertinent maintenance information that occurred on that day shift. As a result of this omission, the progression of Operational activities for the prior shift and that shift did not make complete sense. Typically the log reviews performed seem to carry adequate information to "tell the story" of activities. This was an anomally.
4/18/2018	WRPS-PER-2018-0924	AW Farm B-Train exhauster stack CAM had a transmitter failure alarm	AW Farm B-Train exhauster stack CAM had a transmitter failure alarm.
4/18/2018	WRPS-PER-2018-1004	WRPS-MOP-2018-1164 on ETF Pre-Job	The quality of the pre-job briefing for inlet filter exchanges on 04/18/18 was degraded by the following factors: 1) The pre-job briefing started 30 minutes late. 2) The Field Work Supervisor was overloaded. 3) The pre-job briefing was interrupted 5 times for reasons unrelated to filter exchanges. MOP Tour Report WRPS-MOP-2018-1164 provides detail on the observations that triggered this PER.

4/18/2018	WRPS-PER-2018-0939	Ecology inspection letter 18-NWP-053 concern #1: Walker Tanker Trailer	Ecology inspection letter 18-NWP-053: Walker Tanker Trailer Concern 1: During prior dangerous waste inspections (#17.593 and #17.592), WRPS has suggested Listed Waste History at Hanford Facility TSD Units is a designation record. For generators, designation records are described in WAC 173-303-210; for TSDs, records requirements are described in WAC 173-303-380. In either instance, a combination of analysis and knowledge sufficient to manage waste in accordance with the requirements of the WAC is required. The fact that tank waste compatibility testing is necessary indicates the waste codes and process information specified in Listed Waste History at Hanford Facility TSD Units is not sufficient information to reliably substitute for analysis of waste. Being insufficient, in part by not addressing characteristic or criteria hazards, Listed Waste History at Hanford Facility TSD Units does not represent acceptable knowledge (as defined in WAC 173-303-040) for the designation of dangerous waste. The statement in the Errata that waste "carries the same waste codes" is not the same as a waste designation.
4/18/2018	WRPS-PER-2018-0940	Ecology inspection letter 18-NWP-053 concern #2: burden of regulatory records requests	Ecology inspection letter 18-NWP-053: burden of regulatory records requests Concern 2) The time and labor involved in the current document clearance process presents a barrier to the flow of information that can delay finalization of inspections and permit modifications. A Government to Government exchange of documents should be resumed between USDOE and Ecology in order to meet requirements of Hanford Dangerous Waste Permit, Condition I.E.9.b. During the inspection I was told that USDOE had ceased government to government file transfers with Ecology because Ecology's strict public disclosure policies prompted USDOE to treat requests from Ecology as though they were requests from the public. Ecology has an agreement in place with USDOE (December 1, 2010, Ecology letter RE: National Security Sensitive Materials) regarding Ecology handling of Official Use Only information, and US DOE could take advantage of this agreement to expedite file transfers to Ecology.
4/18/2018	WRPS-PER-2018-0941	Ecology Inspection Letter 18-NWP-056: August 2017 RCRA inspection of 242-A	Ecology Inspection Letter 18-NWP-056: August 2017 RCRA inspection of 242-A Dangerous waste training plan does not appear to be sufficiently explicit in describing each position related to dangerous waste management and in describing the amounts of introductory and continuing training required for each identified position.

4/18/2018	WRPS-PER-2018-0942	Ecology inspection Letter 18-NWP-056 #2: August 2017 RCRA inspection of 242-A	Ecology Inspection Letter 18-NWP-056: August 2017 RCRA inspection of 242-A The letter identifies Concern #1 as follows: "Although the power surge would not be categorized as a loss of utilities, the power surge apparently caused the time delay relay (TDR-6) to malfunction and dump valves (HV-CA1-7 and HV-CA1-9) not to close automatically upon restarting of operations. The open dump valves (HV-CA1-7 and HV-CA1-9) led to an unplanned addition of approximately 6,765 gallons of water to Double Shell Tank 241-AW-102, a possible over pressurization, and the establishment of a vapor control zone at the 241-AW Tank Farm. Ecology should have been provided notification of this incident."
4/18/2018	WRPS-PER-2018-1005	AW01C Leak Detection Pit is above the normal range	AW01C Leak Detection Pit is above the normal range limit of 36". The current reading is 37". Trending shows a very slow rise in level and it well below the maximum authorized limit of 63" in OSD-T-151-0007.
4/18/2018	WRPS-PER-2018-1006	217AW Change Tent does not have a refrigerator.	217AW Change Tent does not have a refrigerator. Operator Nightshift Daily Rounds has them check and stock change trailer and change tent refrigerators. This will not meet the requirements for a cool down area when warmer temperatures arrive.

4/18/2018	WRPS-PER-2018-1007	disagreement in the use of Negative Exposure Assessment (NEA) data to dictate the Asbestos PPE and Control sets	During TPM for upcoming work at 242-A there was disagreement in the use of Negative Exposure Assessment (NEA) data to dictate the Asbestos PPE and Control sets. Control sets suggested by IH were different that ones used in the past and a compromise couldn't be reached. Craft asked that a stop work be issued.
4/19/2018	WRPS-PER-2018-1008	242A Process Condensate Valve 1-9	Upon start -up of the 242-A process condensate (PC) system, the P-C-100 pump failed to pump PC to LERF. After a walkdown of the system valving, it was discovered that valve 1-9 appeared to open but was not. The valve (rising stem) would turn, but not engage without significant effort. The valve was opened eventually.
4/19/2018	WRPS-PER-2018-1010	Lack of Desk instruction or guides for undocumented training processes	Lack of Desk instruction or guides for undocumented training processes Currently training lacks guides on how to perform many processes such as obtaining a TAS or course number, How is Vendor training numbered, what documentation needs to be turned in to Records. Much of this information and others is Expert based on tribal knowledge. Depending upon who a Training Specialists asks, they can get several different version of the process. This needs to be standardized within the organization for consistent , quality documentation.

4/19/2018	WRPS-PER-2018-1012	A worker inadvertently stepped across an RBA boundary without performing an RBA exit survey	A worker inadvertently stepped across an RBA boundary without performing an RBA exit survey. The observation was made at the AX Change tent at the RBA boundary to the HPT survey area. The worker was unaware that he had stepped over the RBA boundary. Two HPTs that were present stopped him immediately and informed him he had crossed the RBA boundary. They surveyed him and no contamination was detected. The RBA boundary is properly posted and the boundary line is clearly demarcated with yellow/magenta tape. This event is documented as part of MOP Tour WRPS-MOP-2018-1180.
4/19/2018	WRPS-PER-2018-1013	Vision use is not consistent	Vision use is not consistent. Training Specialists have different ways of creating material in Vision. Recently an employee left and others have tried to take over their work. It has cost many hours of several employees time to try and determine how the information for several qualification cards are captures in Vision. Recommend training or guides on consistent entry of information into Vision or the use of only one or two individuals to enter the material into Vision.
4/19/2018	WRPS-PER-2018-1014	Inconsistent handling of CBT material	Inconsistent handling of CBT material. Although WRPS is in transition to a new computer management system,we do not have a clear process on how to document review and approval of CBT materials. Currently Training Specialists are making their own approval sheets or using ones from the template for instructor led material. Many TSs are unclear even how to get a printout of the existing CBT material to send out for review. Even though the new system is more user friendly, not everyone in the organization knows how to work with it. We do have several TSs in each group that were sent to a training session on the new CMS, they were to be the contact points for each group. There is only a mention of developing a web based lesson plan in the ADD-C-01. There is no written description of the processes to develop,review and approve CBT training materials.

4/19/2018	WRPS-PER-2018-1016	exit to the 241-AX gate is not marked respiratory protection required	The exit to the 241-AX gate is not marked respiratory protection required past the gate, when the gate is open for vehicle access egress/access and the outer boundary is down on the ground. It is not obvious where the area ends past the fence for respiratory protection.
4/19/2018	WRPS-PER-2018-0617	interstitial liquid (ISL) in the solids has not been adequately sampled or modeled.	RPP-ASMT-62082, Implementation of DOE O 435.1 in Double-Shell Tank Integrity. The interstitial liquid (ISL) in the solids has not been adequately sampled or modeled. RPP 13639, Caustic Limits Report for Period Ending March 30, 2017, relies on best-basis inventory (BBI) estimation, which does not change for chemical and nuclear reactions. Core samples are needed soon in at least three tanks.
4/19/2018	WRPS-PER-2018-1003	Unplanned exhauster shutdown occurred for 296-S-25 A-Train	Unplanned exhauster shutdown occurred for 296-S-25 A-Train

4/19/2018	WRPS-PER-2018-1017	Radiological Survey Report (RSR) Review	1. During the performance of the March Production Operations Radiological Control Radiological Survey Report (RSR) Review, discrepancies were identified with 9 Radiological Survey Reports. 2. Discrepancies were communicated to respective RCFLMs for correction.
4/19/2018	WRPS-PER-2018-0998	Oil found in HPU units sent for disposal at ERDF	HPU units sent for disposal at ERDF were supposed to be drained of oil prior to shipment to ERDF. ERDF prepared to opened a port to address the void spaces inherent in the hydraulic fluid reservoir. Fluid started pouring out of the port before it could be completely opened. ERDF Waste Acceptance Criteria specifies that free liquids are not accepted at the disposal facility. Liquids in equipment are to be drained and residuals absorbed prior to sending for disposal per TO-100-052 and the ERDF waste Acceptance Criteria. Upon further examination of another unit, it too contained an estimated 5-10 gallons of oil. Absorbent could be seen in the reservoir but was not spread out and appeared to be predominantly dry. Thus a significant portion of the remaining fluid was not absorbed.
4/19/2018	WRPS-PER-2018-1019	OE Signature missing on Be work permit	Operations Management Signatures are missing on beryllium work permits that were provided by Industrial Hygiene and approved in WORA.

4/20/2018	WRPS-PER-2018-1020	Performing Routing STT operations and flushing activities at the Evaporator Skid	Performing Routing STT operations and flushing activities at the Evaporator Skid is impacted by the size of the existing Contamination Area. This requires partial zone entries and use of extension tools that can be ergonomically difficult. This contamination zone impacts HPT time / resources for routine operations and has been this way for far too long. It increases cost of doing work with the added PPE needed and LL waste produced. HPT's have provided great support to the STT operator, but it can have an impact on timely task completion when they are not available due to their own work load.
4/20/2018	WRPS-PER-2018-1022	Power strip recommendation	We use thousands of power strips at Hanford. Almost as many as the number of cell Phones used on site. Sooner or later we plug our phone into a power strip, but if the power strip is full... "Oh wait my PC has a USB port. I'll do it just this one Time" We all know our phones are not to be charged by our Computer stations, But the power strip is full.
4/21/2018	WRPS-PER-2018-1023	ETF VOG fans maintenance concern	While performing a monthly tickler to swap VOG fans, an NCO noticed that fan 45D-F-1B was only running on 1 belt, while 45D-F-1A had two belts but operated with excessive noise (when on-line) so the 45B-F-1B fan was left in operation, after attempting to switch fans. A quick search of EAM for past maintenance was unsuccessful in finding when the belts were replaced last. This may indicate a possibility that preventive maintenance work for the fans did not transfer over from the previous CHPRC Company Job Control System into WRPS's EAM database.

4/21/2018	WRPS-PER-2018-1025	60J-E-1 Vent Cooler of TFD	Work was performed on 60J-E-1 Vent Cooler of TFD and discovered build-up of dry process material inside piping. Work was placed in a safe condition of placing plastic sleeving over flanges of removed section of piping. Work package was suspended. Later found plastic sleeving over flanges might not provide an adequate barrier.
4/21/2018	WRPS-PER-2018-1026	Rm 4N Demolition minor issue with tile removal	Employees were removing floor tiles and cutting piping and cleaning up room. Heat gun was used to lift the floor tiles (Mastic on the bottom of tiles is Non-Friable Asbestos). A very small piece of tile slid under the Room 4N West door into 8H corridor (see attached photo). When the Asbestos Worker saw the rip in the barrier plastic/tape on the Room 4N West door and the hole from the burnt tape from the heat gun on the East door, he immediately re-taped the barrier per procedure. Odors from the melted plastic were reported in 8H corridor and near the change room.
4/21/2018	WRPS-PER-2018-1027	Current bio-cide injection system is outdated and not well setup for operation and maintenance.	Current bio-cide injection system is outdated and not well setup for operation and maintenance. For example replacing the chemical or accessing the injection pump. There is also a question about accessing a nearby safety shower. There is currently a large stainless catch (not factory made) that only houses the small pump and adds considerable clutter and wasted space in the room.

4/23/2018	WRPS-PER-2018-1028	Alnor Thermal Anemometer OOT condition	Alnor Thermal Anemometer, Model# AVM440-A, Serial #AVM441244002 (M&TE# 817-28-01-017) "As Found" reading during calibration was Out-Of-Tolerance. It was adjusted to manufacturer spec.
4/23/2018	WRPS-PER-2018-1029	ETF contamination found outside 2025 ED facility	During the performance of a Scheduled Radiation Survey Task Description (LE-D012) at ETF, contaminated tumbleweed fragment were discovered. Total Contamination of; SE Fence Line by 2025ED (Non Radiological areas): Location # 1: 38,000 dpm/100 cm2 Beta-Gamma and <500 dpm/100 cm2 Alpha, Location # 2: 6,000 dpm/100 cm2 Beta-Gamma and <500 dpm/100 cm2 Alpha No removable contamination was detected. The locations were deconned. Survey results are documented in Survey Simple on survey # LE-1800772
4/23/2018	WRPS-PER-2018-1030	SCBA staging areas	A EAPC safety log book entry was made on the 3/12/18 that had to do with not having SCBA equipment at the egress tents that have been used in several farms for emergency response. The question is if they are required in the change trailers, why not have them in the egress tents as well. Contacted emergency response manager and he sent the following response; "WRPS does not have a requirement for SCBA to placement in certain locations to support Emergency Response, from DOE Orders or the WAC. These perhaps were placed in these locations by OPS for our personnel to support HFD during an emergency or a quick entry into a farm due to a AOP." One scenario is that if there is no requirement for this SCBA equipment to be staged at the farm entrances (trailers,Tents), should the ones that are out there be removed and put into service? There have been several job not worked because the lack of equipment. Another scenario is that we stage the SCBA equipment at all egress entrances(trailers and Tents), for emergency response if and when we come off SCBA in the farms.

4/23/2018	WRPS-PER-2018-1031	ETF contamination bird egg shell	During the performance of a Scheduled Radiation Survey Task Description (LE-D012) at ETF, a contaminated bird egg was discovered. Total Contamination of; Gravel outside 2025E. (Non-Radiological Area): Location # 1: 142,800 dpm/100 cm2 Beta-Gamma and 28 dpm/100 cm2 Alpha, No removable contamination was detected. The location was deconned. Survey results are documented in Survey Simple on survey # LE-1800785.
4/23/2018	WRPS-PER-2018-1021	IH Tech entered 222-S contamination area without PPE	Contrary to the requirements of RWP S-876, WRPS Employee entered Contamination Area with out proper PPE
4/23/2018	WRPS-PER-2018-1009	222-S Work Scope inadequately reported to WWA/WWM for resource loading	Less than accurate work scope reported to Work Week Authority / Work Week Manager lead to possibly providing insufficient resources to job. Specifically, vendor support for Reliant instrument in 11A hotcells was scheduled. During the plan of the week meeting, the analytical services provider agreed to use the assigned 11A HPT to support the work. However, on the day of the job, it was determined that the work was taking place in both room 11A and room 45, which would have required a dedicated HPT, not the 11A HPT.

4/23/2018	WRPS-PER-2018-1011	WHL employe exits RBA/RMA without performing exit survey	WHL employee exited RBA/RMA in the count room without performing required exit survey.
4/23/2018	WRPS-PER-2018-1034	A review of the Respirable Silica Exposure Control TFC-ESHQ-S_IH_STD-68	A review of the Respirable Silica Exposure Control TFC-ESHQ-S_IH_STD-68 and the findings indicate that the procedures needs to be modified or changed to address concerns listed below: a) The designation of an Airborne Silica Compliance Plan has no site form number. b) The competent person designated by the procedure is not listed as part of the Qualified/Competent Persons (TFC-ESHQ-STD-29, REV A-3) c) The competent person designation of appropriate training is not specified as to what training is required. d) The procedure indicates in section 3.2.6 Worker notification of 5 days and section 3.3.5 Worker notification within 15 working day after receipt of the monitoring results. e) The procedure indicates in section 3.3.8 Selection of Respirators Worker are to select and use respiratory appropriate for work performed. Should be as designated by the IH and Rad Engineer for work activity.
4/23/2018	WRPS-PER-2018-1035	RPP-RPT-60711, "Radiological Control Improvement Plan / Effluent Treatment Facility", Line Item 1.	This MOP tour is driven by RPP-RPT-60711, "Radiological Control Improvement Plan / Effluent Treatment Facility", Line Item 1. The action is to review recent performance against the facility schedule to determine if Radiological Control is effectively supporting the scheduled activities. A review was performed on survey reports recorded in Survey Simple over the period 03/19/18 through 04/16/18. The data indicates that Production Operations Health Physics Technicians supported 48 activities that required radiological job coverage and they completed 193 required radiological surveillances.The 48 job coverage assignments involved 5 tanker unloading operations, 12 routine instrument calibrations, 21 assorted maintenance activities, 4 Operations sampling efforts and 1 waste handling activity. The 193 required radiological surveillances included 84 daily surveillances, 101 weekly surveillances, and 8 monthly/quarterly surveillances.A review of the March performance report issued by the ETF Integration Manager indicated that 49 of 309 scheduled activities were delayed. Only 1 of the 49 work delays were attributed to a lack of support from Radiological Control. On Tuesday, March 27, two Health Physics Technicians called in for unplanned absences resulting in an unexpected shortage of technicians. Insulation repairs had to be postponed due to (b)(6) shortage.The event on Tuesday, March 27 appears to be an isolated event. All other indications are that Radiological Control is fully supporting the work schedule at the Effluent Treatment Facility. There were no other work delays attributed to Radiological Control and the large number of surveys that were completed indicates (b)(6) are supporting work.

4/23/2018	WRPS-PER-2018-1036	Employee backed into a utility pole north of 241-C farm	Employee backed into a utility pole north of 241-C farm
4/23/2018	WRPS-PER-2018-1037	MOP/WSV ETF corrective maintenance reports	I pulled the corrective maintenance reports for each area Team on 4/23/18. The report reflects the corrective maintenance backlog for each area team as of 3/31/18. The purpose of the review was to verify the priority assigned for the work packages in each team's respective backlog. One year ago a similar review was performed and there were several work packages that were assigned a work priority of Urgent or High, but yet were over 365 days old. That would be inconsistent with the priority definitions contained in TFC-OPS-MAINT-C-01, Attachment C. The definitions in TFC-OPS-MAINT-C-01 are:PriorityDescriptionUrgentRequires immediate action to:*Prevent imminent danger to personnel, property, or the environment;*Prevent a significant breach in security.*It is worked without delay or interruption until the condition is stabilized.NOTE: Does not necessarily, but could, meet the conditions to declare at least an operational emergency.1 - (Rapid) Does not meet conditions for urgent work, but requires rapid action to:*Correct a condition that will result in a permit violation or regulatory compliance violation if not corrected immediately;*Correct a significant personnel safety deficiency as determined by management;*Correct problems deemed critical to sustain the current mission of a facility to include preventing programmatic impact, property loss, or financial impact;*Recovery from a TSR violation;*Correct conditions that cause major impacts to security response or mission;*Place or maintain the facility/activity/site in a safe condition when a potential inadequate safety analysis (PISA) is identified.2 - (High)Does not meet conditions for immediate work, but requires responsive action to:*Correct a condition that will result in a permitted facility or other ES&H regulatory compliance violation if not corrected (including compliance driven preventive maintenance);*Support milestones required by a court-ordered settlement agreement or to prevent a significant negative impact to facility/programmatic mission;*Correct a safety deficiency that requires immediate action and is likely to cause an injury to personnel that cannot be prevented by appropriate personal protective equipment (PPE) or barriers;*Correct conditions that cause significant impacts to security response or mission;*Correct conditions resulting in a USQ;NOTE: Priority may be adjusted up or down, depending on evaluation of safety or impact to mission.*Correct conditions resulting in the identification of a potential inadequate safety analysis (PISA); NOTE: Priority may be adjusted up or down, depending on evaluation of safety or impact to mission.*Correct deficient conditions for safety SSCs to restore operability.NOTE: Priority may be adjusted up or down, depending on LCO Required Action Completion Times, evaluation of safety, or impact to mission.This review did not look at those work packages prioritized as Medium or Low.In reviewing the CM backlog for the area teams, the following items were identified: o Team ETF had 15 work packages total in their backlog. Of the 15, 8 were categorized as Urgent (1), Rapid (1) or High (6). As of 4/23/18 the Urgent work package was 394 days old. The Rapid work package was 522 days old and the High rated work packages ranged from 608 - 254 days old. Based upon the criteria set forth in MAINT-C-01, these work packages are not currently categorized with the proper priority. An Urgent work package (as defined above) requires IMMEDIATE ACTION and is to be worked without delay or interruption until the condition is stabilized. Similarly, work packages prioritized as Rapid or High require rapid or responsive action to address the situation. The work packages may have been prioritized at one time, however, it is difficult to imagine a scenario where a "Rapid" categorized work package is rapid 522 days after identification with the work package statused as "Ready for Work." The "Urgent" work package is statused as "In Planning", yet is 394 days old. Of the six (6) work packages prioritized as "High", 3 are statused as "Working" and the other 3 as "In Planning."
4/23/2018	WRPS-PER-2018-1038	MOP/WSV 242A maintenance reports	I pulled the corrective maintenance reports for each area Team on 4/23/18. The report reflects the corrective maintenance backlog for each area team as of 3/31/18. The purpose of the review was to verify the priority assigned for the work packages in each team's respective backlog. One year ago a similar review was performed and there were several work packages that were assigned a work priority of Urgent or High, but yet were over 365 days old. That would be inconsistent with the priority definitions contained in TFC-OPS-MAINT-C-01, Attachment C. The definitions in TFC-OPS-MAINT-C-01 are:PriorityDescriptionUrgentRequires immediate action to:*Prevent imminent danger to personnel, property, or the environment;*Prevent a significant breach in security.*It is worked without delay or interruption until the condition is stabilized.NOTE: Does not necessarily, but could, meet the conditions to declare at least an operational emergency.1 - (Rapid) Does not meet conditions for urgent work, but requires rapid action to:*Correct a condition that will result in a permit violation or regulatory compliance violation if not corrected immediately;*Correct a significant personnel safety deficiency as determined by management;*Correct problems deemed critical to sustain the current mission of a facility to include preventing programmatic impact, property loss, or financial impact;*Recovery from a TSR violation;*Correct conditions that cause major impacts to security response or mission;*Place or maintain the facility/activity/site in a safe condition when a potential inadequate safety analysis (PISA) is identified.2 - (High)Does not meet conditions for immediate work, but requires responsive action to:*Correct a condition that will result in a permitted facility or other ES&H regulatory compliance violation if not corrected (including compliance driven preventive maintenance);*Support milestones required by a court-ordered settlement agreement or to prevent a significant negative impact to facility/programmatic mission;*Correct a safety deficiency that requires immediate action and is likely to cause an injury to personnel that cannot be prevented by appropriate personal protective equipment (PPE) or barriers;*Correct conditions that cause significant impacts to security response or mission;*Correct conditions resulting in a USQ;NOTE: Priority may be adjusted up or down, depending on evaluation of safety or impact to mission.*Correct conditions resulting in the identification of a potential inadequate safety analysis (PISA); NOTE: Priority may be adjusted up or down, depending on evaluation of safety or impact to mission.*Correct deficient conditions for safety SSCs to restore operability.NOTE: Priority may be adjusted up or down, depending on LCO Required Action Completion Times, evaluation of safety, or impact to mission.This review did not look at those work packages prioritized as Medium or Low.In reviewing the CM backlog for the area teams, the following items were identified: o Team EV 2 corrective maintenance work packages in the backlog, with 1 categorized as a "High" priority. This work package is 204 days old and statused as "In Planning."

4/23/2018	WRPS-PER-2018-1039	MOP/WSV corrective maintenance reports	I pulled the corrective maintenance reports for each area Team on 4/23/18. The report reflects the corrective maintenance backlog for each area team as of 3/31/18. The purpose of the review was to verify the priority assigned for the work packages in each team's respective backlog. One year ago a similar review was performed and there were several work packages that were assigned a work priority of Urgent or High, but yet were over 365 days old. That would be inconsistent with the priority definitions contained in TFC-OPS-MAINT-C-01, Attachment C. The definitions in TFC-OPS-MAINT-C-01 are:PriorityDescriptionUrgentRequires immediate action to:*Prevent imminent danger to personnel, property, or the environment;*Prevent a significant breach in security.*It is worked without delay or interruption until the condition is stabilized.NOTE: Does not necessarily, but could, meet the conditions to declare at least an operational emergency.1 - (Rapid) Does not meet conditions for urgent work, but requires rapid action to:*Correct a condition that will result in a permit violation or regulatory compliance violation if not corrected immediately;*Correct a significant personnel safety deficiency as determined by management;*Correct problems deemed critical to sustain the current mission of a facility to include preventing programmatic impact, property loss, or financial impact;*Recovery from a TSR violation;*Correct conditions that cause major impacts to security response or mission;*Place or maintain the facility/activity/site in a safe condition when a potential inadequate safety analysis (PISA) is identified.2 - (High)Does not meet conditions for immediate work, but requires responsive action to:*Correct a condition that will result in a permitted facility or other ES&H regulatory compliance violation if not corrected (including compliance driven preventive maintenance);*Support milestones required by a court-ordered settlement agreement or to prevent a significant negative impact to facility/programmatic mission;*Correct a safety deficiency that requires immediate action and is likely to cause an injury to personnel that cannot be prevented by appropriate personal protective equipment (PPE) or barriers;*Correct conditions that cause significant impacts to security response or mission;*Correct conditions resulting in a USQ;NOTE: Priority may be adjusted up or down, depending on evaluation of safety or impact to mission.*Correct conditions resulting in the identification of a potential inadequate safety analysis (PISA); NOTE: Priority may be adjusted up or down, depending on evaluation of safety or impact to mission.*Correct deficient conditions for safety SSCs to restore operability.NOTE: Priority may be adjusted up or down, depending on LCO Required Action Completion Times, evaluation of safety, or impact to mission.This review did not look at those work packages prioritized as Medium or Low.In reviewing the CM backlog for the area teams, the following items were identified: o The Retrieval/Closure Team had eight (8) work packages in their backlog, with 1 prioritized as "Urgent" and 1 prioritized as "High." The work package Urgent is status as working and is 259 days old. The High prioritized work package is statused as working and is 226 days old.
4/23/2018	WRPS-PER-2018-1040	MOP/WSV corrective maintenance reports	I pulled the corrective maintenance reports for each area Team on 4/23/18. The report reflects the corrective maintenance backlog for each area team as of 3/31/18. The purpose of the review was to verify the priority assigned for the work packages in each team's respective backlog. One year ago a similar review was performed and there were several work packages that were assigned a work priority of Urgent or High, but yet were over 365 days old. That would be inconsistent with the priority definitions contained in TFC-OPS-MAINT-C-01, Attachment C. The definitions in TFC-OPS-MAINT-C-01 are:PriorityDescriptionUrgentRequires immediate action to:*Prevent imminent danger to personnel, property, or the environment;*Prevent a significant breach in security.*It is worked without delay or interruption until the condition is stabilized.NOTE: Does not necessarily, but could, meet the conditions to declare at least an operational emergency.1 - (Rapid) Does not meet conditions for urgent work, but requires rapid action to:*Correct a condition that will result in a permit violation or regulatory compliance violation if not corrected immediately;*Correct a significant personnel safety deficiency as determined by management;*Correct problems deemed critical to sustain the current mission of a facility to include preventing programmatic impact, property loss, or financial impact;*Recovery from a TSR violation;*Correct conditions that cause major impacts to security response or mission;*Place or maintain the facility/activity/site in a safe condition when a potential inadequate safety analysis (PISA) is identified.2 - (High)Does not meet conditions for immediate work, but requires responsive action to:*Correct a condition that will result in a permitted facility or other ES&H regulatory compliance violation if not corrected (including compliance driven preventive maintenance);*Support milestones required by a court-ordered settlement agreement or to prevent a significant negative impact to facility/programmatic mission;*Correct a safety deficiency that requires immediate action and is likely to cause an injury to personnel that cannot be prevented by appropriate personal protective equipment (PPE) or barriers;*Correct conditions that cause significant impacts to security response or mission;*Correct conditions resulting in a USQ;NOTE: Priority may be adjusted up or down, depending on evaluation of safety or impact to mission.*Correct conditions resulting in the identification of a potential inadequate safety analysis (PISA); NOTE: Priority may be adjusted up or down, depending on evaluation of safety or impact to mission.*Correct deficient conditions for safety SSCs to restore operability.NOTE: Priority may be adjusted up or down, depending on LCO Required Action Completion Times, evaluation of safety, or impact to mission.This review did not look at those work packages prioritized as Medium or Low.In reviewing the CM backlog for the area teams, the following items were identified: o ST Team had six (6) work packages in the CM Backlog, with 1 item prioritized as "Rapid." This work package is 274 days old and statused as "Working."
4/23/2018	WRPS-PER-2018-1041	MOP/WSV corrective maintenance reports	I pulled the corrective maintenance reports for each area Team on 4/23/18. The report reflects the corrective maintenance backlog for each area team as of 3/31/18. The purpose of the review was to verify the priority assigned for the work packages in each team's respective backlog. One year ago a similar review was performed and there were several work packages that were assigned a work priority of Urgent or High, but yet were over 365 days old. That would be inconsistent with the priority definitions contained in TFC-OPS-MAINT-C-01, Attachment C. The definitions in TFC-OPS-MAINT-C-01 are:PriorityDescriptionUrgentRequires immediate action to:*Prevent imminent danger to personnel, property, or the environment;*Prevent a significant breach in security.*It is worked without delay or interruption until the condition is stabilized.NOTE: Does not necessarily, but could, meet the conditions to declare at least an operational emergency.1 - (Rapid) Does not meet conditions for urgent work, but requires rapid action to:*Correct a condition that will result in a permit violation or regulatory compliance violation if not corrected immediately;*Correct a significant personnel safety deficiency as determined by management;*Correct problems deemed critical to sustain the current mission of a facility to include preventing programmatic impact, property loss, or financial impact;*Recovery from a TSR violation;*Correct conditions that cause major impacts to security response or mission;*Place or maintain the facility/activity/site in a safe condition when a potential inadequate safety analysis (PISA) is identified.2 - (High)Does not meet conditions for immediate work, but requires responsive action to:*Correct a condition that will result in a permitted facility or other ES&H regulatory compliance violation if not corrected (including compliance driven preventive maintenance);*Support milestones required by a court-ordered settlement agreement or to prevent a significant negative impact to facility/programmatic mission;*Correct a safety deficiency that requires immediate action and is likely to cause an injury to personnel that cannot be prevented by appropriate personal protective equipment (PPE) or barriers;*Correct conditions that cause significant impacts to security response or mission;*Correct conditions resulting in a USQ;NOTE: Priority may be adjusted up or down, depending on evaluation of safety or impact to mission.*Correct conditions resulting in the identification of a potential inadequate safety analysis (PISA); NOTE: Priority may be adjusted up or down, depending on evaluation of safety or impact to mission.*Correct deficient conditions for safety SSCs to restore operability.NOTE: Priority may be adjusted up or down, depending on LCO Required Action Completion Times, evaluation of safety, or impact to mission.This review did not look at those work packages prioritized as Medium or Low.In reviewing the CM backlog for the area teams, the following items were identified: o AY/AZ Team had seven (7) work packages in the CM Backlog, with 1 item prioritized as "Rapid." This work package is 239 days old and statused as "In Planning.

4/23/2018	WRPS-PER-2018-1042	ETF Bird droppings	contaminated bird droppings and eggs found on or near ETF external tanks.ie(verification, surge, acid and caustic)
4/23/2018	WRPS-PER-2018-1033	AY-101 sampling event AOP-011	During the sampling evolution at AY-101, contamination was found outside the certified Glove-bag. The newly developed crane (retrieval sampling device) for sampling, appears to collect water/contamination in the rear portion of the acrylic box.. This new design has contamination building-up, inside the box , and the chemicals from the waste are enough to erode through the acrylic box, where the seams come together at the bottom of the box.
4/23/2018	WRPS-PER-2018-1044	AW encasement press test using wrong units	On Tuesday April 17, 2018 Encasement Pressure Testing was performed at AW03A Slurry Line SL-163. During this process, an M&TE Calibrated Thermometer and Pressure Gauge were used to acquire readings necessary for Engineering. Testing was performed in accordance with procedure TO-140-170 and the Work Instructions in WO#378455. Present during the testing were Engineering, IQRPE, QAT, Craft Personnel, and Field Supervision. The testing was performed and reported as "completed successfully". On Wednesday, April 18, 2018 preparations began for testing of Supernatant Line SN-263. After completing the pre-requisites and valve alignment, pressurization began, according to the procedure. At this time, it was noted that the pressure gauge was showing a different reading than the day before. A decimal point was noted that hadn't been seen on the display the day before. Engineering had taken pictures on 4/17/2018 of the pressure gauge and its reading during SL-163 testing. While comparing the picture from 4/17/2018 to the display present on 4/18/2018, it was noted that on 4/17/2018, the gauge was inadvertently set to MPA or Megapascal Units instead of the required PSIG or Pounds Per Square Inch Gauge. In analyzing the picture, all present agreed that the testing done on 4/17/2018 did not meet the requirements for successful completion of this Encasement Pressure Test. Management was immediately notified of this event.

4/23/2018	WRPS-PER-2018-1018	A-104 contamination	10,000 dpm/100cm2 beta-gamma removable contamination was found on the housing of the A-104 breather filter (Emission Unit 88) during annual routine radiological surveys of breather filter housings in 241-A Tank Farm.
4/24/2018	WRPS-PER-2018-1050	During the performance of a Scheduled Radiation Survey Task Description (LE-D012) at ETF, a contaminated bird egg shell was d	During the performance of a Scheduled Radiation Survey Task Description (LE-D012) at ETF, a contaminated bird egg shell was discovered. Total Contamination of; Surge Berm (Radiological Buffer Area): Location # 1: 14,650 dpm/100 cm2 Beta-Gamma and <500 dpm/100 cm2 Alpha, No removable contamination was detected. The egg shell was properly disposed of. Survey results are documented in Survey Simple on survey # LE-1800795
4/24/2018	WRPS-PER-2018-1051	6-FCD-720 "Air Rotameter Calibration Verification and Adjustment"	There seems to be a discrepancy between the tolerance requirements specified in procedure 6-FCD-720 "Air Rotameter Calibration Verification and Adjustment" and the corresponding Data Sheet. 6-FCD-720 step 5.6.3 (see attachment) states ...is not within tolerance per Data Sheet (+- 15% of tested value)... but the range of values on the Data Sheet (see attached) is +-10%.

4/24/2018	WRPS-PER-2018-1052	ALARA Review	ALARA Review signature approvals were not completed in a timely manner. AR-18-03, AR-18-08 and AR-18-23.
4/24/2018	WRPS-PER-2018-1053	SPF Approvals	If a name has erroneously been added to the workflow, SPF allows another individual to complete a step in the workflow for that individual. This creates ambiguous and FALSE information in the record. SPF shows a Signed Off date and the box is green indicating the step is Signed Off. Yet the individual never reviewed the document nor had anything to do with the document - the record indicates otherwise. The HPI Survival Guide states "Because a signature or initials (including electronic) reflects one's professionalism and character, it is important that personnel not give away their signature. The workflow indicates that the individual has Signed Off a step, which results in the signature being given away.
4/24/2018	WRPS-PER-2018-1054	Heise Pressure Module, Model # HM2-1, Serial #HM2-62992	Heise Pressure Module, Model # HM2-1, Serial #HM2-62992 (M&TE # 817-13-01-0258) "As Found" reading during calibration was Out-Of -Tolerance. It was adjusted to manufacturer spec.

4/24/2018	WRPS-PER-2018-1055	SCBA Disinfectant	A complaint was lodged about surveying respiratory masks with a GM Instrument in all Tank Farm Tents last year without proper disinfection of instrument probes. The fix was developed without properly identifying all of the issues involved. We are now forced by procedure the use carcinogenic wipes (Lysol/Clorox) on our probes as a disinfectant. This is a band aid not encompassing the real issue. Several times a day individuals purge their regulators while leaving the area or during a bottle change. In purging their regulators and being backlit by a doorway or a window a visible plume of spit and snot can be seen aerosolizing in the air. This is done in these tents up to hundreds of times per day. I have even had them purge directly in my face and you get splattered with spit and snot. In addition the Lysol/Clorox wipes are damaging our equipment and dissolving all calibration stickers.
4/24/2018	WRPS-PER-2018-1056	Hesie Pressure Module, Model # HM2-1, Serial # HM2-62969 (M&TE# 817-13-01-025A) "As Found"	Hesie Pressure Module, Model # HM2-1, Serial # HM2-62969 (M&TE# 817-13-01-025A) "As Found" reading during calibration was Out-Of-Tolerance. It was adjusted to manufacturer spec.
4/24/2018	WRPS-PER-2018-1057	Heise Pressure Module, Model #HM2-2, Serial# HM2-62996 (M&TE# 817-13-01-025D)	Heise Pressure Module, Model #HM2-2, Serial# HM2-62996 (M&TE# 817-13-01-025D) "As Found" reading during calibration was Out-Of-Tolerance. It was adjusted to manufacturer spec.

4/24/2018	WRPS-PER-2018-1058	Revise RPP-16922 to change from AP801-RW-BFP-102 to AP801-RW-BFP-001 in Table 4-1 and Table 11-6.	The AP-801 Service Water Piping Replacements Mod Traveler, MT-50215, is ready to close except for a revision to RPP-16922, ENVIRONMENTAL SPECIFICATION REQUIREMENTS. The backflow preventer was replaced and has a new EIN which needs to be changed in Table 4-1 and Table 11-6. According to Modification Traveler procedure, TFC-ENG-DESIGN-C-56, Section 4.5: "Identify open items and recommended actions with a PER or a project schedule commitment." Therefore, this PER will be used to track the required revision.
4/24/2018	WRPS-PER-2018-1059	Heise Pressure Module, Model #HM2-2, Serial # HM2-62997	Heise Pressure Module, Model #HM2-2, Serial # HM2-62997 (M&TE #817-13-01-025E) "As Found" reading during calibration was Out-Of-Tolerance. It was adjusted to manufacturer spec.
4/24/2018	WRPS-PER-2018-1060	Heise Pressure Module, Model#HM2-2	Heise Pressure Module, Model#HM2-2, Serial # HM2-64192 (M&TE# 817-13-01-025F) "As Found" reading during calibration was Out-Of-Tolerance. It was adjusted to manufacturer spec.

4/24/2018	WRPS-PER-2018-1061	Heise Pressure Module	Heise Pressure Module, Model# HM2-2, Serial# HM2-64191 (M&TE# 817-13-01-025G) "As Found" reading during calibration was Out-Of-Tolerance. It was adjusted to manufacturer spec.
4/24/2018	WRPS-PER-2018-1062	ETF Control room MCS	ETF Control Room MCS System: We had a repeat of Stale Data & HMI remote control issue that started today (04/24/18 645am-ish) – we're seen this same issue on 03/21/18 & 04/09/18. About 2 weeks apart from each event. The ETF ICS is rectified and operating. PER issued to document re-occurrence of MCS Issues. If this occurs when ETF is Operating we will be forced into an unplanned shutdown.
4/24/2018	WRPS-PER-2018-1065	AP Farm Engineer evaluation	While performing internal document review it was noticed Assumption 3 (in Section 4.0) is based on activities that will occur during commissioning. Assumption 3 states "The sample drawn through the sample probe is assumed to be representative of the exhaust gas... this will be verified as part of commissioning.". For unverified assumptions TFC-ENG-DESIGN-C-10 , item 5 in Attachment A calls out the use of TBD or HOLD notation, to be controlled in accordance with TFC-ENG-DESIGN-C-25. WRPS-HOLD-2018-57886 was generated for the verification activities in Assumption 3.

4/24/2018	WRPS-PER-2018-1066	AP Farm CAT	While performing internal document review it was noticed the Basis of Assumption 4 (in Section 4.0) included a "Section TBD" of the Construction Acceptance Test to verify the sample system has no leaks and that periodic testing will occur. In accordance with TFC-ENG-DESIGN-C-25 WRPS-TBD-2018-58002 was generated for the verification activities and periodic testing in Assumption 4.
4/24/2018	WRPS-PER-2018-1064	Incident in 222-S Counting Room not timely reported	At 1500, on 4/19/18, the 222-S FOM was notified that an incident occurred at 0930 on 4/19/18 where a (b)(6) exited the 222-S Counting Room RBA/RMA boundary without performing the required exit survey, see WRPS-PER-2018-1011. The FOM was notified by (b)(6) during the 222-S Plan of the Day meeting at 1500. During the investigation the FOM asked (b)(6) why there was a delay with informing (b)(6) of the incident and was told, "Waited to talk to 222-S RadCon manager." Additionally, the FOM asked (b)(6) (at the time of this incident) when they informed (b)(6) **, and was told they waited an hour because they were not sure who to notify.** Informing the FOM is clearly defined in our Conduct of Operations procedures. As stated in ATS-310, Section 11.2, Rev E-0, Section 3.1 Operations Management, Maintains authority and accountability for all facility operations. Reference documentation also directs employees, "Operators and support staff will promptly **notify operations management of all changes in status, abnormalities, or difficulties encountered in performing assigned tasks. DOE O 422.1, Attachment 2, 2.b(1).a and b."** **The delay with providing the FOM information about the facility, equipment and the people, hinders their ability to make decisions and timely reporting requirements.**
4/24/2018	WRPS-PER-2018-1067	RSRs did not contain sufficient detail to be meaningful	During performance of cause analysis for WRP-PER-2018-0690, it was noted that an extraneous condition not related to the cause exists. Multiple Tank Farm Projects Radiological Survey Reports (RSR's) were documented where survey measurements of equipment that was conditionally released and shipped were not **documented, and sufficient detail was not included in the RSR to note that surveys were performed.** **TFC-ESHQ-RP_ADM-P-09, REV E-8 requires that:** The RSR shall contain sufficient detail to be meaningful after the originator is no longer available

4/24/2018	WRPS-PER-2018-1068	A Farmgarbage containers	At the new A-Farm Ingress and Egress buildings, they furnished square garbage receptacles that are too wide to accept the current plastic bags we use. The bags must be stretched over the tight corner which could cause someone to strain their shoulder and/or arm trying to get it stretched over the corner. The bags also tear at times when stretched. This seems to be counterintuitive.
4/24/2018	WRPS-PER-2018-1032	Level reading at catch tank 241-A302B	Level reading at catch tank 241-A302B using new manual tape assembly installed under Work Order #374310 was a liquid level of 39.75" on 4/23/18. Previous good reading of old manual tape was 48.5" on 4/24/17. 3rd quarter 2017 reading was not obtained due to assumed failure of the old manual tape, see WRPS-PER-2017-0581. Recovery Action Plan OSD-RAP-60403, Rev. 0, was created to follow replacement of the old manual tape. Inspection at removal of the old manual tape revealed the plummet was still attached. The 241-A302B tank level appears to have dropped from 48.5" to 39.75" sometime after the 2nd quarter 2017 reading.
4/24/2018	WRPS-PER-2018-1072	Rusted Cylinder in 222-S Room 2B2	An imminent safety concern was elevated to me for disposition. When reviewing pictures it is apparent the severity of concern and a stop work was invoked by me informing 2225 facility manager to take an immediate action until a more formal evaluation can be completed by lab management. The integrity of an in service compressed gas bottle (content unknown from pictures) has degraded to point it may have a catastrophic failure injuring personnel or causing facility damage.

4/24/2018	WRPS-PER-2018-1073	Rusted Cylinder in 222-S Room 2B2	WRPS employee reported a safety concern with a rusty/corroded high purity Argon gas bottle in Room 2B2 to 222-S HAMTC Safety Rep who initiated a Stop Work to 222-S management.
4/24/2018	WRPS-PER-2018-1074	TFC-ESHQ-ENV_PP-C-19 does not appear to address:	A review of the conditions contained in State Waste Discharge Permit ST0004502 for the 200 Area Treated Effluent Disposal Facility (TEDF) was performed to confirm that procedures and practices were in place to comply with the conditions of the permit. Conditions from ST4502 were entered into a matrix along with an evaluation of the implementing process and documentation needed to abide by the condition. That matrix was documented in WRPS-MOP-2018-0871 (attached). The evaluation found observations in the implementing documentation that should be evaluated. These observations are: TFC-ESHQ-ENV_PP-C-19 "State Waste Discharge Permits ST4500 and ST4502" does not appear to address: - Reporting of alternate analytical procedures as required in ST4502 S2.A - Calculation methodology for average value (monthly average) as stated in ST4502 S2.A - Submitting Engineering reports, plans and specifications at least 180 days prior to start of construction G.5
4/24/2018	WRPS-PER-2018-1075	RPP-PLAN-60723does not appear to define Quarterly as defined in ST4502 S2.A	A review of the conditions contained in State Waste Discharge Permit ST0004502 for the 200 Area Treated Effluent Disposal Facility (TEDF) was performed to confirm that procedures and practices were in place to comply with the conditions of the permit. Conditions from ST4502 were entered into a matrix along with an evaluation of the implementing process and documentation needed to abide by the condition. That matrix was documented in WRPS-MOP-2018-0871 (attached). The evaluation found: RPP-PLAN-60723 "Sampling and Analysis Plan for the Effluent Treatment Facility, Liquid Effluent Retention Facility and Treated Effluent Disposal Facility does not appear to define Quarterly as defined in ST4502 S2.A

4/25/2018	WRPS-PER-2018-1076	ETF contamination bird egg shell	During the performance of a Scheduled Radiation Survey Task Description (LE-D012) at ETF, contaminated bird feces and egg shells were discovered. Total Contamination of; Surge Berm (Radiological Buffer Area): Location # 1 (Bird Feces): 16,710 dpm/100 cm2 Beta-Gamma and <500 dpm/100 cm2 Alpha, Facility Roadway South of Surge Berm (Non-Rad Area): Location # 2 (Egg shells): 126,580 dpm/100 cm2 Beta-Gamma and <500 dpm/100 cm2 Alpha No removable contamination was detected. The locations were deconned. Survey results are documented in Survey Simple on survey # LE-1800803
4/25/2018	WRPS-PER-2018-1077	OFI QA Grp Training	FY2018-ESHQ-MD-0368– Quality Assurance SMP, identified an opportunity for improvement to enhance the technical training, the development of desktop guides, and a concern regarding the effectiveness of past corrective actions related to the submittal of Work Packages to the Quality Assurance Engineers (QAE).
4/25/2018	WRPS-PER-2018-1078	improvement on plexi-glass/glovebag.	It was identified during in process ALARA review that an improvement is needed for the updated plexi-glass/glovebag retrieval device used for waste sampling. During sampling at AY-101, it was noted that a seam on the plexiglass retrieval device likely leaked, causing a small amount of waste to leak, resulting in AOP-11 on 4/20/18.

4/25/2018	WRPS-PER-2018-1079	SX Farm request to close breather filter for work activity	A proposal has been made to isolate breather filters in SX Farm while the barrier is being installed to reduce the potential for tank vapors in the worker breathing zones. Isolating breather filters was tried in BY Farm in 2003 and vapor incidences increased rather than decreased. The tanks are not designed to be airtight so closing breather filter isolation valves can increase fugitive emissions (see attachment 1). A Lessons Learned Information Bulletin (IB-04-13) on the BY Farm experience was written to communicate the need to consider conservative industrial hygiene monitoring and control strategies when there is a potential to increase vapor exposures to personnel (see attachment 2). The PER associated with the BY Filter closure was PER-2003-4559.
4/25/2018	WRPS-PER-2018-1070	Cause analysis for WRP-PER-2018-0690 AP-06A	While performing cause analysis for WRPS-PER-2018-0690, an HPI error precursor was noted. Work instructions for the AP-06A demobilization gave allowances to decontaminate, paint, or wrap items, but did not go into additional detail about disposition or shipping requirements for equipment that was planned to be reused. Decisions on how to disposition equipment during demobilization were made in the field by the work team. It is possible that this may have had an indirect effect of perceived time/schedule pressure, (Task Demands: 1A), on (b)(6) less diligently. This does not alleviate the responsibility of (b)(6) is performed, however, shipping Radioactive Material unpackaged increases the risk of conditionally releasing an item with removable activity on accessible areas, and having planned and readily available shipping paperwork in the work package might have elevated pressure in the field.
4/25/2018	WRPS-PER-2018-1069	ETF DrillsEP program	On March 13, 2018 WRPS Security and Emergency Services (SES) conducted an emergency preparedness drill to evaluate emergency response actions involving a suspicious object event that impacted the Effluent Treatment Facility (ETF). During the course of the drill the evaluation team identified the following Suggestion which pertains to EP-Program Element 3, Training and Drills. Both procedures utilized during this drill need to be updated to improve protective actions and response actions. The placement of PAX announcements in these procedures need to reviewed; moving this action closer to the beginning of procedure may be needed. Language regarding emergency response organization (ERO) actions may need to be included in the example PAX announcement within these procedures. This will simplify updates to the message being made by the BW/BED during an event. Procedures utilized: Security Events at ETF, ETF-ERP-85B-009 and Evacuation at ETF, ETF-ERP-85B-008. (P/E 3.19) Drills

4/25/2018	WRPS-PER-2018-1080	ETF temporary mod	Pressure gages are installed at service air connections in the decomposer system that are not reflected on the P&ID nor is there a temporary modification. It appears from talking to experienced operators the gages are a legacy item from previous operation of the system. Currently the decomposers are bypassed. The two connections are service air connection downstream of valve 60D-423 and 600-411. The subject P&ID is H-2-89332, H2O@ Decomposer system. This issue was discussed with the congnizant ETF engineer.
4/25/2018	WRPS-PER-2018-1081	242-A TSR Functional Test Process Deficiencies	Title: Observed the Performance of TSR Functional Testing at 242-A (Including Backshift) Summary: On April 19, 2018, Technical Safety Requirement functional tests were performed at 242-A per TO-600-070; Perform Evaporator Operability Functional Tests. I observed the Pre-Job Briefing and work in the field. Overall there was good compliance with Conops principles, with a couple of anomalies noted in the Finding and Observation for Improvement attached to this report. --- Issue Type: Finding (Level 3) Significance Level: 1 Statement: 36234-TF-F01 - 242-A TSR Functional Test Process Deficiencies (Ciola, April 19, 2018) Discussion: On April 19, 2018, Technical Safety Requirement functional tests were performed at 242-A per TO-600-070;Perform Evaporator Operability Functional Tests. The test collects time-sensitive data at multiple locations including the control room and two other locations at the facility. The procedure requires revision. Section 5.4.9.1 states, "OPEN drain valves 242-AE-IA-V-003 and 242-AE-IA-V- 011 sequentially". However, apparently due to the time-sensitive nature of the process the valves were opened concurrently vs. sequentially. Section 5.4.9.2 states, "BLOWDOWN line for 10 to 15 seconds", while Section 5.4.9.3 states, "IF water was observed coming out of the drain leg after 15 seconds NOTIFY Engineering", therefore, the valve should remain open for at least 15 seconds. Also, there should be an action step to "OBSERVE the drain leg" if this is criteria of the test.
4/25/2018	WRPS-PER-2018-1082	Recommendations for Briefings of More Technical Data Collection Activities	Title: Observed the Performance of TSR Functional Testing at 242-A (Including Backshift) Summary: On April 19, 2018, Technical Safety Requirement functional tests were performed at 242-A per TO-600-070; Perform Evaporator Operability Functional Tests. I observed the Pre-Job Briefing and work in the field. Overall there was good compliance with Conops principles, with a couple of anomalies noted in the Finding and Observation for Improvement attached to this report. --- Issue Type: OFI (Opportunity for Improvement) Significance Level: 1 Statement: 36234-TF-O01 - Recommendations for Briefings of More Technical Data Collection Activities (Ciola, April 19, 2018) Discussion: On April 19, 2018, Technical Safety Requirement functional tests were performed at 242-A per TO-600-070; Perform Evaporator Operability Functional Tests. The test collects time-sensitive data at multiple locations including the control room and two other locations at the facility. The last time this procedure was performed was in June of 2018. See OA 34285 for details of oversight of that activity. Due to the infrequent performance of this test and the time-sensitive nature of the data collection activities, there was much preparation and discussion on the performance of the procedure before and during the Pre-Job Briefing. Based on the number of questions that were presented by the crew on exactly what data was to be recorded and when, the briefings would be better served using the completed data sheets from the last performance of the test, assuming the data collection requirements have not changed. REF: TOD Weekly 4-16-18; R Ciola; OFI; OA36234

4/25/2018	WRPS-PER-2018-1083	All tank farms toured had material and equipment adrift and severe buildup of tumbleweeds	Title: 18018-TOD Assessment of Housekeeping in Tank Farms and Associated Facilities Scope: The scope of this assessment was to evaluate the housekeeping practices in the Tank Farms, 242-A Evaporator, and the 222-S Laboratory and to assess compliance with the requirements listed below. Requirement(s) Not Met: 29 CFR 1910.176 Handling materials - general (c) Housekeeping. Storage areas shall be kept free from accumulation of materials that constitute hazards from tripping, fire, explosion, or pest harborage. Vegetation control will be exercised when necessary. 29 CFR 1926.252 Materials Handling, Storage, Use and Disposal (c) All scrap lumber, waste material, and rubbish shall be removed from the immediate work area as the work progresses. TFC-ESHQ-S-STD-27, Rev A-5, Attachment B, "Housekeeping/Sanitation" . All scrap lumber, waste material, and rubbish shall be removed from the immediate work area as the work progresses. TFC-ESHQ-S-STD-05, REV B-8, "Walking and Working Surfaces", Section 3.1, General Requirements ---------- Issue Type: Finding (Level 3) Significance Level: 1 Statement: 18018-TOD-F01 – All tank farms toured had material and equipment adrift and severe buildup of tumbleweeds at the fence lines creating tripping hazards and potential fire hazard and pest harborage. (Priority Level 3, Swarens) Discussion: Tours of B, BY, BX, T, U AN, and AP farms resulted in identification of material and equipment adrift as well as severe accumulation of tumbleweeds along fence lines. These conditions create tripping hazards and potential fire hazard and pest harborage. Requirements: 29 CFR 1910.176 Handling materials - general (c) Housekeeping. Storage areas shall be kept free from accumulation of materials that constitute hazards from tripping, fire, explosion, or pest harborage. Vegetation control will be exercised when necessary. 29 CFR 1926.252 Materials Handling, Storage, Use and Disposal (c) All scrap lumber, waste material, and rubbish shall be removed from the immediate work area as the work progresses. TFC-ESHQ-S-STD-27, Rev A-5, Attachment B, "Housekeeping/Sanitation" 3. All scrap lumber, waste material, and rubbish shall be removed from the immediate work area as the work progresses. TFC-ESHQ-S-STD-05, REV B-8, "Walking and Working Surfaces", Section 3.1, General Requirements
4/25/2018	WRPS-PER-2018-0943	Ecology Inspection Letter 18-NWP-056: August 2017 RCRA inspection of 242-A	Ecology Inspection Letter 18-NWP-056: August 2017 RCRA inspection of 242-A Ecology's letter the following as Concern #2: "Although the fire water A-FP-1 fire system valve is not directly related to 242-A Evaporator tank system, there should have been documentation of a scheduled repair or remedial action to be taken. If A-FP-1 fire system valve is associated with emergency equipment (e.g. fire extinguishing system) a remedial action should have been taken during the approximately 20 days the while the deficiency continued or documented to be on a schedule for repair or remedial action."
4/25/2018	WRPS-PER-2018-1086	TFC-BSM-HR_AT-C-03	TFC-BSM-HR_AT-C-03, Personal Time Bank and Other Absences, requirements for bereavement leave are unclear and the wording is inconsistent with other Hanford Site contractor procedures. The intent of the procedure is that brothers-in-law and sisters-in law are only allowed if they are the employee's spouse's brother or sister. Please clarify the procedure by removing from the listing of immediate family members brothers-in-law and sisters-in-law and replace these with spouse's brother and spouse's sister. The confusing clarifying exclusions could then also be deleted.

4/25/2018	WRPS-PER-2018-1087	Items received at 227-S that are missing or with no packing information	Chemical standards required for new instrument acceptance testing not found. While obtaining information to support the installation planning for the new GCXGC High Resolution Time of Flight Mass Spectrometer (referred to as BenchTOF) [contract # 64314], I realized the box of acceptance test standards was missing. Procurement indicates this box was received on-site and delivered to 222-S; however, the chemicals are not entered into the Chemical Inventory Tracking System. The 15+ boxes delivered for CO # 64314 have been extensively searched, as has the 227-S storehouse. The vendor indicated the standards were shipped separately from the rest of the instrument components. Note that these are highly specialized chemicals for testing the equipment that were shipped from the United Kingdom. One unmarked, open box with no identification labels was found in 227-S (not with the boxes for CO # 64314) that contains one of the six standards the vendor states were shipped, plus another instrument test standard (which is not on the vendor's list). There is a plastic sleeve for documents...but it is empty. There is no packing slip to determine if the other standards were removed. See two photos of box exterior and one photo of the contents attached. Note that Safety Data Sheets were included for the two materials in the box. These materials are needed to test the operation of the instrument to ensure the instrument is functioning properly. The install cannot be completed without these materials.
4/25/2018	WRPS-PER-2018-1088	TFC-ESHQ-RP_MON-C-24	Procedure TFC-ESHQ-RP_MON-C-24, Sealed Radioactive Source Accountability and Control, Section 4.16, Step 4 allows the use of an Internal Memo to document the reason(s) for sealed radioactive source inventory and accountable sealed radioactive source leak test exemption, and for describing how access to an area containing a source that is exempted from inventory or leak testing is restricted and controlled. However, this memo is not included in Section 6 as a radiological record.
4/25/2018	WRPS-PER-2018-1084	ETF Radiological Records Assessment	During the annual Radiological Records Assessment it was found that the RSA located at ETF had records stored in it that were older than one year. This violates TFC-BSM-IRM_DC-C-02, "Records Management". This was brought up with the RSA holder in question, and steps are being taken to get these records submitted to IDMS and then shipped off to long term storage.

4/25/2018	WRPS-PER-2018-1089	Berm maintenance	A section of the 600-269PL transfer line berm is overgrown with vegetation and shows signs of animal intrusion. See RSR BOS-180444.
4/25/2018	WRPS-PER-2018-1090	sun shields	Our mask stations have run out of tinted sun shields for our respiratory protection equipment. We have been told that we will not get any until July from the purchaser due to them being on backorder. In an email today, our company President states, wear your sunscreen and sunglasses! We do not have the proper safety equipment to do our jobs safely, and we should look elsewhere to get these tinted sun shields.
4/25/2018	WRPS-PER-2018-1048	TF-18-QSR-099 4	During the further evaluation of PER 2017-2845, several observations and recommendations were made that extended beyond the scope of that PER. Those observations and recommendations were captured in Quality Surveillance Report TF-18-QSR-099 and found attached to the PER. This PER addresses Recommendation #4 of 5 in that QA report.

4/25/2018	WRPS-PER-2018-1047	TF-18-QSR-099 3	During the further evaluation of PER 2017-2845, several observations and recommendations were made that extended beyond the scope of that PER. Those observations and recommendations were captured in Quality Surveillance Report TF-18-QSR-099 and found attached to the PER. This PER addresses Recommendation #3 of 5 in that QA report.
4/25/2018	WRPS-PER-2018-1046	TF-18-QSR-099 2	During the further evaluation of PER 2017-2845, several observations and recommendations were made that extended beyond the scope of that PER. Those observations and recommendations were captured in Quality Surveillance Report TF-18-QSR-099 and found attached to the PER. This PER addresses Recommendation #2 of 5 in that QA report..
4/25/2018	WRPS-PER-2018-1049	TF-18-QSR-099	During the further evaluation of PER 2017-2845, several observations and recommendations were made that extended beyond the scope of that PER. Those observations and recommendations were captured in Quality Surveillance Report TF-18-QSR-099 and found attached to the PER. This PER addresses Recommendation # 5 of 5 in that QA report.

4/26/2018	WRPS-PER-2018-1091	Alignment Discrepancies between TFC-PLN-147 and TFC-BSM-CP_CPR-P-04 for Invoice Approval	Title: Alignment Discrepancies between TFC-PLN-147 and TFC-BSM-CP_CPR-P-04 for Invoice Approval Problem Description: An alignment discrepancy exists between TFC-PLN-147, Project Controls System Description, and TFC-BSM-CP_CPR-P-04, Subcontract Administration. An issue with an invoice that was not approved by the Cost Account Manager (CAM) as specified in TFC-PLN-147 was identified and documented in WRPS-PER-2018-0021. The PER was categorized as TUF in which the deficient condition was corrected (approval obtained) and the PER closed in accordance with TFC-ESHQ-Q_C-C-01, Problem Evaluation Request. However, the alignment issue still needs to be addressed. TFC-BSM-CP_CPR-P-04 does not include CAM approval of invoices as specified in TFC-PLN-147 as shown below. - TFC-BSM-CP_CPR-P-04 states, "Invoices will be processed (routed) through Asset Suit and approved for payment by the BTR, Procurement, Procurement Specialist, and Finance (Accounts Payable)." - TFC-PLN-147 states, "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." A review of the source requirements did not indicate specific invoice approval requirements. The absence of this level of specificity allows WRPS to define the invoice approval methodology. Thus, the initial condition described in WRPS-PER-2018-0021 did not constitute a non-compliance with source requirements. However, the implementing procedures need to be in alignment to avoid confusion and help ensure appropriate levels of approval occur. Source Requirements Reviewed - 08-5085-FVS, 2010, Consent Decree, United States District Court, Eastern District of Washington. - 48 CFR 970-44, "Management and Operating Contractor Purchasing" - DE-AC27-08RV14800, 2008, "Tank Operations Contract," U.S. Department of Energy, Office of River Protection, Richland, Washington. - DID 81861 (DOE Version), 2015, "Integrated Program Management Report," U.S. Department of Energy, Washington, D.C. - Earned Value Management System Interpretation Handbook 2.0, U.S. Department of Energy, Washington D.C.
4/26/2018	WRPS-PER-2018-1092	AP Farm chg trlr steps	AP change trailer stairs are tagged out of service because the bottom step is out of compliance. The bottom step on both set of stairs is too short.
4/26/2018	WRPS-PER-2018-1093	Requirements of 29 CFR 1910.176 are not included in prescribed WRPS documents	Title: 18018-TOD Assessment of Housekeeping in Tank Farms and Associated Facilities Scope: The scope of this assessment was to evaluate the housekeeping practices in the Tank Farms, 242-A Evaporator, and the 222-S Laboratory and to assess compliance with the requirements listed below. Requirement(s) Not Met: 29 CFR 1910.176 Handling materials - general (c) Housekeeping. Storage areas shall be kept free from accumulation of materials that constitute hazards from tripping, fire, explosion, or pest harborage. Vegetation control will be exercised when necessary. 29 CFR 1926.252 Materials Handling, Storage, Use and Disposal (c) All scrap lumber, waste material, and rubbish shall be removed from the immediate work area as the work progresses. TFC-ESHQ-S-STD-27, Rev A-5, Attachment B, "Housekeeping/Sanitation" . All scrap lumber, waste material, and rubbish shall be removed from the immediate work area as the work progresses. TFC-ESHQ-S-STD-05, REV B-8, "Walking and Working Surfaces", Section 3.1, General Requirements --- Issue Type: Finding (Level 3) Significance Level: 1 Statement: 18018-TF-F02 – Requirements of 29 CFR 1910.176 are not included in prescribed WRPS documents. (Priority Level 3, Swarens) Discussion: TFC-ESHQ-S_SAF-CD-11, REV B, "Worker Safety and Health Program Requirements Matrix" indicates requirements of 29 CFR 1910.176 are included in TFC-ESHQ-S-STD-05, REV B-8, "Walking and Working Surfaces" and TFC-ESHQ-S-STD-27, Rev A-5, Attachment B, "Housekeeping/Sanitation". Review of these documents failed to find the requirements in the standards sections or in the requirements section. Requirements: 29 CFR 1910.176 Handling materials - general (c) Housekeeping. Storage areas shall be kept free from accumulation of materials that constitute hazards from tripping, fire, explosion, or pest harborage. Vegetation control will be exercised when necessary. REF: TOD Weekly 4-16-18; C Swarens; Level 3 Finding; OA36174

4/26/2018	WRPS-PER-2018-1094	AN Farm Components are Not Labeled in Accordance with TFC-ENG-STD-12, "Tank Farm	Title: IOS 18018 - Housekeeping - Performed Housekeeping Tour of AN Farm Summary: Performed a housekeeping tour of AN farm, inspecting for general cleanliness and organization. During the tour several incidents of gear adrift were found including: several transit tripods, a shovel, electrical cords, cord protectors, a empty 55 gallon drum, wood dunnage, portable stairs, saw horses, shielding blankets, and other assorted equipment, tools, and trash. Additionally it was discovered many labels were missing from components requiring labeling in accordance with TFC-ENG-STD-12, "Tank Farm Equipment Identification Numbering and Labeling Standard". Discussions with the AN Operations Manager indicated that he felt much of the equipment not currently labeled in AN farm may not require labeling. Items identified by the FRs conducting the tour as not having labels are items listed in TFC-ENGSTD-12. TFC-ENG-STD-12 lists the following: "The following components shall be labeled: (5.1.1, 5.1.2) • 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."
4/26/2018	WRPS-PER-2018-1095	242-A Slurry Sampling Procedure Deficiencies	Title: Observed the Performance of Slurry Sampling at 242-A Summary: The FR attended the Pre-Job Brief, which was well attended and presented. The FR observed work in the field, obtaining samples and shipping them to 222-S. The work went well. There were some deficiencies in the procedure which are contained in the attached Finding. --- Issue Type: Finding (Level 3) Significance Level: 1 Statement: 36244-TF-F01 - 242-A Slurry Sampling Procedure Deficiencies (Ciola, April 23, 2018) Discussion: On April 23, 2018, 242-A Operations performed TO-630-001; Obtain 242-A Slurry Samples (Rev 0-5). Changes to the procedure are warranted. Work steps are ambiguous, lacking unique identifiers with an example at step . Some steps add no value: 5.8.10 ENSURE Feed and Slurry Sample Leak Detectors are not in alarm. 5.8.10.1 IF Feed and Slurry Sample Leak Detectors are in alarm, CHECK with Control Room Operator AND CONTINUE Some steps are open ended, as in these steps that fail to instruct the operator on what to do if the leak detectors have not cleared. 5.9.13 ENSURE Feed and Slurry Sample Leak Detectors have been cleared. 5.9.14 Close valve RWV-11 (Figure 1) These steps were performed in parallel with other previous steps, which does prevent exposure in line with As Low As Reasonably Achievable tenets.
4/26/2018	WRPS-PER-2018-1096	Weekly surveillance A Complex Contamination Area Perimeter	While performing weekly surveillance COO-W040 "A Complex Contamination Area Perimeter Survey", 20,000 dpm/100 cm2 Beta/Gamma and no Alpha was found with a GM outside of a posted Contamination Area. Area of concern was guarded by one HPT while the other made notifications to RCS. Two HPT's and one Laborer donning two sets of gloves and scooped out what looked to be wildlife feces into a rad bag until no further contamination could be found. Bag was taped and disposed of. No further action is needed. MM

4/26/2018	WRPS-PER-2018-1071	SX Farm routine surveillances frequency	Missed Radiological Routine Surveillances in SX Farm. During a walk down of the SX Farm change trailer by the RadCon Special Projects Manager, a question arose as to the correct frequency of routine radiological surveillance being performed for the SX Farm. This farm has long been considered an inactive single-shell tank farm, since the only work being conducted was routine rounds, surveillances, and other non-intrusive work with minimal potential for causing a change in radiological conditions. In accordance with procedure TFP-RC_MON-P-10, "Required Radiological Surveillances", Attachment A, radiation and contamination surveys are to be performed weekly in all routinely occupied RBA and CA tank farms, with the exception for areas located within inactive SST Farms, where these surveillances should be performed monthly rather than weekly. "Inactive Single-Shell Tank Farm" is defined in Section 5.0 of the MON-P-10 procedure as: "A Single-Shell Tank Farm where radiological conditions are sufficiently stable that the likelihood of changing radiological conditions caused by work performed in the farm is very low (No waste intrusive work, opening of systems, or tank waste transfers occur between scheduled surveillances)." Observation of the SX change trailer status board (and follow-up investigation of the Survey Simple database) determined that the last routine surveillance of SX Farm was conducted on 4/3/18 - three weeks prior to the date of discovery. Significant construction work has been ongoing in SX farm since the beginning of April, including digging numerous 2 foot deep holes in the farm. In accordance with the definition provided above, SX has not been an inactive SST Farm since the beginning of the month (since work with the potential to change radiological conditions in the farm has been ongoing), and at least two required weekly surveillances of the farm have been missed. Conversations were held with the Production Operations, Routine Surveillance, and acting Tank Farm Projects (TFP) RadCon Managers as well as the ST Team First Line RadCon Manager. It was determined that the daily change trailer/step off pad surveillances were properly completed by the ST Team shift HPTs, and job coverage surveys were completed by the TFP HPT's. The procedural steps for communicating and executing a transfer of responsibility for routine surveillance do not appear to have been followed. The Routine Surveillance RadCon Manager nor his First-Line Managers were not notified of the change in conditions for SX Farm, and had continued conducting monthly routine surveillances based on the farm having inactive status.
4/26/2018	WRPS-PER-2018-1098	Hastings Mass Flowmeter control valvesconfiguration	Spare Hastings flow controls valves were found to have the wrong setpoint input configuration. We received 4-20mA input configuration when we specified a 0-5V input configuration. There is no indication of the input configuration on the flow control valve or with the documentation provided other than the part number which specifies the input configuration. The issue was not identified until the control valves were taken to the instrument shop for calibration. Two valves are known to have the wrong configuration both of which have a CATID of 623246. Serial Number: 0316045001 Serial Number: 0316045002 Multiple other valves exist in the warehouse under CATIDs 658323 and 623246 and should be considered suspect of the same condition. All spare valves should be checked for input configuration and returned to Hastings for correction or at least removed from the spares stock. Hastings has no way to verify the input configuration of the control valves that were shipped to us. The Hastings calibration datasheets do not specify input signal. Hastings recommends we test each individual valve to see if they accept a voltage input. This situation also occurred less than a year ago. All of the appropriate QA clauses are associated with the purchase order, however Hastings still sent us the wrong configuration. We need to determine a way to avoid this situation in the future. These Hastings flow control valves are considered a single point failure for each DST VTP exhauster. See attached email for additional information.
4/26/2018	WRPS-PER-2018-1097	SX Change Trailer is inadequate	The SX Change Trailer is inadequate for the current work load in the Farm. With the crew size planned to excavate in the farm the facility will not support the necessary change out of SCBA Bottles for the worker. This puts the worker's Safety at Risk.

4/26/2018	WRPS-PER-2018-0935	Vapor Monitoring and Detection System 3	A test requirements exception was identified during preparation of the Vapor Monitoring and Detection System (VMDS)Phase II Test Results report for the OP-FTIR, 241AP-TRR-064. The test requirements matrix for VMDS testing on the OP-FTIR states to collect one set of nitrous oxide data and one set of 200 ppm ammonia data during performance the zero and span calibration check. Nitrous oxide test gas and 200 ppm ammonia test gas were not available prior to suspension of testing. A 10 ppm ammonia test gas was used to perform the calibration check, results showed that the 10 ppm test gas was below the minimum detection limit of the OP-FTIR. If the OP-FTIR is determined necessary for vapor monitoring additional testing will be necessary.
4/26/2018	WRPS-PER-2018-0938	Vapor Monitoring and Detection System 2	A test requirements exception was identified during preparation of the Vapor Monitoring and Detection System (VMDS)Phase II Test Results report for the Coastal Meteorological Tower, 241AP-TRR-070. The test requirements matrix for VMDS testing on the Met Tower states to track reliability of the instrument. Testing was not initiated due to installed sensors being out of calibration. If the tower is determined necessary for vapor monitoring additional testing will be necessary.
4/26/2018	WRPS-PER-2018-1043	Vapor Monitoring and Detection System	A test requirements exception was identified during preparation of the Vapor Monitoring and Detection System (VMDS)Phase II Test Results Report for the UV-DOAS, 241A-TRR-063. The test requirements matrix for VMDS testing on the UV-DOAS states to collect one set of nitrous oxide data and one set of 200 ppm ammonia data during performance of the zero and span calibration check. The UV-DOAS does not detect nitrous oxide, inclusion of nitrous oxide in the UV-DOAS test requirements matrix was an error not caught during cross discipline review. 200 ppm ammonia test gas was not available prior to suspension of testing. A 10 ppm ammonia test gas was used to perform the calibration check and is documented in 241A-TRR-063. If the UV-DOAS is determined necessary for vapor monitoring additional testing will be necessary.

4/27/2018	WRPS-PER-2018-1099	SOV-60B-051 Fine Filter air fill valve will not open properly	SOV-60B-051 Fine Filter air fill valve will not open properly (sticks) to buildup air pressure during nightly Fine Filter backwashes.
4/28/2018	WRPS-PER-2018-1100	Leak Detector alarm sounded in AP-03A pump pit during evaporator campaign.	Leak Detector alarm sounded in AP-03A pump pit during evaporator campaign.
4/28/2018	WRPS-PER-2018-1101	All RORO container covers collect rain.	All RORO container covers collect rain. Waste of time to remove rain water.

4/29/2018	WRPS-PER-2018-1102	ETF Thin Film Dryer Unplanned Shut Down	While attempting to flush TFD line and eventually check drum powder level, the TFD went to SHUTDOWN unexpectedly. Further investigation is that AOV-60J-155 would not close. The TFD rotor was placed in manual and restarted. The steam was reduced to 10%. We tried several times to open and close AOV-60J-155 and could not get it to close. The unexpected shutdown occurred at 1427 hrs. CSO and Management was notified of unexpected shutdown.
4/30/2018	WRPS-PER-2018-1103	Unplanned shut down of ETF RCA Ventilation and Vessel Off-Gas systems due to loss of air compressor.	Lost Compressed Air Supply to 2025E Systems. At 0315 CRO was notified by Refueling Truck Driver that the Compressor was off. CRO noted that plant air pressure was dropping off quickly. Lost RCA Ventilation System and Vessel Off Gas System.
4/30/2018	WRPS-PER-2018-1104	During the performance of a Scheduled Radiation Survey Task Description (LE-D012) at ETF, contaminated bird feces was discove	During the performance of a Scheduled Radiation Survey Task Description (LE-D012) at ETF, contaminated bird feces was discovered. Total Contamination of; West of 2025ED (Non-Rad Area): Location # 1: 54,470 dpm/100 cm2 Beta-Gamma and <500 dpm/100 cm2 Alpha No removable contamination was detected. The location was deconned. Survey results are documented in Survey Simple on survey # LE-1800835

4/30/2018	WRPS-PER-2018-1105	Exterior building lights at 2025ED "Load-in" facility have not worked for 5 years	Exterior building lights at 2025ED "Load-in" facility have not worked for 5 years. This has been recorded in Facility RATL since 2013
4/30/2018	WRPS-PER-2018-1106	RATL system at ETF Facility is not adequate for tracking maintenance and safety items	Current RATL system at ETF Facility is not adequate for tracking maintenance and safety items from discovery to repair/ completion. Some items have been on RATL log for over 10 years.
4/30/2018	WRPS-PER-2018-1111	Industrial Hygiene Management change control process	Current Industrial Hygiene Management change control process includes filtering procedure changes through a review team. The IH management has limited authorization to submit Procedure Work Request (PWR) to individuals within their Industrial Hygiene forum.

4/30/2018	WRPS-PER-2018-1112	Performed MBD reset per TFC-ENG-CHEM-D-44	Performed MBD reset per TFC-ENG-CHEM-D-44 for the evaporator campaign to AP-103 (EC-08). See completed Checklist 9 dated 4/28/2018 of TO-230-225_J-0.
4/30/2018	WRPS-PER-2018-1114	TFC-ENG-CHEM-D-21	TFC-ENG-CHEM-D-21 Process Engineering Waste Surveillance Data Review is based upon use of PCSACS. First quarter of 2018 data is being validated and verified (V&V) via PI Coresight data. This is not reflected in the current revision of the procedure. Training has been provided to V&V personnel as to how to accomplish the required V&V of data.
4/30/2018	WRPS-PER-2018-1113	Calibration stickers on 3 staplex air samplers	Calibration stickers on 3 staplex air samplers do not reflect the required information ((CFM) Flow-Rate per the Worksheet) per procedure 6-RM-718 Staplex High Volume Air Sampler Calibration section 5.1.49. These 3 staplex units had been calibrated and have not been used in the field.

4/30/2018	WRPS-PER-2018-1117	TFC-BSM-AC-C-02	Reviewing TFC-BSM-AC-C-02. A major revision was done last year to meet corrective actions. At the time, it was noted that parts of the procedure could be rewritten to better conform to the procedure format standard. An action should now be taken to revise the procedure to meet the format standard (TFC-BSM-AD-STD-05).
4/30/2018	WRPS-PER-2018-1118	Performed a review of all LDD and Property Disposal actions	Performed a review of all LDD and Property Disposal actions that were CLOSED in ESTARS between 10/1/17 and 4/28/18 to ensure that accountable property records in Sunflower Asset Mgmt System (SAMS) were updated appropriately based on the action. In addition, I reviewed and noted where the complete final document package was not attached to the CLOSED ESTARS action.I reviewed 183 individual ESTARS actions. Of the 183 actions, 28 actions had at least one accountable item and, of these, I found only one(1) instance where the action was CLOSED, but the SAMS record(s) had not been updated. Further investigation is needed to determine if these items were shipped on the action or if the action should have been CANCELLED. I also found one instance where item was CLOSED on Loss, Damaged, Destruction (LDD) report and was properly retired in SAMS, but was found and ESTARS was updated with comment, but item was not reactivated in SAMS.In review of the final document package attached to ESTARS, I found 21 instances where final documents were not attached and 8 instances where the incorrect final doc package was attached. While it is not a requirement to attach the final documents package to the CLOSED ESTARS action as long as the complete document package is submitted to IDMS records, it is a good practice and facilitates review. At a minimum, the 8 instances where incorrect docs were attached should be corrected and the 21 instances where final docs were not attached should be confirmed in IDMS.
4/30/2018	WRPS-PER-2018-1119	Respiratory Protection Issues and Concerns Forms	Upon review of Respiratory Protection Issues and Concerns Forms, it was noted that the backlog needed to be updated. Per management direction, all forms were signed by RPPA and dated with date of discovery, 4/26/18. No backdating was performed. TFC-ESHQ-S_IH-C-05 revision incorporates a process for regular maintenance of RPP backlog. Recommend Trend Only to Industrial Hygiene.

4/30/2018	WRPS-PER-2018-1107	Technology Maturation Management	Contrary to TFC-PRJ-TD-C-01, Technology Maturation Management, RPP-PLAN-57181, R2 Technology Maturation Plan (TMP) for the Low-Activity Waste Pretreatment System Project (T5L01), incorrectly states that high-level cost and schedule information are included in the report.
4/30/2018	WRPS-PER-2018-1120	Strobic Air Units	Upon receipt inspection at vendors facility it was found that the Strobic Air Units had received shipping/and or transportation damage.
4/30/2018	WRPS-PER-2018-1108	Identify and document a graded approach to the application of Technology Maturation to the Technology Management process.	OFI - Identify and document a graded approach to the application of Technology Maturation to the Technology Management process. It is the observation of the assessor that an Opportunity for Improvement (OFI) exists to encourage a graded approach to the application of Technology Maturation to the Technology Management process. Addressing the OFI would allow a "non-capital project" or "activity" to progress through the process of identifying CTEs and assigning TRLs to the benefit of the program without being encumbered by the full due diligence required for a CAP. Technology Management should incorporate graded elements of the Technology Maturation Program by updating TFC-PLN-90 and TFC-PRJ-TD-C-01 to allow for use of the Technology Maturation process at a level of rigor appropriate for an activity or program, vs. a CAP.

4/30/2018	WRPS-PER-2018-1109	Master Submittal Register (MSR) submittals for the NDE program	OFI - Master Submittal Register (MSR) submittals for the NDE program have not been submitted or uploaded into SmartPlant as stated in the MSR. A desk review was performed on three NDE projects. Requisition number 304987, Support to CTO, subcontract/release # 36437-241 was reviewed and according to the TOC Master Submittal Register for this project, currently all submittals have completed as scheduled in SmartPlant. Requisition number 292655, PNNL NDE Downselect, subcontract/release # 36437-211 was reviewed and according to SmartPlant all but three submittals could be verified against the TOC Master Submittal Register for this project. The three missing submittals are as listed: •36437-211-SUB-001 Draft Test Plan •36437-211-SUB-004 Draft Test Protocol •36437-211-SUB-009 Draft Requirements Document for the NDE Delivery System and Test Facility Requisition number 305477, PNNL NDE Downselect, subcontract/release # 36437-243 was reviewed and according to the TOC Master Submittal Register for this project, currently all submittals, except 36437-243-SUB-002, Conference Report, could not be verified in SmartPlant as being completed. An attempt was made to reach out to assigned contact regarding all unverified documents but was notified contact was on vacation
4/30/2018	WRPS-PER-2018-1110	desk review was performed of TFC-PROJ-TD-C-01	A desk review was performed of TFC-PROJ-TD-C-01, Technology Maturation Management, along with CTO personnel interviews. As with TFC-PLN-90, the assessment team identified that the process described within this procedure does not accurately reflect the work that is being performed by CTO personnel. It is a recommendation of the assessment team that the CTO organization review and update this procedure to accurately capture and reflect the work process that is being performed by CTO personnel.
4/30/2018	WRPS-PER-2018-1121	MBD reset	Performed MBD reset per TFC-ENG-CHEM-D-44 for evaporator campaign EC-08 to AP-103. See attached Checklist 9. This is a second Checklist 9 performing an MBD reset for this campaign for this weekend (Apr 28 to Apr30, 2018). Reference WRPS-PER-2018-1112 for previous Checklist 9.

4/30/2018	WRPS-PER-2018-0978	Self-Assess Find 1: 45 day goal not being met when EIR is rrequired on a RES PER	Washington River Protection Solutions LLC (WRPS), Corrective Action Management Group conducted a management-directed self-assessment to evaluate the adequacy, implementation, and effectiveness of the WRPS Corrective Action Program. The assessment team conducted in-depth data reviews, observed the performance of corrective action process functions, and held interviews with various stakeholders. Finding 1: The company timeliness goal of 45 days to complete a cause analysis when an Event Investigation Report is required is not being met as expected. Of those reviewed, the management expectation to complete the cause analysis was exceeded by an average of 35 days.
4/30/2018	WRPS-PER-2018-0979	Self-Assess Find 2: 45 day goal for SIG PERs not being met	Washington River Protection Solutions LLC (WRPS), Corrective Action Management Group conducted a management-directed self-assessment to evaluate the adequacy, implementation, and effectiveness of the WRPS Corrective Action Program. The assessment team conducted in-depth data reviews, observed the performance of corrective action process functions, and held interviews with various stakeholders. Finding 2: The WRPS goal of 45 days to complete a Significant PER review is not being met.
4/30/2018	WRPS-PER-2018-0980	Self-Assess Find 3: Success criteria for Performanc e Trend PERs	Washington River Protection Solutions LLC (WRPS), Corrective Action Management Group conducted a management-directed self-assessment to evaluate the adequacy, implementation, and effectiveness of the WRPS Corrective Action Program. The assessment team conducted in-depth data reviews, observed the performance of corrective action process functions, and held interviews with various stakeholders. Finding 3: Development of Effectiveness Review success criteria for trends is not consistently performed as required per TFC-ESHQ-Q_C-C-06. Based on interview with the Trending and CSR Program Coordinator, there have been several instances of missing success criteria and effectiveness review actions. Some of the success criteria is capture in the quarterly trend report, but per procedure is to be documented in the cause analysis report with a PER/E-STARS action created to track the completion of the review. Feedback received from cause analyst indicate insufficient clarity of expectations in the governing procedures and report templates. A review of the procedures (TFC-ESHQ-Q_C-C-06) and report templates confirmed the need for improved clarity.

4/30/2018	WRPS-PER-2018-0981	Self-Assess Find 4: Ineffective corrective actions not documented	Washington River Protection Solutions LLC (WRPS), Corrective Action Management Group conducted a management-directed self-assessment to evaluate the adequacy, implementation, and effectiveness of the WRPS Corrective Action Program. The assessment team conducted in-depth data reviews, observed the performance of corrective action process functions, and held interviews with various stakeholders. Finding 4: Contrary to the requirements in TFC-ESHQ-Q_C-C-01, when corrective actions have not been effective and further analysis is performed, results were not always formally documented in a revised cause analysis.
4/30/2018	WRPS-PER-2018-0982	Self-Assess Find 6: Inadequately screened PERs	Washington River Protection Solutions LLC (WRPS), Corrective Action Management Group conducted a management-directed self-assessment to evaluate the adequacy, implementation, and effectiveness of the WRPS Corrective Action Program. The assessment team conducted in-depth data reviews, observed the performance of corrective action process functions, and held interviews with various stakeholders. Finding 6: The PER screening process has, in some cases, inadequately screened issues. The screening call is challenged by inconsistent and/or inadequate attendance, which could diminish the collective and clear understanding of each condition that needs to be reviewed and corrected.
4/30/2018	WRPS-PER-2018-0983	Self-Assess Obs 1: Revise first criteria bullet of Attachment C	Washington River Protection Solutions LLC (WRPS), Corrective Action Management Group conducted a management-directed self-assessment to evaluate the adequacy, implementation, and effectiveness of the WRPS Corrective Action Program. The assessment team conducted in-depth data reviews, observed the performance of corrective action process functions, and held interviews with various stakeholders. Observation 1: The first criteria bullet of Attachment C of TFC-ESHQ-Q_C-C-01 lists several important impacts to consider when establishing significance levels, but could be revised to more clearly list "health and safety of the public or environment."

4/30/2018	WRPS-PER-2018-0984	Self-Assess Obs 2: Recurring issues in EAPC Safety Books	Washington River Protection Solutions LLC (WRPS), Corrective Action Management Group conducted a management-directed self-assessment to evaluate the adequacy, implementation, and effectiveness of the WRPS Corrective Action Program. The assessment team conducted in-depth data reviews, observed the performance of corrective action process functions, and held interviews with various stakeholders. Observation 2: A review of the Employee Accident Prevention Council (EAPC) Safety Books from 5/16/17 to 2/26/18 yielded 97 entries resulting in 5 initiated PERs. The Contractor Assurance and Industrial Safety organizations previously agreed to initiate PERs for issues which could not be resolved in 60 days or less. The concern in this observation centers on the adequacy of the agreement and whether recurring issues related to things such as handrails, laundry, and forklift safety are appropriately addressed.
4/30/2018	WRPS-PER-2018-0985	Self-Assess Obs 3: Wording is somewhat ambiguous for SIG PERs	Washington River Protection Solutions LLC (WRPS), Corrective Action Management Group conducted a management-directed self-assessment to evaluate the adequacy, implementation, and effectiveness of the WRPS Corrective Action Program. The assessment team conducted in-depth data reviews, observed the performance of corrective action process functions, and held interviews with various stakeholders. Observation 3: The criterion in Attachment C of TFC-ESHQ-Q_C-C-01 specific to a Significant significance level could be revised to more clearly list 'health and safety of the public or environment' as the wording is somewhat ambiguous where this point is concerned.
4/30/2018	WRPS-PER-2018-0986	Self-Assess Obs 4: Way to capture TUF with Extent	Washington River Protection Solutions LLC (WRPS), Corrective Action Management Group conducted a management-directed self-assessment to evaluate the adequacy, implementation, and effectiveness of the WRPS Corrective Action Program. The assessment team conducted in-depth data reviews, observed the performance of corrective action process functions, and held interviews with various stakeholders. Observation 4: Currently when a PER is screened as a TUF with Extent, the system has no formal way to capture the Extent portion. The only option in the pull-down on the Screening tab for 'PER Significance Level' is to choose 'TUF,' and then manually type 'TUF with Extent' in the PER Screening Comments section. Options could be explored as to how to capture a significance level of TUF with Extent more effectively on the Screening Tab. For example, if 'TUF' is chosen as the PER significance level, a checkbox could be added to check if an Extent of Condition also needs to be completed on a TUF.

4/30/2018	WRPS-PER-2018-1122	WRPS-MOP-2018-1298	During a MOP (WRPS-MOP-2018-1298) of an Electrical Calculation (RPP-8183) using the Engineering Calculation Procedure (TFC-ENG-DESIGN-C-10), the calculation was determined to need an update to address three assumptions. These assumptions do not impact the results; however, this conclusion is not apparent from the information within the report. Reviewed assumptions in calculation RPP-8183 with the responsible Electrical Engineers. Found three issues: 1. The actual rating was unknown due to it being unreadable in the field and the calculation assumes a minimal 30A rating on for a motor load. This assumption needs further clarification within the assumptions section. Consider using NEC Table 430.251 and discussing the upstream incident energy value [Reference pdf page 25-29 of pdf - Appendix A]. 2. The 30A Allen-Bradley switch assumptions does not appear to impact the results of the calculation since it is a parameter associated with the switch box not the fuse itself. Consider removing this assumption if it is not a design input [Reference pdf page 25-29 of pdf - Appendix A]. 3. If the breaker type is assumed to be Cutler-Hammer and equivalent to the other possibility (Westinghouse), document this fact in the assumptions section [Reference pdf page 25-29 of pdf - Appendix A].
4/30/2018	WRPS-PER-2018-0988	Self-Assess Obs 5: Screening Team lacks consideration for repetition	Washington River Protection Solutions LLC (WRPS), Corrective Action Management Group conducted a management-directed self-assessment to evaluate the adequacy, implementation, and effectiveness of the WRPS Corrective Action Program. The assessment team conducted in-depth data reviews, observed the performance of corrective action process functions, and held interviews with various stakeholders. Observation 5: TFC-ESHQ-Q_C-C-01, REV M-8, Problem Evaluation Request, Attachment A – Screening Team Worksheet, does not address consideration for repetition of specific adverse conditions (i.e., trends), or the relationship or similarity between different conditions.
4/30/2018	WRPS-PER-2018-0989	Self-Assess Obs 6: Difficult to find a list of Performance Trend PERs	Washington River Protection Solutions LLC (WRPS), Corrective Action Management Group conducted a management-directed self-assessment to evaluate the adequacy, implementation, and effectiveness of the WRPS Corrective Action Program. The assessment team conducted in-depth data reviews, observed the performance of corrective action process functions, and held interviews with various stakeholders. Observation 6: It was difficult to find a list of Performance Trend PERs. Consider adding fields to the PER software to indicate the PER is a Performance Trend PER.

4/30/2018	WRPS-PER-2018-0990	Self-Assess Find 5: Procedure lacks training requirement for ERs	Washington River Protection Solutions LLC (WRPS), Corrective Action Management Group conducted a management-directed self-assessment to evaluate the adequacy, implementation, and effectiveness of the WRPS Corrective Action Program. The assessment team conducted in-depth data reviews, observed the performance of corrective action process functions, and held interviews with various stakeholders. Finding 5: During the revision of TFC-ESHQ-Q_C-C-01, Problem Evaluation Request, from M-7 to M-8, the requirement that ERs are to be conducted using trained and qualified personnel was inadvertently revised out. Previous discussion on training and qualification of personnel performing Effectiveness Reviews (ERs) identified that the Assessment Team Leader qualification (Qualification Card 350319) was not applicable to the conduct of ERs and that Cause Analysis (Course 357011) and/or Trend Analysis Concepts and Methods (Course 357024) training cover the knowledge needed for conducting an ER. Additionally, DOE O 226.1B states personnel are to be trained and qualified. Courses 357011 and 357024 are classroom training session and not necessarily qualifications that certify a level of competency of an individual prior to performing a task/function. Requirement flowed down in the Tank Farm Contract: DOE O 226.1B, Implementation of Department of Energy Oversight Policy, Attachment 1, Contractor Requirements Document, Section 2.b.(3): "After completion of a corrective action or a set of corrective actions, an effectiveness review is conducted using trained and qualified personnel that can validate the effectiveness of corrective action/plan implementation and results in preventing recurrences" The purpose of this PER is to correct TFC-ESHQ-Q_C-C-01 to specify the required training and qualification for personnel assigned to conduct ERs.
4/30/2018	WRPS-PER-2018-0991	Self-Assess Obs 7: Extension request not approved by RM	Washington River Protection Solutions LLC (WRPS), Corrective Action Management Group conducted a management-directed self-assessment to evaluate the adequacy, implementation, and effectiveness of the WRPS Corrective Action Program. The assessment team conducted in-depth data reviews, observed the performance of corrective action process functions, and held interviews with various stakeholders. Observation 7: WRPS-PER-2014-0943.2 (closed during the past year) contained an extension request that was not approved by the Responsible Manager (RM), nor was the RM copied on the request. Instead, the RM's manager approved the extension request without denoting that the approval was for the RM or as an "act as capacity".
4/30/2018	WRPS-PER-2018-0992	Self-Assess Obs 8: PER-2016-2395 closed with no actions	Washington River Protection Solutions LLC (WRPS), Corrective Action Management Group conducted a management-directed self-assessment to evaluate the adequacy, implementation, and effectiveness of the WRPS Corrective Action Program. The assessment team conducted in-depth data reviews, observed the performance of corrective action process functions, and held interviews with various stakeholders. Observation 8: PER-2016-2395 was closed without taking any actions. The responsible manager (RM) evaluated the condition and created an action (WPRS-PER-2018-0991.1) to communicate the expectation for the use of personally owned test equipment at tank farms. However, the RM closed the action stating WRPS procedures do not prevent bringing personnel equipment on site. The RM failed to identify that TFC-OPS-MAINT-C-03, Maintenance Tools and Equipment Control, controls the use of maintenance and test equipment (M&TE) needed to support the Tank Operation Contract (TOC). Since personally owned M&TE are covered by TFC-OPS-MAINT-C-03 and not authorized for use in support of the TOC, there is no reason to bring them on sight. Thus, a communication on the requirement to used M&TE control per TFC-OPS-MAINT-C-03 is an appropriate minimum action and should have been implemented.

4/30/2018	WRPS-PER-2018-1116	VMDR avoid misunderstandings	Interaction between CTO and Tank Farms Projects organizations prior to the transfer of Vapor Monitoring, Detection, and Remediation (VMDR) technology (at the end of Phase II of testing) has been insufficient to avoid misunderstandings regarding the status of test equipment and the maturity of a key equipment vendor's QA program (Cerex). This PER is being submitted to recommend these organizations, and possibly Commissioning, perform a joint " post-mortem" to clearly identify the technology transfer issues that have occurred, their various causes, and to develop appropriate policies, procedures, and practices that will significantly reduce the risk of these issues reoccurring. Both formal and informal processes, as well as roles and responsibilities should be explored. See also the following documents, WRPS-MOP-2017-3071, Technical Rigor – Technical Development Process WRPS-MOP-2017-2881, as well as TFC-PLN-90, Technology Maturation Management Plan TFC-PRJ-TD-C-01, Technology Maturation Management, and TFC-PRJ-PM, Project turnover and Closeout/Suspension.
4/30/2018	WRPS-PER-2018-1115	FY2018-MI-MD-0378	1) The management assessment, FY2018-MI-MD-0378, CTO Technology Transfer Process, found that a documented program for technology development is in place and generally effective (TFC-PLN-90, Technology Maturation Management Plan and TFC-PRJ-TD-C-01, Technology Maturation Management). The management assessment identified an area of programmatic weakness in the level of detail provided for the turnover/transition of technology to other organizations (i.e., technology transfer). The assessment reviewed TFC-PRJ-PM-C-28, Project Turnover and Closeout/Suspension, and also found it also is lacking in detail regarding the turnover process. Procedural detail is lacking regarding the requirements and process for executing the transfer of matured technology (TRL-6) to other organizations for further maturation completion through commissioning (TRL-7 & TRL-8) and system operations (TRL-9). The absence of procedural detail applies both to the transferring organization (e.g., CTO) and the receiving organization (e.g., Tank Farm Projects). A recommendation of the management assessment is that the technology transfer process be better defined and documented. 2) The review of TFC-PLN-90, found three references to TFC-PRJ-TD-C-01 where the incorrect title is given. In sections 3.5 and 6.2, as well as Figure 3, TFC-PLN-90 references the title of TFC-RJ-TD-C-01 as "Technology Development, Maturation, and Risk Management." The actual title is "Technology Maturation Management."
4/30/2018	WRPS-PER-2018-1124	EAM is creating due dates that are not reliable or realistic for repetitive work packages	Due dates listed in EAM reports do not agree with actual annual performance of vent and balance PMs. Compared work package record copies for completion date against the due dates in the weekly PM report. None of the dates for the selected work packages were equal to 365 days. Some were less than and some exceeded 365 days. Examples of work packages with incorrect due dates attached to MOP.

4/30/2018	WRPS-PER-2018-1125	protective equipment for tears	Out of the 40-45 personnel observed at AX tent, 8-10 personnel at AY-2 tent, and 25-30 personnel at 222-S Lab change room, approximately 25-30% of them were not seen to be thoroughly checking their selected personal protective equipment for tears, deterioration, and other damage as required by HNF-5183, Appendix 3C, Contamination Control Practices.
4/30/2018	WRPS-PER-2018-1126	AX change tent	At the AX change tent, out of the 40-45 workers observed, 2 were seen inadvertently stepping on boundary lines, Radiological Buffer Areas (RBA) while staying in a Radioactive Material Area. Because the workers did not realize they had crossed or stepped on the boundary line, they did not conduct a hand and foot survey out of the RBA as required.
4/30/2018	WRPS-PER-2018-1127	turbo-frisking	While conducting field observations, a total of 6 personnel at AY-2 Tent, 10-12 personnel at AX change tent, and 8-10 personnel at 222-S were seen frisking or conducting their own hand/foot self surveys. Most of these personnel was seen properly conducting their surveys however, one (b)(6) at the AX change trailer was seen turbo-frisking the masks. (b)(6) on radiological workers. The individual was questioned of their knowledge of proper survey speed and corrected on the spot.

4/30/2018	WRPS-PER-2018-1132	MOP WRPS-2018-1325 #1	Recent organization changes within Engineering have changed the roles & responsibilities (R2A2) within the process engineering function. The Engineering Program Management Plan was review to determine what changes were necessary to align the plan with the new organization structure. Review of the following sections indicates that revisions are necessary: Section 13.7 Process Engineering Analysis; Section 13.7.1 Waste Tank Chemistry Control; Section 13.7.2 Tank Waste Inventory & Characterization; Section 13.7.3 Tank Farms Waste Transfer Compatibility Program; and Section 13.7.4 Waste Feed Delivery Technical Baseline. Additionally, moving the Tank and Pipeline Integrity responsibilities found in Section 13.8.2 and Section 13.8.3 under the process engineering function is necessary, along with other scope corrections.
4/30/2018	WRPS-PER-2018-1133	WRPS-MOP-2018-1269 #1	During the performance of a "Walk Your Spaces MOP" performed at WRPS-RMA-012, the following radiological deficiencies were found (See MOP for additional details/pictures): - Two RMA signs missing required information on the signs (e.g. bullets, requirements). - Several RMA signs that are in need of repair due to being driven over. - Fading of radiological tags/labels due to exposure to elements. - Buildup of tumbleweeds in the RMA. - Commingling of radioactive and non-radioactive material, or radioactive material not labeled in the RMA. - Non-radioactive dunnage stored in RMA. - Two impact guns stored in the same wooden box; one is tagged as radioactive material, the other is not. The outer box is not tagged or marked. - Rad ropes and signs not properly stored (abandoned in small pile on ground). - Backhoe bucket stored in RMA. Its radiological status is not clear.
4/30/2018	WRPS-PER-2018-1134	WRPS-MOP-2018-1277	The automated surveillance systems currently being used to acquire and report data are the Surveillance Analysis Computer System (SACS) and Surveillance Data Display System (SDDS). SACS was designed to take one reading a day from the surface level sensors to aid in trending the waste level inside the underground storage tanks. SACS cannot accommodate the growth and needs of the users in its current design. SDDS is a website developed in 2003 that allows users to view data from Hanford surveillance systems, such as the Tank Monitoring and Control System (TMACS) or the AY/AZ Farm Monitoring System, over the Hanford Local Area Network (HLAN). SDDS was designed to show current readings and keep them for short periods (less than 30 days) for short-term trending. The data archive needs of the control system have exceeded the capabilities of both systems. The tank farms DSA provides almost no information on these surveillance systems. Given that these systems are not safety-significant, have no control functions, and are not important to understanding the hazards and accident analysis and the selected controls, the absence of descriptions from DSA Chapter 2 is not inconsistent with the requirements of DOE-STD-3009-94. As described below, however, information on the surveillance systems may benefit users of the DSA. An upgrade is in progress to replace these outdated systems. RPP-SPEC-54016 indicates that the OSIsoft® PI System product will replace the current SACS and SDDS systems. The PI System will aggregate and archive information from sensor monitoring and surveillance systems on the Hanford site. The PI System will be capable of importing all historical data stored in the SACS and SDDS systems and will archive the data before the SACS and SDDS systems are retired. Users will be able to see current readings and historical trends of specified data in a web-based front end. Users will be able to view and trend current readings and historical trends in a desktop client application. Documents that will implement this upgrade have been entering the USQ process and USQ evaluators have indicated that it would be helpful to them if a high-level description of the transition to the PI system was added to Chapter 2 of the tank farms DSA. Independently, the Process Software Engineering Manager has made a similar recommendation.

4/30/2018	WRPS-PER-2018-1135	AN101-WST-LIT-104 PRIMARY ENRAF HAS AN ES-0606 CODE.	AN101-WST-LIT-104 PRIMARY ENRAF HAS AN ES-0606 CODE. THIS IS A SYCHRONIZATION DRUM ERROR WHICH WILL NOT LET US GET AN ACCURATE READING UNTIL THE CODE IS CLEARED
4/30/2018	WRPS-PER-2018-1136	Unplanned shutdown occurred for POR 126 AX Farm Retrieval 296-P-49	Unplanned shutdown occurred for POR 126 AX Farm Retrieval 296-P-49 (P-296P049-001).
4/30/2018	WRPS-PER-2018-1137	Unplanned shutdown occurred for the 241-AY/AZ Tank Farm Ventilation System chiller	Unplanned shutdown occurred for the 241-AY/AZ Tank Farm Ventilation System chiller at 0350 hours.

4/30/2018	WRPS-PER-2018-1138	Application of the Engineering Technical Rigor Improvement Tool	Application of the Engineering Technical Rigor Improvement Tool to WRPS-PER-2017-2695 identified the following process improvement for consideration for application to the WRPS Engineering Program: The current condition is judged to be adequate and effective, however the following improvement can lead to a strengthened engineering program. Consideration should be given to development of criteria for deciding when a second qualified engineer and/or engineering manager review and approval of an engineering product is needed. Review and approval requirements are imbedded for engineering deliverables developed using engineering administrative procedures, but there is no guidance for engineering deliverables generated using procedures owned by other organizations (e.g. Technical Procedures, Administrative Procedures, and Work Packages).
4/30/2018	WRPS-PER-2018-1139	CAS Manager Roles and Responsibilities Not Clearly Defined	CAS Manager Roles and Responsibilities Not Clearly Defined The term "CAS manager" has been used informally at WRPS throughout the years and has been referenced in some procedures. However, the function of a Contractor Assurance System (CAS) or Corrective Action System (CAS) manager is not defined in WRPS processes or by title based on Human Resources position descriptions. A search of all administrative procedure for the term "CAS Manager" returned the three procedure listed below, which references a CAS manager, but does not defined their roles and responsibilities. - TFC-OPS-OPER-C-14, Event Investigation Event Investigation Process "Department Contractor Assurance (CAS) Manager" is specified in this procedure the acronym "CAS" is used throughout the procedure. As written in the procedure, the acronym CAS means "Department Contractor Assurance." However, there is only one officially designated Contractor Assurance Manager for WRPS (M Peloquin) as per the official organizational structure and HR positions descriptions. Additionally, CAS is the acronym for Contractor Assurance System in DOE directive. For example DOE G 226.1-2A, Federal Line Management Oversight of Department of Energy Nuclear Facilities, specifies CAS as Contractor Assurance System. DOE O 226.1B does not use the acronym, but does use the term Contractor Assurance System throughout. - TFC-CHARTER-05, Corrective Action Review Board The terms "CAS Manager List" and "Organizational CAS Manager" appears three times in this procedure. It states the CAS Manager list can be found posted on a web page. The CAS Manager List is a Word document that lists eight managers and two staff employees. Since the term Manager carries actual and perceived authority one would think a list of CAS Manager would consist of actual managers who have the authority and responsibility for decision that are asked to make. The term "Organizational CAS Manager" is included in lists for required invitees and optional attendees. The acronym CAS is not spelled out in the procedure. - TFC-ESHQ-Q_C-C-01, Problem Evaluation Request The term "Organizational CAS Manager" is used once in this procedure in a routing list for review of Long Term Corrective Action (LTCA) worksheet. The acronym CAS is not spelled out in the procedure. A document that specifies the R2A2s for designated CAS managers could not be found. Thus, referencing CAS Managers (a position not formally defined or established) in a procedure creates problems. In comparison, the Collective Significance Review (CSR) members are defined along with their responsibilities in TFC-CHARTER-44, Collective Significance Review, and are listed by name in the CSR Agenda and the approved meeting minute records. Another example would be the Executive Safety Review Board (ESRB) members as defined by TFC-CHARTER-32. RA managers involved with trending are also defined along with their responsibilities in TFC-ESHQ-Q_C-C-06, Trend Analysis Process. The purpose of this PER is to formalize the CAS manager function in procedure so their roles and responsibilities are clear along with when this body of managers should be invoke in a review or decision making process. Recommend assignment to Contractor Assurance as a TUF.
4/30/2018	WRPS-PER-2018-1140	Application of the Engineering Technical Rigor Improvement Tool #2	Application of the Engineering Technical Rigor Improvement Tool to WRPS-PER-2017-2695 identified the following process improvement for consideration for application to the WRPS Engineering Program: The current condition is judged to be adequate and effective, however the following improvement can lead to a strengthened engineering program. The criteria used for selection of a computation method rather than a calculation method should be evaluated to determine how to prevent inappropriate use of informal computations. Consideration should be given to evaluation of the need for controls on the use of an informal computation versus a formal calculation.

4/30/2018	WRPS-PER-2018-1141	LTCA/Correction Action Review Process Improvement Recommendation	While reviewing the Long Term Corrective Action (LTCA) Worksheet and TFC-ESHQ-Q_C-C-01 Problem Evaluation Request procedure, an opportunity exists to improve the way WRPS addresses corrective actions as we approach contract transition. During a recent review of Production Operations corrective action backlog of issues, the following list of questions came to mind: - Based on the age of the actions, are the issues still valid? - Do they in-fact represent Conditions Adverse to Quality (or are they suggested improvements)? - Do they represent "un-resolved immediate life/health/safety issues"? - Is WRPS obligated to complete the ESTARS actions prior to contract closeout, or with-in a defined contract extension period? - Does WRPS have a defined process for the review of PER backlog and criteria established to document the review with recommendations to close; move to the "risk register/similar program"; or keep as written? The Long Term Corrective Action Worksheet and procedural guidance from TFC-ESHQ-Q_C-C-01, Problem Evaluation Request focus on the following..."determine whether a corrective action may be designated as long-term which will exclude the action from timeliness expectations for correction of the problem since the implementation time will be outside the expected norm. Generally, a corrective action can be considered for designation as LTCA if the resolution of the corrective action exceeds 180 days after corrective actions are identified." WRPS should consider developing additional criteria based on the questions above (not limited to) and develop a worksheet to document the review and decision for each action currently in ESTARS and those added between now and WRPS contract closeout.
4/30/2018	WRPS-PER-2018-1142	Application of the Engineering Technical Rigor Improvement Tool #3	Application of the Engineering Technical Rigor Improvement Tool to WRPS-PER-2018-0295 identified the following process improvement for consideration for application to the WRPS Engineering Program: The current condition is judged to be adequate and effective, however the following improvement can lead to a strengthened engineering program. Develop an Engineering Function procedure or desk instruction to supplement TFC-PRJ-CM-C-19, Construction Fabrication, Inspection, and Test (FIT) Plan. This instruction is to include guidance on: •Selection of specialty reviewers and approvers for FIT Plans (e.g. Welding SME, Hoisting and Rigging Engineer, etc.) •Expectations of FIT Plan content and level of detail.
4/30/2018	WRPS-PER-2018-1143	average number of tankers being sent from the 200 West Mixed Waste Burial Trench to the ETF has more than doubled	The average number of tankers being sent from the 200 West Mixed Waste Burial Trench to the ETF has more than doubled when looking over the number of tankers sent per inches of precipitation in the area. See table below. Data is current in 2018 up to 3/30/18. MWT Leachate to ETF Year Precip (in) Tankers Tankers/ Precip (in) % Change from 2015 2018 3.85 37 2.8 TBD 2017 8.65 114 13.3 244 2016 7.65 59 2.72 100 2015 6.48 25 3.9 2014 6.53 39 2.9

4/30/2018	WRPS-PER-2018-1145	Unplanned shutdown occurred for the ETF Ventilation Systems (Vessel Ventilation and RCA) due the loss of the air compressor	Unplanned shutdown occurred for the ETF Ventilation Systems (Vessel Ventilation and RCA) due the loss of the air compressor.
4/30/2018	WRPS-PER-2018-1146	discrepancies between the QA Surveillance Database, the Surveillance Schedule, and the Surveillance records in IDMS	Upon a review of the separate QA systems, there were discrepancies between the QA Surveillance Database, the Surveillance Schedule, and the Surveillance records in IDMS.
5/1/2018	WRPS-PER-2018-1144	flow rate out of Slurry Pump P-B-2	The 242-A Evaporator Operation Manager contacted Engineering because the flow rate out of Slurry Pump P-B-2 could not be increased. The speed of the pump was indicating 72%.

5/1/2018	WRPS-PER-2018-1148	Flanders HEPA filter bags	Flanders HEPA filter bags are past their shelf life.
5/1/2018	WRPS-PER-2018-1149	MSA employee did not comply with posted radiological signs and rope/chain	A MSA employee did not comply with posted radiological signs and rope/chain and crossed four radiological barriers in a short period of time and violated ingress and egress protocols for contamination control. The four barrier violations were (1) RBA to CA, (2) CA to Clean Area, (3) Clean Area to RBA, and (4) RBA to CA. The initialing violation is listed below and subsequent violations resulting from the initiating violation are listed on the attachment.
5/1/2018	WRPS-PER-2018-1150	PTC® Durometer	PTC® Durometer. Model# 411, Serial # 20322 (M&TE# 817-77-07-004) "As Found" reading during calibration was Out-Of-Tolerance. It was "Rejected" by the Lab.

5/1/2018	WRPS-PER-2018-1153	222-S woman's change room water quality.	In 222-S Safety Book Item #LAB-06 (1/24/18) individual alleged that water in 222-S women's change room sinks runs brown-colored, has a mold odor and thus cannot be sanitary for washing – it should be tested (see attachment #1). This issue was assigned to 222-S Operations with Lab EAPC Co-chair taking the lead. Co-chair made contact with concerned individual and initiated the following actions (keeping concerned individual informed with progress). Chronology of actions are as follows: •On 2/8/18 MSA Drinking Water Compliance Office performed free chlorine testing in various 222-S Complex sources. With minimal flushing free chlorine levels in the 222-S were found to be "just under" the 0.2mg/L target concentration for potable water. Water Compliance recommended regular flushing of building water system to raise the chlorine level and alleviate the turbidity (see attachment #2). This flushing was initiated. •On 2/15/18 MSA Water Compliance performed bacterial analysis of the 222-S women's change room sinks. Test confirmed satisfactory water quality (attachment #3) •MSA Water Compliance follows up with explanatory email, 3/14/18, discussing above noted testing results, their conclusion that 222-S water is within state drinking water requirements and challenge of cloudy water at Hanford – communication shared with concerned employee. In spite of the satisfactory water quality testing and the action to flush the women's change room water lines, concerned individual declined to sign off Safety Book item that appropriate action was taken. Since this Safety Book item can thus not be closed with employee's concurrence, it must be closed (per procedure) with submittal of this PER.
5/1/2018	WRPS-PER-2018-1154	WRPS Failed to Follow PER Screening Criteria	Report Number and Title: 18244-TF - WRPS PER Screening and Corrective Action Effectiveness of TOD Issues January 8, 2018 through February 23, 2018 Brian Fischer Ron Ciola Scope: Determine if WRPS PER system adequately screened and, ultimately, if corrective actions taken have effectively resolved the identified Tank Farms Operations Division (TOD) issues, per TFC-ESHQ-Q_C-C-01, Rev M-8, Problem Evaluation Request. ---------- 18244-TF-F0I - WRPS Failed to Follow PER Screening Criteria (Priority Level 3, Fischer). Requirements: TFC-ESHQ-Q-C-C-01, Problem Evaluation Request, Rev M-8; Attachment C, Screening Criteria stated: PER with Resolution (RES) • Recurring issues where previous identification of the issue has not resulted in resolution" Discussion: Contrary to the requirement in WRPS procedure TFC-ESHQ-Q_C-C-01, Problem Evaluation Request, Attachment C, Screening Criteria, several ORP-DOE issues were not screened as PER with Resolution (RES), despite meeting screening criteria of "Recurring issues where previous identification of the issue has not resulted in resolution."
5/1/2018	WRPS-PER-2018-1155	Recommendations to Improve the Problem Evaluation Request Process	Report Number and Title: 18244-TF - WRPS PER Screening and Corrective Action Effectiveness of TOD Issues January 8, 2018 through February 23, 2018 Brian Fischer Ron Ciola Scope: Determine if WRPS PER system adequately screened and, ultimately, if corrective actions taken have effectively resolved the identified Tank Farms Operations Division (TOD) issues, per TFC-ESHQ-Q_C-C-01, Rev M-8, Problem Evaluation Request. ---------- 18244-TF-O01 - Recommendations to Improve the Problem Evaluation Request Process (Ciola). Discussion: A review of recent Problem Evaluation Requests (PER) revealed inconsistencies in the use of the process and its effectiveness. Referring to procedure TFC-ESHQ-Q_ C-C-01, Problem Evaluation Request, Rev. M-8, roles and responsibilities should be evaluated to ensure that they are well outlined and understood. For example, the screening team must evaluate trends and recurrences to determine whether it is proper to assign causal analysis and extent-of-condition, and the procedure is scant in discussing this role. Also, the "Responsible Manager" is not required to identify recurrences or recommend a significance level; however, they are likely the most familiar with the issues and are, thus, more likely to understand if this is a recurring issue. Further, terminology should be reviewed to ensure clarity and consistency. For example, the process dictates that if an issue is recurrent, it should be assigned causal analysis and extent-of-condition. The term "recurrence" should be defined. Key players in the process would benefit from training. Currently, Corrective Action Management Training Course 357019 is not required for either the Responsible Manager or screening team members. WRPS should consider a LEAN-style evaluation of the entire PER process for improvements. This approach would also fully address concerns identified in WRPS-PER-2018-0743, which cites the screening team is not getting information necessary to identify issues requiring causal analysis and extent-of-condition. REF: TOD Weekly 4-23-18; R Ciola; OFI; 18244-TF

5/1/2018	WRPS-PER-2018-1156	Clarifying the language used in the DSA section 5.5.2.1.2 and the TSR SR 3.1.1.B bases and in the Special Instructions in the	TITLE of PER: Clarifying the language used in the DSA section 5.5.2.1.2 and the TSR SR 3.1.1.B bases and in the Special Instructions in the Vent and Balance Primary Tank Air Flow Test Data Scope: DOE Order 426.1 Federal Technical Capability, Appendix D, Section 2, (a), states that SSO personnel should "maintain communication and oversight of systems and monitor performance of the contractor's Cognizant System Engineering Program." --- Issue Type: OFI (Opportunity for Improvement) Significance Level: 1 Statement: 18240-TF-001: Clarifying the language used in the DSA section 5.5.2.1.2 and the TSR SR 3.1.1.B bases and in the Special Instructions in the Vent and Balance Primary Tank Air Flow Test Data Sheets in order to more clearly convey the same understanding is an opportunity for improvement (OFI). Discussion: The language in the DSA and TSR related to a "segment' of the DST primary ventilation system being isolated and therefore not verified, and therefore was not to be operated, was not clear and needed to be clarified. The WRPS Nuclear Safety Manager and the Safety Basis Compliance Officer indicated that because the intent was to demonstrate integrity (limited air in-leakage), each de-entrainer only has to be tested with one exhauster and the term "isolated segment" was intended to mean that segment was isolated from both exhausters (i.e., it was never tested with either A or B Train). In addition, the current wording in the DSA and TSRs is not aligned with the Special Instructions given in the Vent and Balance Primary Tank Air Flow Test Data Sheets which require notification for failed items but do not mention notification for untested items. Clarifying the language is an opportunity for improvement (OFI). REF: TOD Weekly 4-23-18; D Irby; OFI; 18240-TF
5/1/2018	WRPS-PER-2018-1157	The Use of Engineering Judgment and Engineering Calculation Record Retention Could Be Improved.	Report Number and Title: 18250-TF, Surveillance of AX-102C Riser IA P200 Pump Load Supporting Actions Scope: The scope of this surveillance was to evaluate the TF-AOP-020 response to AX-102C riser IA P200 pump load supporting. Requirements Reviewed: 10 CFR 851, Worker Safety and Health Program 36 CFR 1220, Federal Records 44 USC 3301, Definition of Records Documents and Records Reviewed: TF-AOP-020, Revision G-2, Response for Placing Personnel and Equipment in a Safe Condition TFC-BSM-IRM_DC-C-02, Revision F-16, Records Management TFC-ENG-DESIGN-C-10, Revision B-12, Engineering Calculations Work Order #260741, AX-102 Remove Pump from 02C RIA --- 18250-TF-001 -The Use of Engineering Judgment and Engineering Calculation Record Retention Could Be Improved. (Reyes/Sondall) Discussion: On 04/04/18, Al AX retrieval engineering performed a calculation to support a response plan for an entry into TF AOP-020, Revision G-2, Response for Placing Personnel and Equipment in a Safe Condition. Engineering calculated the steel dunnage sizing necessary to support the weight of the AX-102C riser IA P200 pump. Several assumptions were used in the calculation, including the weight of the pump, the number of steel tubes used for dunnage, the length of the dunnage span, and the type of load that the dunnage has to support. The appropriately sized dunnage, based on the engineering calculation, was obtained by the work crew and used to support the weight of the pump. The calculation was not formally documented.
5/1/2018	WRPS-PER-2018-1158	Two Lead sheeting was found buried in AX-Farm	Two Lead sheets were found buried in AX-Farm in the vicinity of 241-AX-103. The reason for the lead installation was not known.

5/2/2018	WRPS-PER-2018-1159	Additional PER to WRPS-PER-2018-0326 Excessive Sample Inventory	In Safety Book Item #LAB-08 (2/8/18, attached) individual identified the following issues regarding the storage of non-Rad samples in 222-S Lab room 2B: 1. Several containers organizing groups of samples were old and beginning to degrade (Note – these outer containers did not serve as secondary containment they were simply meant to keep sample groups together.) 2. A significant number of these samples are several years old – well beyond their shelf life - and should be disposed of for ConOps/Housekeeping reasons. Actions to address this issue are as follows: • Sample storage racks in question were surveyed, all degraded outer containers were identified and replaced • Initial discussions (2/14/18) with WHL regarding old sample disposal suggested that this issue could be addressed under their CAMPATS annual action #CR-2016-001 to "inspect older plastic secondary sample containers and replace any that show signs of deterioration". Later internal WHL discussion (2/22/18) determined issue should be handled by WRPS Room Owner/Sample Management Group. • Follow-up with Sample Management Group Manager verified that they were already working on the disposal of old samples (both Rad and non-Rad) and the issue was being tracked under WRPS-PER-2018-0326 – disposal of old samples involves a considerable amount of recordkeeping so the inventory of old samples is being chipped away on a weekly basis. Additionally Sample Management has added a line item to their monthly room inspection to look for/correct any degraded outer sample containers. Concerned employee was notified of above actions and PER outstanding to track issue. Individual, however, felt that this PER related to an ALERA concern and thus would not track closure of the non-Rad old sample inventory. Employ declined to sign off Safety Book item agreeing that appropriate action was being taken. Since this Safety Book item can thus not be closed with employee's concurrence, it must be closed (per procedure) with submittal of this PER.
5/2/2018	WRPS-PER-2018-1160	TFC-ENG-FACSUP-C-04	For my May 2018 MOP, I evaluated the latest version of TFC-ENG-FACSUP-C-04, Tank Farms Process Memos. As 242-A Operations Manager, I review/use process memos routinely to support 242-A campaigns. During the review of the process memo for campaign EC-08, I discovered the following issues with the Process Memo procedure: 1) The described sequence of development and approval seems to be out of order: a. Step 4.3.18 instructs the originator to deliver the original signed memo to the shift manager (procedure does not specify which shift manager, CSM, ADM, 242-A). The next step (4.3.19) is the approval step for the operations manager. Why would the process memo be delivered to anyone before the operations manager approves it? 2) Step 4.3.24 instructs the originator to deliver the original signed memo to the shift manager (procedure does not specify which shift manager). How is that different than step 4.3.18? 3) Section 4.4 discusses the process for changing process memos. When is this direction applicable? After operations manager sign-off? After USQ? When is a process memo "changed"? 4) Section 4.5 discusses closing a process memo. Steps 1 and 3 are not the responsibly of the Central Shift Manager, suggest revisiting this section to proper denote responsibility. This PER was written to document the findings of this MOP.
5/2/2018	WRPS-PER-2018-1161	continuous HPT coverage	While performing PH Calibrations on April 25th, it was discovered that continuous HPT coverage was not performed by assigned HPT by RadCon First Line Manager as required by Radiological Work Permit LE-003 Rev 028.

5/2/2018	WRPS-PER-2018-1162	2225 handling and care of lead bricks	In Safety Book Item #LAB-05 (1/24/18, attached) individual suggests having a 222-S Lab procedure for the consistent wrapping of lead bricks used for shielding in analytical areas. Actions to address this issue are as follows: •Action to write requested procedure assigned to 222-S Process Chemistry Group •Procedure (ATS-LO-150-161, 222-S Lab Wrapping Lead Bricks) written with input from all groups (e.g. H&S, RadCon) •Draft procedure through 222-S approvals, however, this is a joint procedure with WHL who has yet to approved (has been held up for about 2 months by WHL) Concerned employee has been updated on procedure development process but prefers not to sign off Safety Book item until procedure has been issued. Since this Safety Book item can thus not be closed with employee's concurrence in required 60 days, it must be closed (per procedure) with submittal of this PER.
5/2/2018	WRPS-PER-2018-1163	Unplanned shutdown of portable exhauster POR-126.	Unplanned shutdown of portable exhauster POR-126.
5/2/2018	WRPS-PER-2018-1151	unplanned shutdown occurred for the POR-126	An unplanned shutdown occurred for the POR-126 at 0725 hours on 4/28/2018 due to high vacuum from AX-102.

5/2/2018	WRPS-PER-2018-1152	Unplanned shutdown occurred for the POR-127 Portable Exhauster	Unplanned shutdown occurred for the POR-127 Portable Exhauster.
5/2/2018	WRPS-PER-2018-1123	241-AZ Annulus Exhauster HEPA Filter Aerosol Testing Failed on Filter AZ241-VTA-FLT-220	241-AZ Annulus Exhauster HEPA Filter Aerosol Testing Failed on Filter AZ241-VTA-FLT-220.
5/2/2018	WRPS-PER-2018-1164	Proto Torque Wrench	Proto Torque Wrench, Model# 6006C, Serial # DQD20262 (M&TE # 813-88-01-056) "As Found " reading during calibration was Out-Of-Tolerance. Unit was locked up and Failed all tests.

5/3/2018	WRPS-PER-2018-1167	TFC-ESHQ-IH-STD-14 methods for disinfectant use are not consistent with the field use	When reviewing TFC-ESHQ-IH-STD-14, the methods for disinfectant use are not consistent with the field use. Need to insure worker training and procedures are consistent with expected use of chemicals in the field.
5/3/2018	WRPS-PER-2018-1165	LERF facility is in need of housekeeping	LERF facility is in need of housekeeping. See: ETF2, ETF4, ETF6, ETF8, ETF9, ETF10, ETF13, ETF14, ETF15, ETF16, ETF17. Vegetation growing within CA boundary. See: ETF7 Package degradation on wrapped items. See ETF3 and ETF12 Grounding wire crossing radiological boundary from CA to RMA without being secured by radiological wire ties. See ETF20
5/3/2018	WRPS-PER-2018-1168	242-A Process Control Plan for EC-08, the AP-103 solids level measurement must be performed no later than 08/31/18.	Per RPP-PLAN-61925, Rev. 0, 242-A Process Control Plan for EC-08, the AP-103 solids level measurement must be performed no later than 08/31/18.

5/3/2018	WRPS-PER-2018-1169	Processed deferments for maintenance items in the past six (6) months	In reviewing the processed deferments for maintenance items in the past six (6) months, several observations were apparent. The Maintenance Department has been tracking the number of preventive maintenance (PM) deferments processed on a monthly basis. The process for completing a PM deferment is outlined in TFC-OPS-MAINT-C-12, Preventive/Predictive Maintenance Administration. Specifically, section 4.10 states:4.10Deferral of a PM ActivityNOTE: TSR, Environmental, and RadCon classified PMs cannot be deferred.When a PM cannot be worked, the Operations Manager determines whether the equipment or instrument may be left in the operable mode or whether the frequency should be changed. The Operations Manager or delegate will consult with engineering to determine whether a deferral is required. If a PM will be deferred, Engineering will prepare a Preventive Maintenance Deferral document in SPF in accordance with TFC-ENG-DESIGN-C-25. Include the Operations Manager as an approver and the PM Coordinator as a reviewer. To prevent the PM from exceeding the deferred date, the grace period will be subtracted from the late due date to determine the next due date.1.Identify the PM Phase Designator (e.g., TSR, ENV, RAD, BOP) to confirm the PM can be deferred. 2.Document the technical basis for the deferral in block 14. Justification on the Preventative Maintenance Deferral Form (SPF-009)3.Review and Approvalsa.Engineerb.Design Authorityc.Checkerd.Operations Managere.PM Coordinator - review only4.Level 1 Operations Manager approval is required for PM deferrals greater than 6 months, or for PMs being deferred for a second time without performance of the PM Activity.In December 2017 there were 15 total PMs deferred. In January 2018 there were 5 total PMs deferred. In looking at each individual deferment, the following items were noted: A. PMID ET-200731 had a due date of 5/1/2017, with the grace period expiring 5/30/17. The deferment PMID-DEF-4925) originated on 12/4/2017 and approved on 12/4/2017. The PM was deferred until 5/31/2018. Therefore, the PM deferred was processed over 6 months after the PM became delinquent (past the grace period expiring). Additionally, if a PM is deferred > 6 months Level 1 Operations Manager approval is required per TFC-OPS-MAINT-C-12 (see step 4.10.4 above).
5/3/2018	WRPS-PER-2018-1170	Processed deferments for maintenance items in the past six (6) months	In reviewing the processed deferments for maintenance items in the past six (6) months, several observations were apparent. The Maintenance Department has been tracking the number of preventive maintenance (PM) deferments processed on a monthly basis. The process for completing a PM deferment is outlined in TFC-OPS-MAINT-C-12, Preventive/Predictive Maintenance Administration. Specifically, section 4.10 states:4.10Deferral of a PM ActivityNOTE: TSR, Environmental, and RadCon classified PMs cannot be deferred.When a PM cannot be worked, the Operations Manager determines whether the equipment or instrument may be left in the operable mode or whether the frequency should be changed. The Operations Manager or delegate will consult with engineering to determine whether a deferral is required. If a PM will be deferred, Engineering will prepare a Preventive Maintenance Deferral document in SPF in accordance with TFC-ENG-DESIGN-C-25. Include the Operations Manager as an approver and the PM Coordinator as a reviewer. To prevent the PM from exceeding the deferred date, the grace period will be subtracted from the late due date to determine the next due date.1.Identify the PM Phase Designator (e.g., TSR, ENV, RAD, BOP) to confirm the PM can be deferred. 2.Document the technical basis for the deferral in block 14. Justification on the Preventative Maintenance Deferral Form (SPF-009)3.Review and Approvalsa.Engineerb.Design Authorityc.Checkerd.Operations Managere.PM Coordinator - review only4.Level 1 Operations Manager approval is required for PM deferrals greater than 6 months, or for PMs being deferred for a second time without performance of the PM Activity.In December 2017 there were 15 total PMs deferred. In January 2018 there were 5 total PMs deferred. In looking at each individual deferment, the following items were noted: B. There are 4 PMIDs (ET-108830, ET-108831, ET-008676, & ET-008677) that had a due date of 8/25/2017, with the grace period expiring 11/23/2017. The deferments (PMID-DEF-4928/-4929/-4931/-4932) originated 12/4/2017 and was approved on 12/14/2017, therefore, the deferment forms were generated after the PMs became delinquent. The PMs were deferred until 5/31/2018. Technically these PMs are deferred > 6 months (granted only by 1 week), and should have received Level 1 Operations Manager approval.
5/3/2018	WRPS-PER-2018-1171	Processed deferments for maintenance items in the past six (6) months	In reviewing the processed deferments for maintenance items in the past six (6) months, several observations were apparent. The Maintenance Department has been tracking the number of preventive maintenance (PM) deferments processed on a monthly basis. The process for completing a PM deferment is outlined in TFC-OPS-MAINT-C-12, Preventive/Predictive Maintenance Administration. Specifically, section 4.10 states:4.10Deferral of a PM ActivityNOTE: TSR, Environmental, and RadCon classified PMs cannot be deferred.When a PM cannot be worked, the Operations Manager determines whether the equipment or instrument may be left in the operable mode or whether the frequency should be changed. The Operations Manager or delegate will consult with engineering to determine whether a deferral is required. If a PM will be deferred, Engineering will prepare a Preventive Maintenance Deferral document in SPF in accordance with TFC-ENG-DESIGN-C-25. Include the Operations Manager as an approver and the PM Coordinator as a reviewer. To prevent the PM from exceeding the deferred date, the grace period will be subtracted from the late due date to determine the next due date.1.Identify the PM Phase Designator (e.g., TSR, ENV, RAD, BOP) to confirm the PM can be deferred. 2.Document the technical basis for the deferral in block 14. Justification on the Preventative Maintenance Deferral Form (SPF-009)3.Review and Approvalsa.Engineerb.Design Authorityc.Checkerd.Operations Managere.PM Coordinator - review only4.Level 1 Operations Manager approval is required for PM deferrals greater than 6 months, or for PMs being deferred for a second time without performance of the PM Activity.In December 2017 there were 15 total PMs deferred. In January 2018 there were 5 total PMs deferred. In looking at each individual deferment, the following items were noted: C. PMID ET-108708 is a 6 month check of the CAM Cabinet filter as an indication if the CAM cabinet is clean. This PM had a due date of 4/25/2017, with the grace period expiring 6/9/2017. The deferment (PMID-DEF-4926) originated 12/4/2017 and was approved on 12/14/2017. This PM has a frequency of every 6 months, yet was deferred until 5/31/2018, just short of 12 months from when the PM grace period expired. Again, PM's deferred > 6 months require Level 1 Operations Manager approval. In this case, the need for the deferment is not understood (the deferment form lists "Due to the possibility of freezing equipment this PM can not be done in winter months").

5/3/2018	WRPS-PER-2018-1172	Processed deferments for maintenance items in the past six (6) months	In reviewing the processed deferments for maintenance items in the past six (6) months, several observations were apparent. The Maintenance Department has been tracking the number of preventive maintenance (PM) deferments processed on a monthly basis. The process for completing a PM deferment is outlined in TFC-OPS-MAINT-C-12, Preventive/Predictive Maintenance Administration. Specifically, section 4.10 states:4.10Deferral of a PM ActivityNOTE: TSR, Environmental, and RadCon classified PMs cannot be deferred.When a PM cannot be worked, the Operations Manager determines whether the equipment or instrument may be left in the operable mode or whether the frequency should be changed. The Operations Manager or delegate will consult with engineering to determine whether a deferral is required. If a PM will be deferred, Engineering will prepare a Preventive Maintenance Deferral document in SPF in accordance with TFC-ENG-DESIGN-C-25. Include the Operations Manager as an approver and the PM Coordinator as a reviewer. To prevent the PM from exceeding the deferred date, the grace period will be subtracted from the late due date to determine the next due date.1.Identify the PM Phase Designator (e.g., TSR, ENV, RAD, BOP) to confirm the PM can be deferred. 2.Document the technical basis for the deferral in block 14. Justification on the Preventative Maintenance Deferral Form (SPF-009)3.Review and Approvalsa.Engineerb.Design Authorityc.Checkerd.Operations Managere.PM Coordinator - review only4.Level 1 Operations Manager approval is required for PM deferrals greater than 6 months, or for PMs being deferred for a second time without performance of the PM Activity.In December 2017 there were 15 total PMs deferred. In January 2018 there were 5 total PMs deferred. In looking at each individual deferment, the following items were noted: D. PMID ET-008799 had a due date of 8/25/2017, with the grace period expiring 9/24/2017. The deferment (PMID-DEF-4927) was originated 12/4/2017 and was approved on 12/14/2017, meaning the PM was deferred several months after it had become delinquent. The PM was deferred until 5/31/2018, which is > 6 months and did not have Level 1 Operations Manager approval.
5/3/2018	WRPS-PER-2018-1173	Processed deferments for maintenance items in the past six (6) months	In reviewing the processed deferments for maintenance items in the past six (6) months, several observations were apparent. The Maintenance Department has been tracking the number of preventive maintenance (PM) deferments processed on a monthly basis. The process for completing a PM deferment is outlined in TFC-OPS-MAINT-C-12, Preventive/Predictive Maintenance Administration. Specifically, section 4.10 states:4.10Deferral of a PM ActivityNOTE: TSR, Environmental, and RadCon classified PMs cannot be deferred.When a PM cannot be worked, the Operations Manager determines whether the equipment or instrument may be left in the operable mode or whether the frequency should be changed. The Operations Manager or delegate will consult with engineering to determine whether a deferral is required. If a PM will be deferred, Engineering will prepare a Preventive Maintenance Deferral document in SPF in accordance with TFC-ENG-DESIGN-C-25. Include the Operations Manager as an approver and the PM Coordinator as a reviewer. To prevent the PM from exceeding the deferred date, the grace period will be subtracted from the late due date to determine the next due date.1.Identify the PM Phase Designator (e.g., TSR, ENV, RAD, BOP) to confirm the PM can be deferred. 2.Document the technical basis for the deferral in block 14. Justification on the Preventative Maintenance Deferral Form (SPF-009)3.Review and Approvalsa.Engineerb.Design Authorityc.Checkerd.Operations Managere.PM Coordinator - review only4.Level 1 Operations Manager approval is required for PM deferrals greater than 6 months, or for PMs being deferred for a second time without performance of the PM Activity.In December 2017 there were 15 total PMs deferred. In January 2018 there were 5 total PMs deferred. In looking at each individual deferment, the following items were noted: Block 7 of the Preventive Maintenance Deferral Form has a typo that should be corrected. Block 8 reads "Date Grace Period Expites" and should state "Expires"
5/3/2018	WRPS-PER-2018-1175	Radeco air sampler rotometer was found Out Of Tolerance (OOT)	Radeco air sampler rotometer was found Out Of Tolerance (OOT)

5/3/2018	WRPS-PER-2018-1174	222-S Valve on airline spilled condensation on tile floor	Employee reported a small amount of water/condensate from an airline spilled on the tile floor in Room S3-A in manipulator repair shop when a worker opened valve CA-V-828.
5/3/2018	WRPS-PER-2018-1176	MBD monitoring of Evaporator Campaign EC-08 per TO-230-225	During The MBD monitoring of Evaporator Campaign EC-08 per TO-230-225 the EMB transfer information on the main screen and graph is not tracking with actual MBD readings. This is believed to be due to interpolation of the data points. The program only takes 200 data points for a single activity so as the activity extends out the time between data points stretches out. The system should show/graph the actual data points and update them every time the screen refreshes. On 4/21 it was noticed on the trending information screen that the MBD data showed out of range. The transfer OE notified the CSM and the evaporator of meeting a shutdown criteria and the evaporator was placed into recirculation. EMB Data Sheet 2 -"Routine Material Balance" were performed both manually and using the EMB system indicating that the MBD was only 650.3 gallons. The MBD was reset using a justification that the actual MBD remained within limits and the evaporator campaign resumed. Software Engineering identified a problem with a scaling factor of the information data and corrected the problem. The information data was improved but still did not track completely with the actual readings. Numerous manual calculations were performed to verify that the data on Data Sheet 2 was correct. Data Sheet 2 is the official record for MBD. As a result it was reinforced with the shift personnel that the trending information on the main EMB screen is not the official record and should not be used in determining if MBD limit was exceeded. It was also turned over from OE to OE as information on the transfer OE Turnover Sheet. Data Sheet 10 - Transfer Information Sheet did not communicate this information. If in question Data Sheet 2 readings can be performed either manually or using EMB to determine if the MBD is actually outside of limits. A request has been submitted to Software engineering to correct interpolation errors or eliminate interpolation and trend the raw data.
5/3/2018	WRPS-PER-2018-1178	242-A evaporator campaign EC-08 on two occasions the MBD was exceeded	During 242-A evaporator campaign EC-08 on two occasions the MBD was exceeded, one on 4/28 and the other on 4/29 (reference WRPS-PER-2018-1112 and WRPS-PER-2018-1121). These events are believed due to solids buildup on the AP-103 Enraf plummet and a floating solids layer in the tank. An attempt to calibrate the Enraf on 4/29 was unsuccessful due to solids build up. On 4/30 the plummet was flushed and successfully calibrated. Prior to 4/28 the Enraf was exhibiting sporadic behavior. After the flush the Enraf initially appeared to be performing better however after ~12 hours it continued exhibiting sporadic behavior. During plummet lift and weigh events it was evident that there were solids build up on the plummet. See attached photograph of plummet after campaign. During the previous campaign EC-07 the AP-104 Enraf was also exhibiting sporadic behavior and it is likely that it was due to the same cause. We discussed this issue with process engineering to determine if it was due to waste characteristic of the two campaigns. It was concluded that there was nothing out of the ordinary however the next campaign, EC-09, the feed came from similar source tanks and it likely that it will behave similarly.

5/3/2018	WRPS-PER-2018-1179	Monthly RMA inspection not completed	A review of RMA inspections at 222-S for the month of April 2018 identified that WRPS-RMA-131 was not inspected during the month. The custodian for this RMA works for the analytical prime contactor at 222-S (WHL).
5/3/2018	WRPS-PER-2018-1177	ETF HPT overtime unable to fill	On May 2, 2018 at approximately 1605, the ETF made an overtime request for (2) HPTs to work swing shift in support of the Thin Film Dryer room entry. When contacted, none of the ETF qualified HPTs who were signed up for swing shift over time accepted the overtime assignment. When contacted, none of the HPTs who were ETF qualified and who were not signed up (volunteers) for swing shift overtime accepted the overtime assignment. When the forced overtime list (lowest to highest seniority) of ETF qualified HPTs was called out there were HPTs who are assigned to the ETF (qualified) with lower seniority than the HPTs who were contacted for the forced overtime assignment. The lower seniority HPTs who are assigned to the ETF should have been forced to work the overtime assignment instead of the ETF qualified HPTs who were higher in seniority. This is not an isolated incident of HPT overtime call out issues at the ETF.
5/4/2018	WRPS-PER-2018-1181	ETF lacks adequate staffing to meet production goals and milestones.	For trending only: On Thursday, at the end of the day and work week, overtime was approved to perform on swing shift the investigation and repair of Thin Film Dryer hopper valve AOV-60J-155 and replacement of an air PRV. Several items of interest relating to this work are listed below. Ultimately the work lacked adequate preparation, staffing, knowledge and planning, but was successfully executed with some luck. Forced overtime. One individual was flying out of town on vacation that night. Package for PRV was not preworked initially Part for work package was not available so a material coordinator had to be called out. Field work supervisor was not from the ETF facility and did not know where the material was. No bill of material was with the package for the replacement part Not enough PAPRs for the eetry into the Thin Film Dryer (they had been mostly used up during the week) and none replaced No NCO coverage for the OT maintenance work. SOM delegated two from oncoming C Shift. Fitters not comfortable with replacing PRV after material was obtained. Craft were borrowed craft (not from the facility) Field work supervisor had to leave and turned supervision over to recently FWS qualified electrician who was new to the facility No second LOTO CO for partial removal of LOTO to support functional test of the AOV-60J-155 valve

5/4/2018	WRPS-PER-2018-1182	ETF facilities management needs to give clear tasking for the full qualification for ETF shift NCO's.	The qualifications on shift are not defined so in result only a very small group of NCO are getting fully qualified which doesn't allow the ability to keep shifts properly staffed. The NCO's that have all the qualified are left to do the bulk of the work and Overtimes are not being filled.
5/7/2018	WRPS-PER-2018-1183	The dry erase board in 2704-HV G110 came off of the wall during the morning HPT briefing	The dry erase board in 2704-HV G110 came off of the wall during the morning HPT briefing. The board swung by one bracket and struck an HPT in the head and neck, resulting in a small visible cut to the neck.
5/7/2018	WRPS-PER-2018-1184	242-A operations was unable to start pump PB-2	On 5/3/18, 242-A operations was unable to start pump PB-2. A MCS modification for PB-2 had been performed previously that day via work order #311357. The modification has apparently changed a parameter preventing pump start-up. As a result of this, the slurry line flush called out in TO-650-140, Flush 242-A Evaporator Vessel, Recirculation Loop and De-Entrainer Pads, was not completed fully. The slurry line had been flushed with 500 gallons of water on 5/2/18 at the completion of waste processing however. Engineering required to determine cause of failure of PB-2 start-up. Engineering evaluate post campaign EC-08 slurry lines flushes.

5/7/2018	WRPS-PER-2018-1185	Performed a Walk you Space MOP of A Complex.	Performed a Walk you Space MOP of A Complex. Performed a Walk you space MOP for A Complex using the MOP performed by (b)(6) on 3/26/18. The same issues with house keeping and tumbleweeds are still there. Here are the issues noted during my MOP and the MOP performed by (b)(6) 2.A Farm - Mound inside needs posting stood up 3.A Farm - Electrical equipment dispose of or cover to protect from elements 4.A Farm - Southeast corner in need of housekeeping 5.AX Farm - Plastic window coverings has fallen off exterior of change tent (Corrected) 6.AX Farm - Lead blankets severely deteriorated by weather 7.AX Farm - East side at bottom of hill - WRPS-RMA-103, separate RMA number sign and RMA posting sign (Corrected) 8.AX Farm - East side at bottom of hill - WRPS-RMA-103, signs need new clips some are damaged - rehung signs. (Corrected) 9.A Farm - West side vehicle gate tumbleweed removal 10.AY Farm - North AY-2 change trailer needs housekeeping 11.AY Farm - North AY-2 change trailer, caution tape near UT Trailer needs to be replaced of removed 12.AZ Farm - AZ102 - Covered riser near AZ102-WSTA-TBX-153, weather cover needs to be replaced, it is badly deteriorated 13.A Complex - Decontamination Trailer could use a general housekeeping 14.204-AR Underground signs need new clips Pictures can be located at WRPS-MOP-2018-1383.
5/7/2018	WRPS-PER-2018-1186	Lack of efficient processes to respond to and repair of identified damage conditions to asbestos containing materials.	Lack of efficient processes to respond to and repair of identified damage conditions to asbestos containing materials. Periodic surveillance of all ACM.
5/7/2018	WRPS-PER-2018-1187	Odor persists at 616 (600 Area) Waste Operations facility.	Odor persists at 616 (600 Area) Waste Operations facility. The odor has been a problem since before the issue was submitted as an EAPC Safety Book concern on 3/8/18. Odor seemed to be exacerbated by warm weather at the time. Septic was pumped after many years (unknown timing) of not being pumped. MSA is creating a PM for a regular pump interval. Extensions were added to septic roof vent pipes and charcoal caps were added. The odor problem still has not been resolved and offensiveness fluctuates from notable to very significant. Maintenance is currently working the issue and a smoke test has been scheduled for 5/11/18 to reveal any leaks in the sewer piping. There are concerns of hazardous air quality, and ongoing troubleshooting; suspect issue with HVAC and/or septic system. Source unknown.

5/7/2018	WRPS-PER-2018-1188	222-S Contract Submittals for 242-A Evaporator work	The submittals for Contracts #54304, 59726 and 55512 are not in Smartplant. These contracts were and are for off-site laboratory series in support of the 242-A Evaporator.
5/7/2018	WRPS-PER-2018-1190	242-A GFCI PM, a faulty GFCI caused a circuit breaker to trip, in a Panel board in another room.	On 05/01/18, during a routine monthly GFCI PM, a faulty GFCI caused a circuit breaker to trip, in a Panel board in another room. The tripped circuit breaker also supplied power to the facilities HLAN connected systems, which all then went off-line. Maintenance personnel identified the tripped breaker was the result of the faulty GFCI. The GFCI and the tripped circuit breaker were reset, and power was restored to the facility HLAN systems.
5/7/2018	WRPS-PER-2018-1189	Internal Assessment of Temporary Shielding request for documents	Internal Assessment of Temporary Shielding request for documents from Rad Con Company technical authority for the annual assessment was completed but results not documented utilizing the Assessment Tracking System or Interoffice Memo as required by TFC-ESHQ-RP_MONC-12.

5/7/2018	WRPS-PER-2018-1191	ETF Lapel Air Sampler issue	During entry into the Thin Film Dryer Room (TFDR), which is a posted Contamination Area (CA) / Airborne Radioactivity Area (ARA), a Lapel Air Sampler being worn by one of the four workers, quit running after approximately nine minutes. Upon counting the air sample from the lapel air sampler that ran properly, the net count rate was less than the DL (Decision Level). Upon counting the air sample from the lapel air sampler that stopped running, the net count rate was less than the DL (Decision Level). In addition, the air samples that were taken during the job all resulted in less than 20% of a Derived Air Concentration (DAC).
5/8/2018	WRPS-PER-2018-1180	Emergency Preparedness Drill -SOEN messages, which are required per TFC-OPS-OPER-C-57 Event Notification, were discussed but	On 3/29/2018, WRPS Security and Emergency Services (SES) conducted an emergency preparedness drill to evaluate emergency response actions involving a catastrophic failure of the process condensate tank TK-C-100 in the 242-A Evaporator that impacted the Tank Farms and 242-A Evaporator. During the course of the drill, the evaluation team identified the following "Suggestion" which pertains to EP-Program Element 10 "Notifications and Communications". SOEN messages, which are required per TFC-OPS-OPER-C-57 Event Notification, were discussed but never disseminated.
5/8/2018	WRPS-PER-2018-1192	Crane Rack Systems not put to use	A new rack system was built into the cranes to allow for the carri-air rack to be hung in such a way that the bottle and rack do not interrupt the crane operator. The hanging rack was installed with approval from the manufacturer, WRPS and MSA. It was determined in a meeting with MSA, WRPS and AMEC to be the safest way to operate cranes while using supplied air. Since the implementation it has been identified that some operators of cranes are still using a method that was considered to be an interim practice until the racks were installed due to safety concerns. It is my belief and the belief of others that we installed and implemented the use of hanging racks to eliminate the need for carri-air systems under the operator's feet or for a line tender outside the cab in the fall zone. It is also my belief and the belief of others that putting another body into the fall zone and into the slewing radius of the crane is creating an unnecessary hazard. I am concerned with a line tender; following the crane as it swings, walking over and around equipment and systems in the farm as the crane swings and for the possibility for the respirator seal to fail if the hose were to be caught as the crane swings. My concern is that the operator has to not only watch the load, radius, boom etc. and having to also watch a line tender outside the crane is not a safe practice. This also goes against the current ALARA practice at WRPS by putting another body (line tender) into a potential dose area. I also believe that the methods used to transport the carri-air using the line tender method has unnecessary hazards as well. The current practice is to set the carri-air in an unsecured manner on the deck of the crane as it travels through the farms.

5/8/2018	WRPS-PER-2018-1193	Fluke Out of Cal	Fluke Documenting Process Calibrator, Model# 754, Serial# 2995013 (M&TE # 820-13-20-007) "As Found" reading during calibration was Out-Of-Tolerance. It was adjusted to manufacturer spec.
5/8/2018	WRPS-PER-2018-1194	Electronic Information Citations	Electronic Information Citations in the Editorial Standard and Format Guidance for Documents, TFC-BSM-AD-STD-02, are out of date and overly burdensome. Links in a document: The MSA procedure MSC-PRO-RM-184 requires that internal links and their textual displays need to be removed from public documents, as opposed to TFC-BSM-AD-STD-02 that requires such links. It is not possible to publish a document with the current TFC-BSM-AD-STD-02 requirements. Citations of values from a database: Most reference types in a document allow for a short form reference to be included in the text of a document, and the full reference to be included in the reference section of the document. For example, a "Technical Document" allows for a first citation in the text of the document to use the document number and title and the full citation only required in the reference section of the document. There is no such allowance for a value(s) from a database. Current implementation of TFC-BSM-AD-STD-02 requirements uses the full reference form in both the text and reference section of the document. This significantly hinders the ability to read the technical document, with the citation dominating the body of the document and distracting from the text of the paragraph. Only a brief, short form citation is needed in the body of the document. Full citations in the text of a document is beyond reasonable.
5/8/2018	WRPS-PER-2018-1195	Proto Torque Wrench	Proto Torque Wrench, Model# 6008CX, Serial # DHG94370 (M&TE # 817-88-01-067) "As Found" reading during calibration was Out-Of-Tolerance. It was adjusted to manufacturer spec.

5/8/2018	WRPS-PER-2018-1196	Evaporator Campaign EC-08	During Evaporator Campaign EC-08, slurry pump PB-2 was started and stopped numerous times due to issues impacting continuous slurry out operations. Some of the times while attempting to re-start PB-2, the VFD faulted, preventing the pump from starting. The faults were reset and the pump subsequently started and operated SAT.
5/9/2018	WRPS-PER-2018-1045	Work Order updated after being Ops Accepted	Work Order #262463 had been Ops Accepted on 03/01/18. Over a month later, on 4/12/18, pen and ink changes were entered into the work instructions by (b)(6) The entries, both pen & ink and the associated work record entries associated were not performed according to procedure direction found in TFC-OPS-MAINT-C-01, TOC Work Control, Section 4.7 Work Order Changes. The Pen & Ink entries were made to steps that had (b)(6) signature from April of 2017, making it look like (b)(6) had signed for inspection/verification of equipment that was not part of the inspection performed in 2017. (b)(6) work record entries were not properly approved in accordance with the requirements of TFC-OPS-MAINT-C-01.
5/9/2018	WRPS-PER-2018-1197	Scheduled Radiation Survey Task Description (LE-W098) at ETF, numerous (9) contaminated tumbleweed fragments were discovered.	During the performance of a Scheduled Radiation Survey Task Description (LE-W098) at ETF, numerous (9) contaminated tumbleweed fragments were discovered. Total Contamination of; Soil Contamination Area East of Basin 44 Contamination Area: Location # 1: 115,500 dpm/100 cm2 Beta-Gamma and <500 dpm/100 cm2 Alpha, Location # 2: 93,000 dpm/100 cm2 Beta-Gamma and <500 dpm/100 cm2 Alpha Location # 3: 88,700 dpm/100 cm2 Beta-Gamma and <500 dpm/100 cm2 Alpha Locations #4-9: 15,600 - 47,870 dpm/100 cm2 Beta-Gamma and <500 dpm/100 cm2 Alpha No removable contamination was detected. The fragments were properly disposed of.. Survey results are documented in Survey Simple on survey # LE-1800915.

5/9/2018	WRPS-PER-2018-1198	tumbleweeds completely covered a small RMA # RWPS-RMA-178 containing a lone "Gang Box" preventing technicians	tumbleweeds completely covered a small RMA # RWPS-RMA-178 containing a lone "Gang Box" preventing technicians from performing weekly surveillance. Several attempts during the week were made to have tumbleweeds removed ST team with no success.
5/9/2018	WRPS-PER-2018-1199	Line drawing does not match field conditions during outage PM.	Discovered One-Line drawing does not match field conditions during outage PM. Attached is a marked up copy of one of the drawings.
5/9/2018	WRPS-PER-2018-1201	Hi volume air samplers cord inspection not performed	Hi volume air samplers were procured by the ETF and calibrated (used) by the Instrument technicians prior to the performance of their electrical cord inspection in accordance with 5-MISC-299. The equipment electrical cord inspection was not performed prior to use.

5/9/2018	WRPS-PER-2018-1202	Orion Conductivity Meter, Model # STAR A122, Serial# H04887 (M&TE # 817-45-70-008) "As Found" reading	Orion Conductivity Meter, Model # STAR A122, Serial# H04887 (M&TE # 817-45-70-008) "As Found" reading during calibration was Out-Of-Tolerance. it was adjusted to manufacturer spec.
5/9/2018	WRPS-PER-2018-1203	In EAM Preventative Maintenance items are showing up overdue prior the dates that they are really overdue.	In EAM Preventative Maintenance items are showing up overdue prior the dates that they are really overdue. Specific example is Retrieval Shop Quarterly Portable Tool Check (2nd Quarter), which is for months April, May and June, it shows overdue on May 22, this should not be overdue until June30th. This may be a similar issue to PER-2018-1321.
5/9/2018	WRPS-PER-2018-1204	An AEI Pipe fitter was in AX farm when they accidentally doffed their regulator after removing their hood in a CA.	An AEI Pipe fitter was in AX farm when they accidentally doffed their regulator after removing their hood in a CA. Radcon performed surveys which were negative for contamination. IH monitoring in the area identified no concern for chemical exposure during the entire work evolution.

5/9/2018	WRPS-PER-2018-1205	222S-AOP-115 management expectations not incorporated	222-S management expectations are not incorporated in procedure 222S-AOP-115 to complete form A-6006-551, 222-S Odor/Spill Response & Investigation form.
5/9/2018	WRPS-PER-2018-1206	222-S Out of Service Tag requirements not being met	222-S Out of Service Tag program is not meeting requirements set forth in ATS-310, Section 2.21 Use of Equipment Control Tags and Labels, 4.8 Out-of-Service Tag, and 4.11 Tag Surveillance.
5/9/2018	WRPS-PER-2018-1207	AW Primary Exhauster (296-A-47) unplanned shutdown	B Train of the AW Primary Exhauster (296-A-47) experienced an unplanned shutdown.

5/9/2018	WRPS-PER-2018-1208	TFC-OPS-OPER-C-08 and TFC-OPS-OPER-C-13	TFC-OPS-OPER-C-08 and TFC-OPS-OPER-C-13 provides verbiage for a trained and qualified operator to perform activities without direct supervision or a procedure in hand. TFC-OPS-OPER-C-08; Appendix "The following is a list of routine activities that can be performed without authorization from the Shift Manager. TFC-OPS-OPER-C-13; Section 4.16 NOTE 1 After system/component startup, a qualified operator or operator trainee, under the supervision of a qualified operator, will perform routine minor adjustments to controls, as necessary, to maintain stable conditions, and can perform these activities without direct supervision or a procedure. In discussion with Operations managers across the WRPS complex, many operating procedures invoke the verbiage of flexibility from TFC-OPS-OPER-C-08 and TFC-OPS-OPER-C-13. A review of this verbiage is warranted to ensure consistency with DOE O 422.1 requirements and TFC-PLN-05 implementation.
5/9/2018	WRPS-PER-2018-1209	ETVS and timekeeping procedure contradict each other	ETVS and timekeeping procedure contradict each other, forcing an employee to concur with a change made by payroll that was an ETVS delta of 0 to an ETVS delta of .1 and being red. Our procedure TFC-BSM-AC-C-01, REV A-25 in 4.6 section 3 Verification of TIS Entries Using ETVS Custom Application (CA) reads " If the ETVS CA Delta field is other than zero, either: a. Correct the TIS entry to eliminate the discrepancy or b. Explain the specific situation in the comment section of TIS. If a comment is not provided to explain the discrepancy, the manager will reject the TIS time card. This is the 3rd PER I have written to get this situation addressed. The ETVS Rounding Table and the ETVS clock/software do not match. I cannot concur with a timecard change by payroll that causes my ETVS Delta to be anything other than zero, because I would then be falsifying my timecard. ETVS is supposed to help with timecard fraud, but it is nothing but a giant hassle for employees because the rounding chart is incomplete due to xx:58-xx:03 being your 1/10 of an hour. If you clock in at 06:03:01 seconds you are into your 4th minute of work for that day and using .1 ptb. The rounding chart makes it seem like if the time clock says 06:03 that you are still logging TIS in at 06:00, yet your ETVS delta would be red and 0.1. Same goes if you leave early every day. If you leave after 4:27:01 seconds you TIS at 4:30, if you leave at 4:21:01 that would be a full 1/10th of an hour .1 ptb, but payroll rejects that and says you have to wait until 4:22:01 to clock out to get .1 ptb. 4:21:01 is the 22nd minute of the hour, not 4:22:01. Realizing that payroll doesn't deal in seconds, ETVS does.
5/10/2018	WRPS-PER-2018-1212	Water from Conduit.	While removing a condulet cover from a underground conduit, water was seen flowing out of cover. WO-349638 (241-AX Excavate & Install Conduits & Hand Holes

5/10/2018	WRPS-PER-2018-1211	B Complex Contamination	*** Compliance Issue - Contamination Outside a Posted CA *** While performing the monthly routine perimeter survey of B-Farm, numerous small spots of contamination were identified on the perimeter of B-Farm. Initially contamination was found within 5 feet of the northeast corner outside B-Farm. After getting more HPTs help to perform surveys, the small spots of contamination were discovered all along the entire east fence line within 5 feet of the fence and approximately (5) spots 10-25 feet away from the east fence line. They also found (3) spots along the south fence line and approximately (20) spots on the south end of the west fence line. No alpha contamination, no transferrable contamination, and no removable contamination was detected at any of the locations. The areas were deconned and/or posted as follows: 1. South Fence Line a.2.3 million dpm/100cm2 – Spot was cleaned up to 70,000 dpm/100cm2 and left posted CA b.60,000 dpm/100cm2 – Spot was cleaned up c.50,000 dpm/100cm2 – Spot was cleaned up 2. West Fence Line a. Approximately (20) spots ranging from 1,000 dpm/100cm2 to 100,000 dpm/100cm2 – Area was posted CA 3. East Fence Line - (>10 feet away from the fence) a. (5) spots ranging from 10,000 dpm/100cm2 to 400,000 dpm/100cm2 – These (5) spots were cleaned up 4. East Fence Line - (<10 feet away from the fence) a. 900,000 dpm/100cm2 – Spot was cleaned up to 8,000 dpm/100cm2 and left posted CA. b. 500,000 dpm/100cm2 – Spot was cleaned up to 30,000 dpm/100cm2 and left posted CA. c. Approximately (15) spots ranging from 1,000 dpm/100cm2 to 60,000 dpm/100cm2 were posted CA along the entire East fence line All the readings were direct readings with the dirt/tumbleweed mixture on the ground. There was no evidence of animal feces and no discoloration or any evidence of animal urine.
5/10/2018	WRPS-PER-2018-1217	Staff Augmentation	We have staff augmentation employees we wish to bring on as direct employees. There appears to be no process to describe how to do this. Procedures describe bringing on the staff aug and then what happens at the termination of their contract. Staff procedure only describes hiring direct employees, but not bringing on temporary employees as permament. Since WRPS frequently uses staff aug personnel, and they get hired permamently more often than not, it makes sense to address this. In addition, staff aug personnel have already been screened against other candidates, interviewed, badged, taken HGET, performed EJTA, have e-mail, IDMS, and popfon accounts, and have already been trained in the job they will be taking. It makes sense that hiring staff aug as direct hires could be simple and fast-tracked in order to keep managers and the staff aug from performing steps that have already been performed and from losing valuable time.
5/10/2018	WRPS-PER-2018-1218	222-S Room 4S Remodel Filter Housing Incident	On 5-9-2018 while working in Room 4-S, removing two fume hoods (approx. wt. 750 lbs. ea.) the work crew may have disturbed some samples left on the countertop. The room owners were aware of the hood removals. During lunch break the room owners set out samples on the countertop near where the hood removal was being performed. As work continued on the hoods the samples may have been disturbed. The room owners claimed the samples a loss because the "order" was no longer recognizable. The samples were not uniquely identified. Failure to identify each sample was the cause for the loss of the samples not the hood removals

5/10/2018	WRPS-PER-2018-1219	Missed Fire Extinguisher Inspections	The fire extinguishers at the front and rear entrances of Building 1820TD did not receive a monthly inspection during April 2018.
5/10/2018	WRPS-PER-2018-1220	Duplicate of WRPS-PER-2018-1219	The fire extinguishers at the front and rear entrances of Building 1820TD did not receive a monthly inspection during April 2018.
5/10/2018	WRPS-PER-2018-1221	Energized Heat Trace Wire	At approximately 1000 on 10 May 2018 an energized heat trace wire was severed while performing WO 362823 (DRAIN/ISOLATE 241-C –FARM WATER SKIDS/MANIFOLDS). (b)(6) was (b)(6) associated POR299 water skid per step 5.10.4 of the work package when he heard a "POP" and noted a burn mark on (b)(6) . He immediately informed his supervisor and placed the work area in a safe condition. NO personnel injury occurred as a result of this event..

5/11/2018	WRPS-PER-2018-1222	ETF Leak Camera/TV in the Control Room	Just prior to TFD Room entry, a leak on the Camera/TV in the Control Room coming from above camera view started. Same leak as described in Shift Turnover on 4/29/18 Dayshift. SOE and RCT identified leak increasing at 2330hrs in TFD Room. Had camera and took a combination of stills and video to view leak area. Believe leak is coming downstream of 60J-120. Due to Insulation on piping cannot pinpoint exact leak location. Facility Mgr. is contacting Planning Mgr. to write a WO for building scaffold and removal of insulation. Management is also requested a L/T be written ahead of WO Prep.
5/11/2018	WRPS-PER-2018-1224	AP Farm LOTO issue	While performing safe to work check in Enclosure AP241-VTP-ENCL-110 under WO# 395410 the electricians found presence of voltage being backfed from a UPS in that same Enclosure.
5/12/2018	WRPS-PER-2018-1225	ETF Valving issue	Heard and noticed air coming out of the top of valve PR-AOV60A083.

5/14/2018	WRPS-PER-2018-1227	Make RAD instruments tracked by one label.	At ETF two labels are used to track most RAD instruments used by different groups. EIN for smart plant and a RAD ID. This can cause confusion and is an HPI issue for track and use of instruments.
5/14/2018	WRPS-PER-2018-1200	drawing H-2-94668 Sheet 3 Revision 2 has not been updated	While checking ECN-714228, it was discovered that drawing H-2-94668 Sheet 3 Revision 2 had not been updated to show the correct "As-Found" condition of building 2752-E. It was noted that there had been a previous ECN issued, ECN-11-000334, to revise drawing H-2-94668 to reflect these updates. ECN-11-000334 was marked as "Work Completed" on 2/17/2011. ECN-714228 shows "As Found" and "Is" condition of H-2-94668 Sheet 3 has not been verified, except that which applies to this project and shall not be relied upon for future or current condition.
5/14/2018	WRPS-PER-2018-1229	Fleet asset records review	Performed review of all current Fleet asset records in EAM (944 total) to review completedness and accuracy of data entry. I reviewed both individual data fields that were blank/null (highlighted in yellow in attachment) as well as combinations of fields for accuracy of data (highlighted in orange in attachment). NOTE: Not all fields that are blank/null will contain data (e.g. license plate. gps, etc.), but if no data is available, "N/A" should be entered.The following discrepancies were identified:BLANK FIELDS: - Manufacturer - 23; - Model - 8; - VIN/Serial Number - 3; - License Plate - 203; - GPS Asset Tag - 86; - Asset Custodian - 5; - Acquisition Type - 378; - Assigned Manager - 105; - Base Location - 73; - CACN - 87DATA REVIEW: - Status = "Out of Service" + GPS Asset Tag is not null/blank - 18 - Custodian = "(b)(6)" + Acquisition Type = "GSA..." - 1 - Custodian = "(b)(6)" + Acquisition Type = "Agency Owned", "DOE Owned" or "Commercial Rental" - 28

5/14/2018	WRPS-PER-2018-1230	222-S Facility configuration change without direction and no procedure utilized	The package WO-363054 for exhaust fan up grades was being change to reflect putting HP-1 back in service. It was turned off Tuesday for working the upgrade package. While this was being done someone had turned HP-1 on. SOE's are responsible for turning HP-1 on and Off and it is by procedure ATS-LO-161-164. . They were waiting for the work package to be changed so they could put HP-1 back in service. Concern would be someone performing work that is not authorized and performing an action that put the configuration of HP-1 different than package wanted. Also this action was performed without a procedure. If you do not use a procedure for performing the work either equipment could be damaged and or your operating equipment that is not yours to operate.
5/14/2018	WRPS-PER-2018-1231	neither the calibration nor operating procedures have provisions for tagging an instrument out of service when found with an	During a causal analysis associated with WRPS-PER-2018-0752 it was noted that neither the calibration nor operating procedures have provisions for tagging an instrument out of service when found with an expired calibration or upon failing calibration.
5/14/2018	WRPS-PER-2018-1232	AZ101-WSTA-LDT-151 (R90) taken out of service	AZ101-WSTA-LDT-151 (R90) taken out of service to allow Ultrasonic Testing of AZ101 DST . OSD-T-151-00031 requires PER to be submitted within 7 calendar days of failure to obtain a required reading.

5/14/2018	WRPS-PER-2018-1233	Unplanned shutdown of portable exhausters POR-126 and POR-127.	Unplanned shutdown of portable exhausters POR-126 and POR-127.
5/14/2018	WRPS-PER-2018-1234	T-Farm, TX/TY-Farm and U-Farm, housekeeping issues	1. During the performance of Walk Your Spaces for T-Farm, TX/TY-Farm and U-Farm, housekeeping discrepancies were observed for tumbleweed accumulation and litter/debris. 2. Resources need to be applied to remove tumbleweeds from the interior and exterior of respective farms. 3. Resources need to be applied to remove litter/debris from the interior and exterior of respective farms.
5/14/2018	WRPS-PER-2018-1235	Donning and Doffing Instructions need to be in clear line of sight for reference use	1. No Donning & Doffing Instructions of PPE are currently provided for guidance in MO-817 Change Trailer. Donning and Doffing Instructions need to be in clear line of sight for reference use. No additional discrepancies identified.

5/15/2018	WRPS-PER-2018-1226	EIN labels not being installed on new equipment as required by TFC-ENG-STD-12	It appears there is not a clear process to ensure labels per TFC-ENG-STD-12, Tank Farm Equipment Identification Numbering and Labeling Standard are affixed to newly installed equipment in the farms. The outcome of 2018-0626 found what appears to be a gap in the process for ensuring the correct labels are created for new equipment that is installed in the farms. Emails attached as supporting evidence suggest the following opinion: 'Most of the time when equipment is installed into a tank farm without proper labeling it usually stems from projects not enforcing the standard to outside vendors supplying equipment such as exhausters. The disconnect is that to print a label that conforms to TFC-ENG-STD-12, WRPS needs to print it. WRPS needs to print them and provide them to the vendor or replace the vendor installed labels with TFC-ENG-STD-12 compliant labels as the equipment arrives on site. This is not how the contracts with vendors have been written in the past.' I have questioned several individual's working for and with projects, AN Team, the commissioning department who ensures the process for operational readiness is followed and no one seems to think their group is where the breakdown has occurred. There needs to be a well defined process to ensure labels are installed on new equipment in accordance with STD-12 at the time the equipment is installed in the farm.
5/15/2018	WRPS-PER-2018-1210	C-Farm laundry bags were stacked higher than the height identified in procedure	From MOP WRPS-MOP-2018-1386, one corrective action was identified at the C-Farm connex (1241). The laundry bags were stacked higher than the height identified in procedure, TFC-ENG-STD-01, REV A-7, 4th Bullet (65").
5/15/2018	WRPS-PER-2018-1237	Workers not wearing Scott Carri-Air respiratory equipment properly.	Observed Workers not wearing Scott Carri-Air respiratory equipment properly.

5/15/2018	WRPS-PER-2018-1238	MO822 Upper C farm change trailer has stairs going into C farm that are not to code.	MO822 Upper C farm change trailer has stairs going into C farm that are not to code. Per NFPA 101- The landing adjacent to the egress door and building floor shall be within 1/2 inch of the floor level. MO822 landing is 1.5 to 2 inches lower than floor level.
5/15/2018	WRPS-PER-2018-1242	222-S Ventilation Upset Investigation	Up grades to the ventilation ACM system was being performed when during the process it caused the exhaust fans to come on line. They were off but in the Auto mode configuration for a upgrade preparing to worked. To perform the work properly the configuration of the exhaust fans should have been in the off position.
5/16/2018	WRPS-PER-2018-1243	Non-Reportable Contaminated Bird Feces Discovered at ETF	During the performance of a Scheduled Radiation Survey Task Description (LE-D012) at ETF, spots of contaminated bird feces were discovered. Total Contamination of; Surge Berm (Radiological Buffer Area): Location # 1: 4,500 dpm/100 cm2 Beta-Gamma and 7 dpm/100 cm2 Alpha, Verification Berm (Non-Rad Area): Location # 2: 9,000 dpm/100 cm2 Beta-Gamma and 7 dpm/100 cm2 Alpha No removable contamination was detected. The locations were deconned. Survey results are documented in Survey Simple on survey # LE-1800962

5/16/2018	WRPS-PER-2018-1239	241-C-301 sludge Weight Readings	Field sludge weight level readings were recently taken under WO-381582 on 5/11/2018 at catch tank 241-C-301 through Riser 3 . The total waste level was approximately 66.3 inches (approx. 13,000 gal.). Of this amount the liquid level was approximately 59.5 inches (approx. 11,500 gals.) and the solids level was approximately 6.8 inches (approx. 1,300 gals.). However an earlier report , RPP-RPT-42231, Rev 1, released in May 1985, discussed that the total waste level in 241-C-301 was 53.5 inches (approx. 10,486 gal.). See pages 6, 8,9, 10, and 11. Current observations show this tank contains less solids than suggested by the process record and that the current liquid level has increased possibly due to rainwater intrusion into this tank since 1985. The tank's liquid level is not currently monitored. During the review it was also noted that document RPP-RPT-42231, Rev.1, Section 2.2 for 241-C-301 noted drawing H-2-1750. The drawing reference for 241-C-301 should be H-2-1762.
5/16/2018	WRPS-PER-2018-1244	Non-reportable Contaminated Tumbleweeds Discovered at ETF	During the performance of a Scheduled Radiation Survey Task Description (LE-W062) at ETF, a contaminated tumbleweed was discovered. Total Contamination of; Near the LERF Catch Basins 42 & 43 (Soil Contamination Area): Location # 1: 36,820 dpm/100 cm2 Beta-Gamma and 14 dpm/100 cm2 Alpha, No removable contamination was detected. The tumbleweed was properly disposed of. Survey results are documented in Survey Simple on survey # LE-1800956
5/16/2018	WRPS-PER-2018-1245	ETF RadCon Survey Plans Not On Share Drive	HPT's at WRPS are required to use release plans through the site. Rad Con has a page on the computer that is accessed by all to find these RSP's. Two are missing. They are for ETF work scope. PO-RSP-2016-024 Forklift at ETF and 2016-PO-011 Drums out of the Thin Film Dryer Room. These are kept on a private drive.

5/16/2018	WRPS-PER-2018-1246	Wipes are not provided at PCM's to sanitize between user for hygiene purposes	**Wipes are not provided at PCM's to sanitize between user for hygiene purposes.** This issue has been in an EAPC Safety Book for 60 days, and is currently being worked.
5/16/2018	WRPS-PER-2018-1241	EDARFs could be found in the ETF procedure field binder	There were five Electronic Document Acceptance Review Forms (eDARFs) that had been submitted and should have appeared in the ETF-60M-007 field binder folder to communicate the changes made to the procedure. Only two (EDARFs) could be found in the procedure field binder. Three eDARDFs were omitted from the procedure field binder.
5/16/2018	WRPS-PER-2018-1240	Valve label missing at ETF	(b)(6) were working to remove (pump) rain water from the basin 42 cover when it was realized that one of the valves that they needed to operate did not have a label. When (b)(6) performed an inspection they found two other valves that had their numbers (label) written on masking tape with a sharpie. This does not met Engineering Standard ENG-STD-012. The work was paused while (b)(6) made labels that still did not meet Engineering Standard ENG-STD-012 and attached the labels to the valves.

5/16/2018	WRPS-PER-2018-1248	Compliance Team corrections for the time period of 03/26/18 thru 05/15/18	-Compliance Team corrections for the time period of 03/26/18 thru 05/15/18- 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: 1) It was reported that a CA sign on a Riser on Tank 111-BX was faded and needed to be replaced. 2) It was reported that a CA sign on Tank 105 in T-Farm was broken and needed to be replaced. 3) I t was reported there was an HRA/CA sign on a Manhole Cover on Tank 101 in T-Farm that was faded and needed to be replaced. 4) It was reported that there were a couple of signs on C-Farm Vehicle Gate (RA/CA and URMA) that were faded and needed to be replaced. 5) It was reported that there were several signs located in the Green Field, between AN-Farm and C-Farm, (URMA, RA) that were faded and needed to be replaced. 6) It was reported that there were a couple of (WRPS-RMA-181) signs that were destroyed and need to be replaced. 7) It was reported that there were several (WRPS-RMA-193) signs that were faded/destroyed and needed to be replaced. 8) It was reported that there were several Tumbleweeds in B-Farm and that they needed to be picked up. 9) It was reported that there were a few signs around the exterior of AP-Farm (RA, URMA, RBA, CA) that were faded/Temporary and that they needed to be replaced. 10) It was reported that there were a couple of signs around the exterior of AW-Farm (URMA, RBA) that were faded/Temporary and needed to be replaced. 11) It was reported that there were several signs around the exterior of C-Farm (RA/CA, Area not Routinely Surveyed, RBA) that were missing/faded and needed to be replaced. 12) It was reported that there were a few (WRPS-RMA-099) signs that were faded and needed to be replaced. 13) It was reported that there were several Tumbleweeds in SX-Farm and they needed to be picked up. 14) It was reported that there were several signs inside C-Farm/CR-Vault (RA/CA, RMA/RBA, Area not Routinely Surveyed) that were faded/Broken and needed to be replaced. 15) It was reported that there were a couple of signs in TX-Farm (CA) that were faded and needed to be replaced. 16) It was reported that there were Tumbleweeds in Various CA'S around ETF that needed to be picked up. 17) It was reported that there were a few signs on WRPS-RMA-012 (RMA) that were faded and needed to be replaced. 18) It was reported that there were several Tumbleweeds in BX-Farm and that they needed to be picked up. 19) It was reported that TX-Farm had two CA boundaries (TX-101 and TX-115) that were degraded and needed to be replaced with Rad-Chain. 20) It was reported that there were several signs (Buried Dangerous Waste pipe) that were faded and needed to be replaced on WIDS line 600-269-PL. 21) It was reported that there were several signs (CA) on Tank 101, 115, and 118 in TX farm there were faded/Temporary and needed to be replaced. 22) It was reported that there was Rad-rope on WRPS-RMA-098 that was degraded and needed to be replaced with Rad-Chain. 23) It was reported that there were a few signs around the outside of U-Farm (SCA, URMA) that were faded and needed to be replaced. 24) It was reported that there were a few signs (RMA, WRPS-RMA-098) on WRPS-RMA-098 that were faded and needed to be replaced.
5/16/2018	WRPS-PER-2018-1251	RMA--WRPS-RMA-055 sign is faded and cracked	While performing a "Walk Your Space Down" MOP, it was noticed at RMA--WRPS-RMA-055, the RMA "Radioactive Material Area sign is faded and cracked to the point you cannot barely read it. It was also notice at S-Complex area, the Horse trailer RMA--WRPS-RMA-052 had small amounts of trash inside the trailer flooring. And at Upper S-Farm within the change trailer (MO-296), it was noticed that the rad barrier floor taping and RMA floor sticker is fading and rad tape is peeling, coming off. There are also General Warning Operational signs fading and not legible.
5/16/2018	WRPS-PER-2018-1252	S Farms Tumbleweeds are a nuisance	While performing a "Walk Your Space Down" MOP at S-Complex, it was noticed that Tumbleweeds are becoming a nuisance to the point they are covering up warning and radiological signs. They are blocking walk way entrances and accumulating in large piles.

5/16/2018	WRPS-PER-2018-1228	non-M&TE instrument/ equipment Calibrations	Prior to using a calibrated instrument/equipment the qualified user is required to verify that the instrument/equipment is within its calibration due date. When non-M&TE instrument/equipment, which is calibrated through EAM, is approaching its calibration due date or is out of calibration there is no requirement to follow up or inform the instrument owner. The PM owner will have a late PM due, but it may not be the same person or group as the instrument user/owner. This provides a single point of failure and is an HPI issue.
5/16/2018	WRPS-PER-2018-1255	222-S Contamination and entering AOP-103 for WHL employee	At 222-S, a WHL employee received skin contamination. The WRPS FOM's at 222-S responded and entered AOP-103. The FOM read section 1.0 Affected Personnel, Facilities, or Equipment, states "This abnormal Operating Procedure (AOP) applies to WRPS and WHL personnel and subcontractors doing work at the 222-S Lab Complex." Occurrence Reporting staff instructed WRPS FOM's to have WHL make notification and send their version of a SOEN. This is confusing to the 222-S FOM's because the procedure directs the FOM to make notifications and send the SOEN.
5/16/2018	WRPS-PER-2018-1256	ETF MCS reliability/ operation	Monitoring and Control System (MCS) continues to exhibit less than adequate reliability / operation. This evening we did not receive an audible alarm on the Operating Control Stations (OCS) in the Control Room for Pump Station #1 Hi Level or Hi-Hi Level condition. Discovery of the condition was made when SOM was reviewing ALARM HISTORIAN due to situation at Thin Film Dryer system and noted the Hi-Hi alarm on the Historian. SOM confirmed alarm was not active on the OCS alarm scroll screen or on the Alarm Summary graphic. This is especially disturbing as PS #1 pumps were in Manual for work related retest needs. The pumps were allowed to be placed in the Manual condition as the Control Room Operator should receive an early alert to pump in manual with the activation of a Hi-Level alarm.

5/16/2018	WRPS-PER-2018-1257	60J-F-1 (Thin Film Dryer Vessel Off Gas Blower) blower veins will not circulate	60J-F-1 (Thin Film Dryer Vessel Off Gas Blower) blower veins will not circulate (seized) and in this condition, Software permissive conditions are not met and Operation of the Thin Film Dryer cannot be conducted. The PER is to illustrate the point that additional measure may need to be instituted to reduce the failure rate of 60J-F-1. A review of JCS / EAM work control system list (18) work packages on this component of the TFD system since 1996.
5/17/2018	WRPS-PER-2018-1260	Material Request MR-18-01926	Material Request MR-18-01926 requested that a quantity of 200 each be pulled for Catalog IDs 664429 QL3 and 664427 QL3. Only 181 of each were delivered. Upon review of the Asset Suite panel TIMI321 Purchases/Receipts usage Statistics it was determined that a quantity of 200 each were recorded as being received on 3/11/2013 against PO 50731. No other purchases, receipts or issuance took place until MR-18-01926 was submitted to pull the items for review and potential excess. Concerns identified are that due the items being QL 3 MSA and AVS should have counted the quantity received, inspected, accepted and invoiced. 2101-M personnel should have counted quantity delivered to 218-A in fulfillment of the material request.
5/17/2018	WRPS-PER-2018-1254	State Waste Discharge Permit ST0004502	Discussion: State Waste Discharge Permit ST0004502 (ST4502) governs discharges of effluents to the 200 Area Treated Effluent Disposal Facility (TEDF). Special Condition S9 describes the requirements for the Effluent Variability Study that must be performed for certain Waste Treatment Plant (WTP) effluent discharges. Concern: The wording within Condition S9 regarding what triggers the effluent variability study to begin could be interpreted differently by various parties. The wording states, "a variability study is required whenever there is a Significant New Source of discharge to the 200 Area TEDF. A significant New Source is a new discharge to 200 Area TEDF, which may not be fully characterized through sample analysis or process knowledge and may have a measureable impact on the 200 Area TEDF." There is a concern that this could be interpreted by some agencies to mean the first WTP discharge to TEDF under ST4502 would trigger the effluent variability study. In addition, as different WTP facilities are started and tested they will also send various effluent discharges to TEDF. These periodic construction and testing discharges could also be interpreted to trigger the effluent variability study. The WRPS Environmental Department's interpretation of the language within State Waste Discharge Permit ST0004502 (ST4502), Special Condition S9 is that the effluent variability study is not triggered until cold commissioning of the Low Activity Waste Vitrification Facility. The ETF/LERF/TEDF facility needs a statement, and basis, that provides interpretation and direction to assure compliance with the Effluent Variability Study clause of the Waste Discharge Permit.

5/17/2018	WRPS-PER-2018-1261	(MO-296 window seal is popping out	While performing a "Walk Your Space Down' MOP at S-Complex Farm. It was noticed on the change trailer (MO-296), the window seal on the west side of trailer is popping out. It appears the west side trailer had a lot of sun exposure, causing the window to lose its sealant and weather stripping. Picture of window attached.
5/17/2018	WRPS-PER-2018-1262	Concern is that 2101-M is not correctly identifying material that it pulls off the shelf.	MR-18-02515 was submitted to pulled a quantity of 2 for Catalog ID (CID) 666887 QL 3 for review and potential disposition as excess. MR-18-02515 created Asset Suite MR 10012809 which was electronically submitted to 2101-M to have the MSA storekeepers pull the material off the shelf. MSA pulled one pump for CID 666887 and one pump that was marked as CID 666889. WRPS Material Coordinators identified the issue and contacted 2101-M to pulled the correct pump. Concern is that 2101-M is not correctly identifying material that it pulls off the shelf.
5/17/2018	WRPS-PER-2018-1259	222-S Contamination on WHL employee	Identified reportable skin contamination (150,000 dpm/100cm2 beta-gamma / no alpha) on WHL employee (right face cheek).

5/17/2018	WRPS-PER-2018-1263	Nucon Particle Detector, Serial # 755-HD As Found Out of Cal	Nucon Particle Detector, Model # F-1000-HD, Serial # 755-HD-SAE200A (M&TE # 799-23-10-009) "As Found " reading during calibration was Out-Of-Tolerance. It was adjusted to manufacturer spec.
5/17/2018	WRPS-PER-2018-1264	Nucon Particle Detector, Serial# 755-HD-SAE-2000B as found out of cal	Nucon Particle Detector, Model #F-1000-HD, Serial# 755-HD-SAE-2000B (M&TE# 799-23-10-010) "As Found " reading during calibration was Out-Of-Tolerance. It was adjusted to manufacturer spec.
5/17/2018	WRPS-PER-2018-1265	FY2018-ENG-MD-0315 Observation 1	A management directed assessment on Cognizant System Engineer (CSE) Implementation in SST Retrievals was conducted from April 3 - 26, 2018 (Reference Assessment Report FY2018-ENG-MD-0315). The following observations were identified: Observation 1: An opportunity for improvement is to develop a CSE succession plan that identify the CSE staff for assignments to other CSE responsibilities within the company. In addition to many other benefits, a succession plan based on a staff rotation would provide the CSEs with a broader knowledge of the entire tank farm system. Observation 2: An opportunity for improvement is to develop guidance for assignment of a CSE. This guidance could be included in either TFC-ENG-STD-43, Rev. B-1, Engineering TOC Systems, Structures, and Components Boundaries; Selection Basis; Description; and Implementation clearly or TFC-ENG-FACSUP-P-01, Rev. F-2, TOC System Engineer Program. Observation 3: An opportunity for improvement is to reconcile the differences in AX systems Design Authority assignments between SPF and the Chief Engineer delegation. Observation 4: An opportunity for improvement is to consider adding CSE review and approval responsibility for the SRED to TFC-ENG-DESIGN-P-43, Rev. E4, Control Development Process for Safety-Significant Safety Instrumented Systems. Observation 5: An opportunity for improvement is for SST R&C Project Engineering to document in a plan CSE assignments and identification of systems to be transitioned at turnover. This plan should also identify applicable R2A2s. Observation 6: An opportunity for improvement is for the R2A2s for Cognizant System Engineer and Design Authority (R2A2-ENG-010, Rev. 0, April 2018, Roles Responsibilities, Accountabilities, and Authorities (R2A2s) Engineering – Cognizant Engineer; R2A2-ENG-028, Rev. 0, July 2016, Roles Responsibilities, Accountabilities, and Authorities (R2A2s) Engineering –Design Authority) be added to the respective qualification card. Observation 7: Project risk can be reduced by addressing nuclear safety actions earlier rather than later. An opportunity for improvement is for SST R&C Project Engineering to complete and document the control decision meetings for the Waste Transfer Associated Structure (WTAS) high temperature and WTAS low temperature SISs. The design changes made during construction should be evaluated for impacts to control selection to ensure any adjustments can be reasonably accommodated. Observation 8: An opportunity for improvement is to preplan the system health reporting for AX retrieval. This preplanning should include information needs, information sources, and identification of performance metrics and indicators. Additionally, improvements to the SEP are planned in accordance with the FY2018 Engineering Improvement Plan, RPP-PLAN-49038, Rev. 7 and these improvements should be incorporated into the AX Retrieval SEP plan recommended in Observation 5. Observation 9: An opportunity for improvement is to finish the process planning for AX-104. This will allow for completion of the system design and reduce the project risk of meeting the project goals for schedule and volume reduction. This process planning should fully address the decision on use of oxalic acid and include contingency planning for waste slumping. Observation 10: An opportunity for improvement is to resolve the equipment issues identified in the assessment report.

5/17/2018	WRPS-PER-2018-1266	Durometer, Serial# 19067 as found out of cal	Durometer, Model# 306L, Serial# 19067 (M&TE# 817-77-07-005) "As Found" reading during calibration was Out-Of- Tolerance. Was unable to Adjust. Item was "Rejected".
5/17/2018	WRPS-PER-2018-1267	Meriam Digital Manometer found OOT	Meriam Digital Manometer, Model# ZM202-A10038, Serial# 090500023 (M&TE # 817-28-09-026) "As Found" reading during calibration was Out-Of-Tolerance. It was adjusted to manufacturer spec.
5/17/2018	WRPS-PER-2018-1268	DOE OFI Waste Transfer Shutdowns During EC-08	Title: Investigated Waste Transfer Shutdowns During EC-08 Summary: I observed shutdowns during the EC-08 evaporator campaign and the restoration of transfer activities following each shutdown. There is one Finding associated with this report. ..... Issue Type: Finding (Level 3) Significance Level: 1 Statement: 36291-TF-F01 - Improper Documentation of Operational Issues. (Priority Level 3)(Ciola, May 2, 2018) Discussion: The practice of delaying the issuance of a Problem Evaluation Request (PER) and combining all issues encountered during a waste transfer into one PER at the conclusion of the activity has become commonplace. Delaying the PER issuance causes confusion as to what actions were assigned to correct the issue prior to resuming operations, and listing multiple issues on one PER obfuscates the assignment of trending codes and discovery dates. For example, on April 28, 2018, a waste transfer activity was in process when an alarming leak detector at AP-03A pit led to a shutdown. The transfer was reinitiated, but a PER was not written to document the shutdown and actions taken prior to resuming operations. WRPS-PER-2018-1100 was issued at the prompting of the DOE ORP Tank Operations Division Facility Representative later that day. A PER was also not written following the April 21 and 28 transfer shutdowns due to Material Balance Discrepancies that were out-of-specification, although the issues were resolved and the transfers reinitiated. The PER procedure, TFC-ESHQ-Q_C-C-01, Problem Evaluation Request, Rev M-8, requires that a PER is written in a timely manner, with the expectation being that it be within five days.

5/17/2018	WRPS-PER-2018-1269	DOE OFI Failure to Comply with Requirements of oral board	Title: Closure Review for Level 2 Finding S-16-AMTF-TANKFARM-020-F01 - Failure to Comply with Requirements for Conducting Oral Boards and the Implementation of the OE Qualification Program. ..... Issue Type: OFI (Opportunity for Improvement) Significance Level: 0 Statement: 36347-TF-O01. An Opportunity Exists to Improve the Methods to Ensure Procedural Compliance During Training Material Updates (Scrabeck) Discussion: WRPS-PER-2016-1634.2, Revise the Instructional Material Review Checklist to include verification of procedural compliance during the revision process, was written to address Apparent Cause (AC) 02. AC02 stated that "The procedures used for Oral Boards contained cumbersome elements and were not always unambiguous and therefore contributed to the problems observed. These are elements that should be routinely detected and corrected during periodic reviews. The failure to adequately maintain the procedure is determined to be a causal factor." When reviewing the revisions to the Instructional Material Review Checklist, which entailed the addition of an item to the checklist labeled "Procedure/Standards (developed/revised)," it was unclear to the assessors that the corrective action was sufficiently robust to correct the issue. Currently, staff that are involved in executing this checklist have an immediate awareness of what led to its inclusion, and are likely to take the appropriate actions. However this relies on expert and knowledge based action, and to a person without this firsthand knowledge, there is not sufficient specificity to give guidance to the intent. During discussions with WRPS staff, it was also unclear that if this corrective action had already been in place and in use by a person without the foreknowledge of the identified deficiency, that it would have prevented a similar deficiency. During discussions for this follow up, WRPS staff informed the assessors that the Instructional Material Review Checklist will be eliminated in the future, and that its functions will be performed as part of the electronic Training Implementation Process (TIP).
5/17/2018	WRPS-PER-2018-1270	DOE OFI Conduct of Oral Boards	Issue Type: OFI (Opportunity for Improvement) Significance Level: 0 Statement: 36347-TF-O02. TFC-BSM-TQ_IMP-C-07 Should Be Reviewed to Ensure Appropriate Use of Notes (Scrabeck) Discussion: WRPS-PER-2016-1634.2, Revise TFC-BSM-TQ_IMP-C-07, Conduct of Oral Boards, to Clarify the Intent of Oral Board Questioning Strategies and Include Language Clarifying Customization of Questions Based Upon Candidate Response, was written to address Apparent Cause (AC) 01. AC01 stated that "Clearly the procedure was not followed. This directly caused the conditions noted to exist. A deeper review in this area revealed further underlying elements that go beyond procedural compliance. The failure of the persons performing the boards to follow the procedure and recognize their sustained deviation from performance standards is addressed in this analysis." The assessors observed that many of the changes to TFC-BSM-TQ_IMP-C-07 are contained in notes. The assessors determined that an opportunity exists to improve the effectiveness of this corrective action and ensure its desired outcome by reviewing the changes against the criteria contained in DOE O 422.1 Admin Change 2, Attachment 2, Paragraph 2 p(3)i, which states, in part, "Procedure format standards: One action per step; Warnings, Notes, and Cautions are clear, do not contain actions, and precede the applicable step." REF: TOD Weekly 05-07-18; B Scrabeck; OFI; OA36347
5/17/2018	WRPS-PER-2018-1271	AW Farm low voltage found	On 5/17/2018 at 12:45 during electrical outage routine maintenance PM work evolutions in 241-AW Tank Farm, unexpected electrical energy of a maximum of 6 volts DC was discovered. Due to the fact that no more than 6 volts DC could be found anywhere inside of Enclosure 110, the AW ADM with concurrence of the maintenance manager determined this was not a LOTO violation. The unanticipated electrical power discovered appears to be feeding from the redundant 24 volt power supply of the running train for the primary exhauster system. As this is the very first time that this electrical enclosure has been serviced, this is a new and unanticipated condition.

5/17/2018	WRPS-PER-2018-1272	DOEOn-Call Facility Representative Log,	Title: On-Call Facility Representative Log, 05/07/18 to 05/14/18 Summary: Highlights from the week: • On 05/07/18, 222-S entered and exited AOP-115 for a polypropylene glycol leak from the air handling units. The glycol was cleaned up using absorbent mats. • On 05/08/18, Declared Group 6B(4) Informational (I) Occurrence Report for identification of legacy radioactive contamination greater than 10 times the total contamination values in 10 CFR 835 Appendix D. • On 05/08/18, tank farms entered TF-AOP-008, Response to High Winds and Dust Storms, when winds were greater than 25 mph, and exited the AOP after winds fell below 20 mph. • On 05/09/18, WRPS Declared Group 6B(4) Informational (I) Occurrence Report for identification of legacy radioactive contamination greater than 10 times the total contamination values in 10 CFR 835 Appendix D. • On 05/10/18, WRPS declared a Group 20(2) Low (L) Occurrence Report for failure to follow a prescribed hazardous energy control process that resulted in potential worker exposure to uncontrolled hazardous energy. • On 05/10/18, tank farms entered TF-AOP-014, Response to Lightning, for lightning within 10 miles of tank farms, and then exited the AOP when lightning was greater than 50 miles from tank farms. • On 05/10/18, tank farms entered TF-AOP-008, Response to High Winds and Dust Storms, for winds greater than 20 mph, and then exited the AOP the following morning when winds were less than 20 mph. • On 05/11/18, tank farms entered TF-AOP-014, Response to Lightning, when lightning was within 50 miles of tank farms, and exited the AOP the following morning when lightening was outside of 50 miles. • On 05/11/18, tank farms entered TF-AOP-012, Response to Unplanned Loss of Electrical Power, after a loss of electrical power to 2704HV, 2750E and 2752E, and exited the AOP the following morning after electrical power was restored. ---------- Issue Type: OFI (Opportunity for Improvement) Significance Level: 1
5/17/2018	WRPS-PER-2018-1253	SX FArm stadium lighting systempower	While performing start up of SX farm stadium lighting system, it was discovered that one light pole(Light Pole #6) did not have power supplied to disconnect. Power supply is via direct buried cable.
5/17/2018	WRPS-PER-2018-1273	Vehicle Accident	There was a vehicle accident in A-farm parking lot. Employee backing into a light pole that is place directly in the travel path of the parking lot. The placement of this pole and the lack of situational awareness contributed to the accident. The placement of this pole needs to be evaluated and if possible removed from the parking lot. The pole does not work and it increases the chances of a vehicle accidents in A-Farm parking lot.

5/18/2018	WRPS-PER-2018-1274	PMID	The preventative maintenance identification document (PMID) process has undergone several revisions over the past 12-24 months that have made some needed positive impacts. However, the changes have led to an unintended erosion of the process coherence. There is now a lack of natural flow and ease of task execution. Additionally, there are several steps that are either non-value added or repetitive. PMIDs are one of the methods Engineering uses to communicate TSR and ENV compliance requirements to Operations. The changes have complicated this communication tool to the point where clear requirement flow down is increasingly difficult. The Human Performance Survival Guide (WRPS-56532) warns of clumsy processes that could lead to increases in human error and missed requirements.
5/18/2018	WRPS-PER-2018-1275	FFARP Black Dust	Found Black dust in nasal cavity after doffing FFAPR from SY-Farm work.
5/21/2018	WRPS-PER-2018-1276	Fluke M&TE Found Out-of-Tolerance	Fluke 772 Process Clamp Meter, Model 772, Serial # 37840127WS (M&TE# 825-45-02-006) "As Found" reading during calibration was Out-Of-Tolerance. It was adjusted to manufacturer spec.

5/21/2018	WRPS-PER-2018-1277	Contaminated Bird Feces at ETF	During the performance of a Scheduled Radiation Survey Task Description (LE-D012) at ETF, contaminated bird feces was discovered. Total Contamination of; Surge Berm (Radiological Buffer Area): Location # 1: 4,500 dpm/100 cm2 Beta-Gamma and 7 dpm/100 cm2 Alpha, Verification Berm Area (Non-Rad Area): Location # 2: 9,000 dpm/100 cm2 Beta-Gamma and 7 dpm/100 cm2 Alpha No removable contamination was detected. The locations were deconned. Survey results are documented in Survey Simple on survey # LE-1800962
5/21/2018	WRPS-PER-2018-1279	Procedure TFC-ESHQ-RP-MON-C-12, Temporary Shielding	Procedure TFC-ESHQ-RP-MON-C-12, Temporary Shielding, requires in Section 4.6 that an annual survey and inspection be performed and documented in either an Interoffice Memorandum or by utilizing the Assessment Tracking System website. None of the facilities completed their annual assessment until after the initiation of internal assessment was announced. While no violation of the procedure occurred an opportunity for improvement may exist.
5/21/2018	WRPS-PER-2018-1278	Scheduled Radiation Survey Task Description (LE-A004) at ETF, contaminated tumbleweed fragments were discovered	During the performance of a Scheduled Radiation Survey Task Description (LE-A004) at ETF, contaminated tumbleweed fragments were discovered. Total Contamination of; Inside West LERF Perimeter Fence (Soil Contamination Area): Location # 1: 23,810 dpm/100 cm2 Beta-Gamma and <500 dpm/100 cm2 Alpha, Inside North LERF Perimeter Fence (Soil Contamination Area): Location # 2: 13,580 dpm/100 cm2 Beta-Gamma and <500 dpm/100 cm2 Alpha No removable contamination was detected. The locations were deconned. Survey results are documented in Survey Simple on survey # LE-1800978.

5/21/2018	WRPS-PER-2018-1280	222-S EF-4 requiring maintenance due to oil and grease leaks	SOE noted the smell of oil near diesel operated exhaust fan EF-4, with a small amount of oil (estimated at a couple of ounces) under the diesel engine and a visual observation of large amount of grease under the coupler for EF-4. The EF-4 Exhaust Fan was in operation at the time with EF-2 Electric fan. The two other Electric exhaust fans were not running.
5/21/2018	WRPS-PER-2018-1281	Scheduled Radiation Survey Task Description (LE-D012) at ETF, contaminated bird feces was discovered.	During the performance of a Scheduled Radiation Survey Task Description (LE-D012) at ETF, contaminated bird feces was discovered. Total Contamination of; SW Corner of 202SED (Non-Rad Area): Location # 1: 20,000 dpm/100 cm2 Beta-Gamma and 56 dpm/100 cm2 Alpha No removable contamination was detected. The locations were deconned. Survey results are documented in Survey Simple on survey # LE-1800986.
5/21/2018	WRPS-PER-2018-1282	WO-377415 in process review not performed.	C-105 sample sleeve removal WO-377415, step 5.6 directed contact to be made to initiate an in-process review. This was not performed. This was noted during work order review.

5/21/2018	WRPS-PER-2018-1283	PB2 pump speed parameter "11.05 EXT REF 1 MAXIMUM" was found in a discrepant condition	The 242-A Evaporator facility PB2 Slurry Out Pump is operated with an ABB VFD. During the EC08 campaign there were fault messages that came in on the VFD display related to "DC Under Voltage" and "Over Current" while Staff attempted to start the pump. As a troubleshooting activity, Engineering wanted to understand if any of the VFD operating parameters had inadvertently been changed. Work Order # 397224, 242-A Confirm VFD Parameters, Meggering and Replace Relay was performed on 5/17/2018 to confirm that VFD parameters are in accordance with RPP-RPT-58868, 242-A EVAPORATOR ABB VFD SC-PB2-1 CONFIGURATION PARAMETERS. A check was performed by WRPS Quality Engineering of all as-found parameter and compared against RPP-RPT-58868. As a result of the system check, parameter "11.05 EXT REF 1 MAXIMUM" was found in a discrepant condition. The parameter is related to pump speed and is supposed to be set to 1538 rpm and was found to be set at 1500 rpm.
5/21/2018	WRPS-PER-2018-1284	AN105 failed to obtain daily reading (5/15/18) per OSD-T-151-00031 and was taken out of service.	AN105 failed to obtain daily reading (5/15/18) per OSD-T-151-00031 and was taken out of service. An error occurred when the AN-105 tank Enraf, AN105-WST-LIT-104, froze during the daily automatic Lift and Weigh, preventing readings from being obtained.
5/21/2018	WRPS-PER-2018-1285	AW Farm unplanned exh shutdown	AW Farm B-Train Primary Exhauster (296-A-47) experienced an unplanned shutdown during the shedding of electrical loads for the pending AW Farm electrical outage.

5/21/2018	WRPS-PER-2018-1286	MOP/WSV US Customary Units	Staff trying to implement the Engineering Calculation procedure found it difficult to implement the requirement to use only "English Customary Units". It turns out that there is no such thing as "English Customary Units". There is "English Standard Units" and "U.S. Customary Units" but no "English Customary Units". Given that there is no such type of unit, it is not possible to follow the procedural requirement. Talking to Mission Integration staff at a staff meeting indicated that most took this to indicate U.S. Customary Units, but the procedure should be updated so the user requires no interpretation. Mission Integration Staff found it cumbersome to always use one system of units when many of the inputs came in different types of units. Chemical units for instance, do not conform well to anyone's "standard units" because most chemical units were developed after English Standard Units or U.S. Customary Units were defined. We understand the desire to use a standard set of units for design, but for non design uses, it does not make sense to be so prescriptive.
5/21/2018	WRPS-PER-2018-1288	Training Reports access	The reports generated to provide manager's (and others) with various training reports (enrollment, scheduled training, etc.) did not function as designed. These website reports are advertised as the new and improved methodology for determining essential employee training functions, class schedules, and qualification. Managers are tasked with ensuring employees are qualified, attend training as scheduled, attend scheduled medical evaluation appointments, and others. This cannot be performed if the information is inaccessible.
5/21/2018	WRPS-PER-2018-1291	An opportunity for improvement is to develop a CSE succession plan	A management directed assessment on Cognizant System Engineer (CSE) Implementation in SST Retrievals was conducted from April 3 - 26, 2018. Ten observations were identified (reference Assessment Report FY2018-ENG-MD-0315). Per TFC-ESHQ-AP-C-01, Section 4.6, each observation will be documented in its own PER. Observation 1: An opportunity for improvement is to develop a CSE succession plan that would groom the CSE staff for assignments to other CSE responsibilities within the company. In addition to many other benefits, a succession plan based on a staff rotation would provide the CSEs with a broader knowledge of the entire tank farm system.

5/21/2018	WRPS-PER-2018-1292	An opportunity for improvement is to develop guidance for assignment of a CSE	A management directed assessment on Cognizant System Engineer (CSE) Implementation in SST Retrievals was conducted from April 3 - 26, 2018. Ten observations were identified (reference Assessment Report FY2018-ENG-MD-0315). Per TFC-ESHQ-AP-C-01, Section 4.6, each observation will be documented in its own PER. Observation 2: An opportunity for improvement is to develop guidance for assignment of a CSE. This guidance could be included in either TFC-ENG-STD-43, Rev. B-1, Engineering TOC Systems, Structures, and Components Boundaries; Selection Basis; Description; and Implementation clearly or TFC-ENG-FACSUP-P-01, Rev. F-2, TOC System Engineer Program.
5/21/2018	WRPS-PER-2018-1293	An opportunity for improvement is to reconcile the differences in AX systems Design Authority assignments	A management directed assessment on Cognizant System Engineer (CSE) Implementation in SST Retrievals was conducted from April 3 - 26, 2018. Ten observations were identified (reference Assessment Report FY2018-ENG-MD-0315). Per TFC-ESHQ-AP-C-01, Section 4.6, each observation will be documented in its own PER. Observation 3: An opportunity for improvement is to reconcile the differences in AX systems Design Authority assignments between SPF and the Chief Engineer delegation.
5/21/2018	WRPS-PER-2018-1294	An opportunity for improvement is to consider adding CSE review and approval responsibility	A management directed assessment on Cognizant System Engineer (CSE) Implementation in SST Retrievals was conducted from April 3 - 26, 2018. Ten observations were identified (reference Assessment Report FY2018-ENG-MD-0315). Per TFC-ESHQ-AP-C-01, Section 4.6, each observation will be documented in its own PER. Observation 4: An opportunity for improvement is to consider adding CSE review and approval responsibility for the SRED to TFC-ENG-DESIGN-P-43, Rev. E4, Control Development Process for Safety-Significant Safety Instrumented Systems.

5/21/2018	WRPS-PER-2018-1295	Contamination found at 244AR	Contaminated mouse nest and droppings were discovered after Transformer C6252P was removed on the west side of 244AR building/200E. The mouse nest and droppings were found to have 375,000 dpm/100cm2 Beta/Gamma and No Alpha. For additional information see survey BOAZ-1800170.
5/21/2018	WRPS-PER-2018-1296	An opportunity for improvement is for SST R&C Project Engineering to document in a plan CSE assignments	A management directed assessment on Cognizant System Engineer (CSE) Implementation in SST Retrievals was conducted from April 3 - 26, 2018. Ten observations were identified (reference Assessment Report FY2018-ENG-MD-0315). Per TFC-ESHQ-AP-C-01, Section 4.6, each observation will be documented in its own PER. Observation 5: An opportunity for improvement is for SST R&C Project Engineering to document in a plan CSE assignments and identification of systems to be transitioned at turnover. This plan should also identify applicable R2A2s.
5/21/2018	WRPS-PER-2018-1297	An opportunity for improvement is for the R2A2s for Cognizant System Engineer and Design Authority	A management directed assessment on Cognizant System Engineer (CSE) Implementation in SST Retrievals was conducted from April 3 - 26, 2018. Ten observations were identified (reference Assessment Report FY2018-ENG-MD-0315). Per TFC-ESHQ-AP-C-01, Section 4.6, each observation will be documented in its own PER. Observation 6: An opportunity for improvement is for the R2A2s for Cognizant System Engineer and Design Authority (R2A2-ENG-010, Rev. 0, April 2018, Roles Responsibilities, Accountabilities, and Authorities (R2A2s) Engineering – Cognizant Engineer; R2A2-ENG-028, Rev. 0, July 2016, Roles Responsibilities, Accountabilities, and Authorities (R2A2s) Engineering –Design Authority) be added to the respective qualification card.

5/21/2018	WRPS-PER-2018-1298	Assessment for CSE risk reduction	A management directed assessment on Cognizant System Engineer (CSE) Implementation in SST Retrievals was conducted from April 3 - 26, 2018. Ten observations were identified (reference Assessment Report FY2018-ENG-MD-0315). Per TFC-ESHQ-AP-C-01, Section 4.6, each observation will be documented in its own PER. Observation 7: Project risk can be reduced by addressing nuclear safety actions earlier rather than later. An opportunity for improvement is for SST R&C Project Engineering to complete and document the control decision meetings for the Waste Transfer Associated Structure (WTAS) high temperature and WTAS low temperature SISs. The design changes made during construction should be evaluated for impacts to control selection to ensure any adjustments can be reasonably accommodated.
5/21/2018	WRPS-PER-2018-1299	Assessment CSE preplan system help	A management directed assessment on Cognizant System Engineer (CSE) Implementation in SST Retrievals was conducted from April 3 - 26, 2018. Ten observations were identified (reference Assessment Report FY2018-ENG-MD-0315). Per TFC-ESHQ-AP-C-01, Section 4.6, each observation will be documented in its own PER. Observation 8: An opportunity for improvement is to preplan the system health reporting for AX retrieval. This preplanning should include information needs, information sources, and identification of performance metrics and indicators. Additionally, improvements to the SEP are planned in accordance with the FY2018 Engineering Improvement Plan, RPP-PLAN-49038, Rev. 7 and these improvements should be incorporated into the AX Retrieval SEP plan recommended in Observation 5.
5/21/2018	WRPS-PER-2018-1300	An opportunity for improvement is to finish the process planning for AX-104.	A management directed assessment on Cognizant System Engineer (CSE) Implementation in SST Retrievals was conducted from April 3 - 26, 2018. Ten observations were identified (reference Assessment Report FY2018-ENG-MD-0315). Per TFC-ESHQ-AP-C-01, Section 4.6, each observation will be documented in its own PER. Observation 9: An opportunity for improvement is to finish the process planning for AX-104. This will allow for completion of the system design and reduce the project risk of meeting the project goals for schedule and volume reduction. This process planning should fully address the decision on use of oxalic acid and include contingency planning for waste slumping.

5/21/2018	WRPS-PER-2018-1301	An opportunity for improvement is to resolve the identified equipment issues in the referenced assessment report.	A management directed assessment on Cognizant System Engineer (CSE) Implementation in SST Retrievals was conducted from April 3 - 26, 2018. Ten observations were identified (reference Assessment Report FY2018-ENG-MD-0315). Per TFC-ESHQ-AP-C-01, Section 4.6, each observation will be documented in its own PER. Observation 10: An opportunity for improvement is to resolve the identified equipment issues in the referenced assessment report.
5/21/2018	WRPS-PER-2018-1302	ETF Quarterly tickler not being performed	A Calibration PM was being performed on TS-95C-104. The Control room operator thought that the level switch was being calibrated so took the initiative to see what the impact on the plant was as she believed that the calibration would take the plant down. When she looked up the ETF-ARP-95C-001 she found that the hard copy of that procedure was not in the hard copy binder but instead the regular operating procedure ETF-95C-001 A-2 was in its place. When she went to the regular Operating procedure book, Rev. A-1 was still in that book. The old revision of ETF-95C-001 was in the book but it was not used. The intention was to use the ARP which was not found so the computer would have to be used to get the latest rev. It is obvious that when ETF-95C-001 A-2 was issued, it was mistakenly put in the ARP book instead of the regular book. We maintain a set of hard copies of selected procedures in the control room and have a very good track record of keeping them up to date. We have a quarterly tickler to review them against the computer and that tickler has not been performed since the new revision of ETF-95C-001 came out.
5/21/2018	WRPS-PER-2018-1303	ETF Process Floor CA's not being down posted	This PER should be for trending purposes. Frequently, ETF shift personnel have encountered maintenance CA's on the ETF process floor where work was completed for the day or the week but the associated CA for the job was not downposted, reduced, or removed. Today where scaffolding was removed in the Surge pump area a CA was left and not removed, or reduced to a point where access for shiftly readings and routine surveillances is restricted. The CA was left such that the access to the upper portions of the evaporator is restricted as well as access to the entire seal water room. Additionally, an area around the PDM filters is still posted as a CA and a full week has gone by since filters were replaced.

5/22/2018	WRPS-PER-2018-1236	MOP/WSV ETF Requirements of Radiological book	Reference WRPS-MOP-2018-1403 ESHQ-RP_ADM-C-28, REV A requirements not being documented in the Radiological log book. * Emergency response actions taken; (Some documentation is being done.) * Safety or compliance issues; (Some documentation is being done.) * Radiological posting changes; (Some documentation is being done.) * Status of jobs that may impact on-coming shifts; (Some documentation is being done.) * Delinquent radiological routine surveillances; (No documentation) * Routine surveillance Action Levels exceeded; (11 of 12 known instances were not documented) However these are being documented in the ETF shift operations logbook for shift office notification. * Survey reports unable to be completed by end of shift.; (None have been documented.) This requirement in ESHQ-RP_ADM-C-28, REV A-1 should be evaluated for removal. No drivers could be found for this requirement. also having around the clock shift work and the ETF RadCon not having access to another logbook. * Place a red arrow in the left-hand margin beside entries that require follow-up actions or other important information regarding radiological conditions (e.g., PERs, missed routines, emergency response, or other important information). (A few red arrows were used but many entries with spills and contamination found outside of boundaries were not red arrowed.) 2. The current logbook does not meet the minimum requirements for TFC-ESHQ-RP_ADM-C-28, REV A-1 based on the entries reviewed. 3. HPTs should be briefed on the requirements of TFC-ESHQ-RP_ADM-C-28, REV A-1 and given expectations for the logbook from the RCFLM Logbook dates reviewed were from 01/01/18 to present. Evaluate logbook requirements for; 1. if a radiological Control logbook is needed; (Yes) 2. if the current practices meet expectations/requirements for logbooks; (no) 3. (if the logbook is needed) what actions are necessary to establish a logbook the meets expectation/requirements; (HPTs should be briefed on the requirements of TFC-ESHQ-RP_ADM-C-28, REV A-1 and given expectations for the logbook from the RCFLM.)
5/22/2018	WRPS-PER-2018-1247	Survey and PPE doffing requirements	Personnel performing work in a contamination area and exiting through a personal survey device with the hard hat, ball cap or winter stocking cap that was worn in the contamination area.
5/22/2018	WRPS-PER-2018-1304	LOTO installation at 2750E	On 5/21/18, Stationary Operating Engineers were assigned to Facilities for LOTO installation at 2750E. One of the SOEs assigned was not a designated Controlling Organization member authorized to perform LOTO activities as required by DOE-0336. The individual is current in the COQW training course and is also a certified SOE.

5/22/2018	WRPS-PER-2018-1166	222-S Operations Maintenance Issue Tracking Process communication between WRPS and WHL	There are three lights that provide adequate light for the work activities in Room B1-E in 222-S Laboratories as this is the room where the radiochemistry group stores radiological sources, calibrated standards, sample mounts, and scintillation glass vials, required to be used on analytical instruments prior to running samples. One of the three lights failed on 4/3/18. A WHL employee called the Lab Leader's Office (3B) and spoke to the Lab Leader and asked how the issue should be reported to Operations. The Lab Leader said he would take care of it. The Lab Leader stated he did not log it in the book but sent an email to the Electrical FWS. The Electrical FWS stated that on 4/13/18 electricians were sent to re-lamp the B1-E light but found they could not as it would require scaffolding. There were no other lights out at that time. Sometime after work was completed on Thursday evening, April 19, 2018, and Monday, April 23, 2018 the second light had failed leaving Room B1-E completely dark. It is unclear when the third light failed. On Monday, April 23, 2018, the Radiochemistry Chemist discovered that Room B1-E was without lights. At 1227 hours, the WHL Laboratory Manager was notified that the WHL Radiochemistry Chemist called a Stop Work for Room B1-E until the lights could be properly restored. WRPS FOM advised that the Electrical FWS would be holding a pre-job at 1300 hours to restore the lights in Room B1-E. At 1404 hours, the lighting had been restored in Room B1-E and the Stop Work was lifted by the WHL employee. A discussion was initiated with (b)(6) about the need for a process that WHL can follow when they have identified 222-S facility maintenance issues that require attention. The discussion ended with (b)(6) saying that the FOMs be notified for any issue requiring maintenance attention as they are the ones to determine priority. However, in the discussion, which involved the FOMs, it became clear that there is no tracking system for WHL to use to ensure all items are appropriately addressed. WRPS employees use EAM to track issues like this. Further. WHL says its possible that one FOM may not be aware of an issue that was raised to another FOM. The central place to go to find out if an issue had been raised would be the logbook. All maintenance requests get logged in for follow up. When this discussion was shared with WHL (b)(6) WHL (b)(6) was not in favor of that decision made by (b)(6) and said they would discuss it further with WRPS Senior Management Team.
5/22/2018	WRPS-PER-2018-1289	222-S PPE purchasing issue	On 5/3/18 the Chemical Hygiene Officer (CHO) discovered a lab coat in use by personnel working in 2225 Room #5AB. This lab coat was of a lightweight material and a design unfamiliar to the CHO. Physical inspection of the lab coat found seam gaps along the arms and shoulders and the lab coat was easy to tear. Numerous lab coats of this type were found in rooms 5AB and 4P (most of them still packaged); they were all removed from service and all but 3 were discarded. One of the three lab coats was shown to WRPS and WHL Industrial Health and Safety - those individuals had no knowledge of the existence of the lab coats and agreed that they were of inferior quality for lab work. The CHO had a discussion with the WRPS Operations' Chem tech involved in the procurement of these lab coats which revealed the intent had been that the CHO and Industrial Hygiene officer would evaluate these lab coats before being placed into service. However, they were found to be in service before that evaluation could take place.
5/22/2018	WRPS-PER-2018-1305	Reusable Contaminated Equipment (RCE) was documented with the incorrect RSR number on the blue card	On 5/22/18, a shipment of Reusable Contaminated Equipment (RCE) was documented with the incorrect RSR number referenced on the ORRSR (blue-card). The ORRSR used was #: WRPS-RAD-SCO-I/-II 2018. The RCE was surveyed properly for shipment, however, the surveys performed previously during work progress were referenced on the ORRSR. The shipping survey performed on 5-21-18, (see RSR WTP-1800740), should have been referenced instead.

5/22/2018	WRPS-PER-2018-1258	222-S Perform an annual evaluation of temporary shielding applications	The documentation of the annual Temporary Shielding assessment performed by 222-S Laboratory personnel at the beginning of the assessment did not contain all of the information required by the Temporary Shielding procedure (TFC-ESHQ-RP_MON-C-12) section 4.6. This section specifically requires: Perform an annual evaluation of temporary shielding applications, including: •Continued need for temporary shielding •Upgrading of temporary shielding to permanent status •Consideration of source removal/reduction •Locations where the inventory by exception process was utilized to account for the temporary shielding and the reasoning the inventory by exception process was used. •Document the results of the evaluation as a Management Assessment utilizing the Assessment Tracking System Website, or issue an Interoffice Memorandum.
5/22/2018	WRPS-PER-2018-1306	SCBA Mask eye protection from sun	Mask users are using unapproved methods (i.e. duct tape, masking tape, MSA or 3M cover lens) to block the sun from their eyes. Mask users need eye protection from the harmful rays of the sun (especially our crane operators). As it stands right now we do not have any tinted cover lens that will work on a SCOTT Health & Safety mask.
5/22/2018	WRPS-PER-2018-1307	MOP/WSV System Engineering programs for systemsnot required	It was never the intention to implement the System's Engineering program for systems not required by the DOE guidance unless specifically determined by WRPS management that we would do so. As a best management practice some of the elements such as System Health Presentations are being done to facilitate communications with senior management and the customer. Desk guide does not make the distinction clearly between the two and could be construed as requiring the full program simply because the health of the system is being monitored and presented.As an improvement the guide should be revised to clarify the intent for SEP 3 and 4 systems.

5/22/2018	WRPS-PER-2018-1308	242-A Logbook completeness not met	The requirement in TFC-OPS-OPER-C-17 as shown below does not appear to be completed each shift as required by the 242-A SM. Review the following logbooks each shift, ensuring their adequacy, accuracy, completeness, timeliness, and conformance with management direction. (7.1.6) a. Identify and respond to trends. b. Initial or sign in the logbook.
5/22/2018	WRPS-PER-2018-1315	242-A Evap plywood cvrs deterioratin g	The spare condenser for the 242-A Evaporator in the 2101M laydown yard has plywood covers over all openings. The covers are deteriorating to the point that one is no longer sealing the condenser. See attached photo.
5/23/2018	WRPS-PER-2018-1250	AX Exhauster Shutdown	During our pump pull this Friday we experienced an exhauster failure at 10:21 but were not notified by operators until 10:56. During this time we completed the horse tail cut and separate portion of the Pump removal without any contamination detected on the sleeving or in the work platform area. There was no loss of containment or open pathway to the pit or tank during the time we did not know the exhausters went down. Work package 260741 section 5.9.1.1.1 states;IF exhauster shuts down during pump removal CONTACT Rad Con Management and Operations Management for concurrence to continue.5.91.1.1.2POST the work area ARA if proceeding without exhauster operating. As a result we did not post the area ARA because we were not aware of that condition. When notified of the exhausters being shut down we paused the work ,made notifications to shift office of less than timely notification issue. Work was being placed into safe configuration and workers were told to leave the deck. The Field Work Supervisor received a second call from operators letting us know they had successfully restarted the exhausters remotely at approximately 1106. The work continued to lay down the pump on its cribbing which the work package allowed with an operating exhauster. The crew then exited for lunch . After discussion with Shift Office it was determined that we would re-enter the farm post an ARA to complete our work and perform a down post air sample. In addition the engineering sample was taken to the count room to verify negative air during the time between our being notified and the actual restart of the exhausters when we were still performing work..

5/23/2018	WRPS-PER-2018-1290	RPP-CALC-24466 AZ Tank Farm Arc Flash Discrepancy	Electrical Power Distribution Study RPP-CALC-24466 for AZ Tank Farm contains a study for an Arc Flash Analysis. Within the Arc Flash Analysis, the utility fuse (C8X571) is identified as a 353C10 25A fuse. However, field identification determines that that fuse is a 358C10 25A fuse. Longer trip time of the fuse difference, an arc flash for electrical equipment in-between the utility fuse and up to the next overcurrent protection device is higher then what is identified within the calculation.
5/23/2018	WRPS-PER-2018-1287	RPP-CALC-60631 A/AX Area Parking Arc Flash Discrepancy	Electrical Power Distribution Study RPP-CALC-60631 for A/AX Area parking lighting calculation contains a study for an Arc Flash Analysis. Within the Arc Flash Analysis, the utility fuse (C8X133) is identified as a T-Link 6A fuse. However, field identification determines that that fuse is a T-Link 12A fuse. Due to the increase in allowable current the arc flash for electrical equipment in-between the utility fuse and up to the next overcurrent protection device is higher then what is identified within the calculation.
5/23/2018	WRPS-PER-2018-1316	ETF contaminated tumbleweed	During the performance of a Scheduled Radiation Survey Task Description (LE-D012) at ETF, a contaminated tumbleweed was discovered. Total Contamination of; West of 2025EA: (Non-Rad Area): Location # 1: 13,870 dpm/100 cm2 Beta-Gamma and <500 dpm/100 cm2 Alpha No removable contamination was detected. The tumbleweed was properly disposed of. Survey results are documented in Survey Simple on survey # LE-1801011.

5/23/2018	WRPS-PER-2018-1317	90 day Safety Logbook Issues	ETF-18-05 1/3/2018 3/5/2018 Downspout on south side of 2025E leaves a big water puddle that freezes. HPT's have to perform surveys in these areas and could accidently walk on ice and fall. Maybe they could add more gravel? 3110-2018-005 1/3/2018 1/15/2018 Excessive leaves were observed on the path near building 3110's parking lot which could contribute to a slip or fall. ETF-18-04 1/3/2018 2/28/2018 Pump station #1 has a leak on a union in front of the pump riser. Heater is broke so water is freezing. ETF-18-03 1/3/2018 3/16/2018 Install a catch tray under boiler for safety for workers underneath in case of leaks of 200 degree Fahrenheit water ETF-18-02 1/3/2018 3/22/2018 Place stations along side of rubber matting in surge and verification berms to identify where the walkway is in inclement weather. Concrete is very slippery when covered in snow. ETF-18-07 1/8/2018 2/14/2018 Pump pulled from TEDF line sitting in middle of walkway. Major safety hazard. If fire by electrical panel, access to exit pump station is cut off without climbing over pump. ETF-18-06 1/8/2018 3/22/2018 On 01/02/18, I responded to a leak UX/OX from a ground fault. There was an odor present in the leak. I would like to have IH available next time we start up to sniff the area if another leak occurs due to known mercury levels inside system. RET PRO 1/11/2018 1/16/2018 Rubber yellow booties for in farm work are slippery on ice and snow. Black traction boots have been stocked in years past. Can these be stocked again during the winter months.
5/23/2018	WRPS-PER-2018-1319	Blood contaminated respiratory equipment	A worker had a bloody nose that contaminated a mask and regulator on the previous Thursday. The contractor for their issuing station contacted us about this and was told to dispose of the blood contaminants and return the remaining parts of the rack to our issuing station. They also contacted the RPPA and were told the same thing. We believed this issue was finished until Monday morning when we found a bag with blood borne contaminants in it in the 278 Aw issuing station. Upon discovery we took actions to assure that contaminants were disposed of. The issue is that instead of following the instructions or following the procedure, which clearly gives instructions on how to handle this situation, they exposed many more people than necessary to blood borne pathogens. The respirator issuance procedure clearly reads that contaminated face pieces are not returned to the issue station and they are packaged in the field in bio-hazard bags and disposed of in approved containers. This is a clear violation of plant forces procedures and unnecessarily exposed many people to danger.
5/23/2018	WRPS-PER-2018-1320	222-S Work Package proper process issue	Working annual HEPA test package starting 05/07/18 a portion of the work package was started/completed, notified the FWS that work order #301243 and 301271 still needed to be completed. They were set aside and marked "not competed". Upon returning on 05/23/18 to complete the work, Vent and Balance leads were notified that work orders 301243 and 301271 were completed. Vent and balances leads reminded FWS again that they were in fact not completed. What was discovered upon investigating is that the work orders were ops accepted on 05/11/18 without the work being finished, and with blank data sheets. Vent and Balance Leads were then given work orders 301243 and 301271, removed from the package and told to perform field duties. This was done without Backing the package out of EAM and placed in working status, but left in OPS acceptance. The fact that this was noticed by Vent and Balance Techs and not noticed by work control, FWS, and Shift manager, shows that there is truly an issue with the processes of preparation, and the closing out of work packages that needs to be addressed. The Work package process was done without adhering to Procedure TFC-OPS-MAINT-C-01.

5/23/2018	WRPS-PER-2018-1318	NUCON Vapor project vapor tube issue	Samples were collected on incorrect media and could not be analyzed for ammonia. 2225 Laboratory has been working with Pacific Northwest National Laboratory (PNNL) on the NUCON Vapor research project. On May 16th, the 222-S teamster was scheduled to pickup vapor tubes, which had been used to collect ammonia. When the tubes were received, it was noticed that they were slightly shorter than the usual tubes for ammonia analysis. The beads inside looked similar but the length was different. Upon further investigation, it was discovered that these tubes were a different catalog number. The standard ammonia tubes are Anasorb 747, catalog number SKC-226-29. The ones that were received were Anasorb 747, SKC-226-81A. The beads in both tubes are similar but the SKC-226-29 beads are coated with sulfuric acid, which acts as a capture assist agent. The SKC-226-81A beads are not coated and it is believed that this tube won't capture ammonia well, if at all. The test plan written by PNNL indicates the SKC-226-29 tubes should have been used. When the IH supervisor was contacted to see why these tubes were issued by the IH media custodian, the supervisor said they were given direction by PNNL to procure that type of tube specifically for this project. It's not a tube the media custodian normally stocks. The tubes are still at 222-S but there isn't a lab, on-site or off-site, that will use this type of tube for ammonia analysis.
5/23/2018	WRPS-PER-2018-1321	Electrical Tape being used as temporary shielding for wires	During clean and inspects in various farms it was noted that there are a lot of wires with electrical tape on the ends. mainly on equipment that has been removed or modified. Electrical tape is ok for temporary shielding, but not for permanent shielding(safe off) wires. Electrical tape tends to fall off after time or come off with little pressure.
5/23/2018	WRPS-PER-2018-1322	Drum lid of 85 gal drum blew off due to pressurizatio n	While preparing an 85 gallon drum for hose and hose waste inside of C-Farm (b)(6) was loosening the drum ring and removing the bolt the drum was apparently pressurized due to the heat. The drum lid flew off the drum and over the head of (b)(6) nearly hitting them in the head.

5/24/2018	WRPS-PER-2018-1323	ETF contamination tumbleweed	During the performance of a Scheduled Radiation Survey Task Description (LE-D012) at ETF, contaminated tumbleweed fragments were discovered. Total Contamination of; Surge Berm (Radiological Buffer Area): Location # 1: 2,930 dpm/100 cm2 Beta-Gamma and 35 dpm/100 cm2 Alpha, No removable contamination was detected. The locations were deconned. Survey results are documented in Survey Simple on survey # LE-1801022.
5/24/2018	WRPS-PER-2018-0657	222-S 207-SL RPP-PLAN-54895 issue	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 RPP-PLAN-54895, "Quality Assurance Project Plan for the Multi-Media Sampling Program" Rev. 2 does not discuss the availability of critical spare parts. (HASQARD, Volume 1, Rev. 3, Section 9.1) Although probably not a concern for sampling the 207-SL retention basin, it might become a concern for more complicated sampling projects.
5/24/2018	WRPS-PER-2018-1324	Improvements to Ignition Source Control Screening form	During completion of an effectiveness review for WRPS-PER-2017-0645, a few administrative errors were identified in Ignition Control Screening forms associated with 4 work orders including check boxes not being completed or incorrect box checked, an incorrect PMID reference in the title, and in one case missing signatures for the Originator/Engineer. While these errors had no impact on the identified controls, they should have been caught by the checkers/reviewers of both the forms. All were associated with PMIDs, which do not receive the additional checks in WORA. Consideration should be given as to whether some questions are necessary on the forms and whether the two separate forms can be combined into a single form to simplify completion of the forms.

5/24/2018	WRPS-PER-2018-1325	Duplicate	A MOP was performed on the ETF Control Room Operator logbook. There was good overall log keeping compliance to the requirements of TFC-OPS-OPER-C-17. Some minor issues were found and passed on to the Facility Operations Manager as shown below. The following could use some improvement but were not found to be deficient. Taking the suggested action would enhance the perception of Conduct Of Operations at ETF. We should ensure pertinent information is being recorded in the log book. Last month you may recall there was a particular day that significant maintenance activities were ongoing (UV/OX). On that particular day it was the one thing that was keeping the plant from operating. On that same day there was no log entry of the maintenance performed that allowed Operations to retest that system later that day and into the next. This information should have been recorded in the log. This month as I reviewed the log there was ongoing maintenance on another system that was critical to Operation of the Evaporator system. I did not witness the final outcome of the maintenance effort, but I noted that there was no log entry regarding those ongoing efforts prior to me leaving. Given time I should have followed up to ensure that when all work efforts were complete, a log entry was made, but I ran out of time. Regardless, more detailed log keeping of the efforts (versus none) as they progressed would produce that golden star in my mind. Again, I see this as an improvement and not a deficiency during this month's review. The NCO's and SOM's need to understand that the information in the log helps others understand what occurred. If it is not written down, it did not happen in the readers view. I have cut and pasted the things that should be logged from OPER-C-17 below if anyone is interested. Note that I removed several items that do not apply at ETF. The following did not meet the requirements of the OPER-C-17 procedure. I have cut and pasted the exact requirement so the crews can see and discuss. Please ensure you take action on these items and feel free to use this email as the initiator. Requirement: Use logbook pages consecutively. "If for any reason a page is skipped or only partially completed, draw a diagonal line through the unused section, sign or initial, and date the line drawn. Issue: Several pages in the new green logbook did not utilize the back of the page (left side). When they were not used they did have a single diagonal line drawn through them, however they were not initialed/signed or dated. Action: Ensure the lines mentioned above are initialed/signed and dated. Recommendation: Suggest we set the expectation that the back of the pages be used. This would be consistent with other locations using the same type of logs. Requirement: For continuous logbooks, begin each new page with a header, and each new day with a line, containing the date, shift, and name of the responsible log keeper. Issue: At least one page in the new green logbook did not begin the page with a header containing the shift and name of log keeper.
5/24/2018	WRPS-PER-2018-1326	The two yellow buckets (See Photo 11 in Attachment 1) near the south side of the evaporator are used to catch compressor oil.	Ecology Dangerous Waste Inspection Letter 18-NWP-082: LERF & ETF Concern 1: The Chapter 173-303-515(6) WAC states the following: . Standards for used oil generators. This subsection applies to all used oil generators and persons managing materials under this section. The standards for used oil generators of 40 C.F.R. Parts 279.20 through 279.24 are incorporated by reference except 40 C.F.R. Part 279.21. Used oil generators and persons managing materials under this subsection are subject to the federal regulations listed above and the following: (a) Storage requirements for containers and tanks. (i) Containers must be closed at all times, except when adding or removing materials managed under this section. (ii) Containers and tanks must not be opened, handled, managed or stored in a manner that may cause the container or tank to leak or rupture. 40 CFR §279.22(c) states the following regarding used oil storage: Labels: (1) Containers and aboveground tanks used to store used oil at generator facilities must be labeled or marked clearly with the words "Used Oil." The two yellow buckets (See Photo 11 in Attachment 1) near the south side of the evaporator are used to catch compressor oil. The two yellow buckets should have lids and be labeled in accordance with Chapter 173-303-515(6) WAC.
5/24/2018	WRPS-PER-2018-1327	LERF leachate pumpls Although the manual operation of the pumps is available, identifying a schedule for repair or replacemen	Ecology Dangerous Waste Inspection Letter 18-NWP-082: LERF & ETF Concern 2: The Permit, Part III, LERF & 200 Area ETF OUG-3, Addenda C, C.5.6 Double Liner and Leak Detection, Collection, and Removal System states the following: The fluid level in each leachate sump is required to be maintained below 13 inches to prevent significant liquid backup into the drainage layer. The leachate pump is activated when the liquid level in the sump reaches about 11 inches, and is shut off when the sump liquid level reaches about 7 inches. This operation may be done either manually or automatically. The LERF leachate pumps P-42, P-43, P-44 do not run automatically according to leachate level due to the pumps running "continuously when placed in AUTO mode," which can only leave the manual option available for pumping. Also, the level probes have been documented to be deficient with the statement "Need to replace level probes." This issue was apparently first identified nearly 10 years ago on August 4, 2008. The response Ecology received on March 23, 2018 states the following: ...The evaluation has determined that the repair of the auto pumping feature is a major undertaking which requires removing the leachate pumping system from service. The leachate pumps will continue to be operated manually until they are replaced. Although the manual operation of the pumps is available, identifying a schedule for repair or replacement of the components related to the automatic leachate pump and the leachate level probes should be completed. The Permit, Part III LERF & 200 Area ETF OUG-3, Addenda I Inspection Requirements states "Abnormal conditions identified by an inspection will be corrected on a schedule that prevents hazards to workers, the public, and the environment." and "Problems identified during the inspections are prioritized and addressed in a timely fashion to mitigate health risks to workers, maintain integrity of the TSD units, and prevent hazards to public health and the environment."

5/24/2018	WRPS-PER-2018-1328	Although the alternate route has been set up for receiving into LERF Basin 44, identifying a schedule for repair of the LERF	Ecology Dangerous Waste Inspection Letter 18-NWP-082: LERF & ETF Concern 3: The remedial action noted on the RATL states "EL-10-00224/M EAM (N Planning) Alternate route set up for received into Basin 44. (10-21-17)." This issue was apparently first identified nearly 9 years ago on November 10, 2009. The response Ecology received on March 23, 2018 states the following: ...A Work Order will be initiated to fix the issue if it is determined that the piping section needs to be placed back in service. Although the alternate route has been set up for receiving into LERF Basin 44, identifying a schedule for repair of the LERF Basin 44 primary route should be completed. The Permit; Part III, LERF & 200 Area ETF OUG-3, Addenda I Inspection Requirements states "Abnormal conditions identified by an inspection will be corrected on a schedule that prevents hazards to workers, the public, and the environment." and "Problems identified during the inspections are prioritized and addressed in a timely fashion to mitigate health risks to workers, maintain integrity of the TSD units, and prevent hazards to public health and the environment."
5/24/2018	WRPS-PER-2018-1330	222-S FCA label found with corner peeling	During a walk down of Radiological Postings at 222-S in support of assessment for Posting/Labeling/RMAs/FCAs FY2018-ESHQ-MD-0351, an FCA Posting for FCA-S-222-010 (1) was found with one corner pealing.
5/24/2018	WRPS-PER-2018-1249	UX302A Pumping Operations Cost Analysis	A portion of the liquid contents in the UX-302A Catch Tank are annually pumped to a Polar Tank truck for subsequent transfer to a Double Shell Tank. The pumping is necessary prior to reaching the level of 10.5 inches (equivalent to approximately 883 gallons). The recent cost of pumping the catch tank n 2017 was approximately $252,000. The costs were provided by the ST Team Area Manager. The annual cost of the catch tank pumping effort is the highlighted issue.

5/24/2018	WRPS-PER-2018-1332	Review of Radiological Determination for Work Order 393549	During performance of Work Order 393549; Replace SOV-60B-051 the following was noted: The compressed air line being worked on provides compressed air to the process side of the fine filter. The fine filter is a potentially contaminated system. There is not a check valve that provides an engineered control between the contaminated system and the non-contaminated system. This creates the possibility of the non-contaminated air line to become potentially contaminated. The work was screened as low risk radiological work, but contaminated or potentially contaminated was not checked on the screening sheet.
5/24/2018	WRPS-PER-2018-1333	Flammable Gas Monitoring Procedure Reference	During the Effectiveness review for WRPS-PER-2017-0645, an opportunity for improvement was identified to reference TFC-ESHQ-FP-STD-05, Flammable Gas Monitoring, in the ignition control program procedures TFC-ENG-FACSUP-P-17 and TFC-ENG-STD-13 as the standard to be met if controls are developed that rely on flammable gas monitoring.
5/24/2018	WRPS-PER-2018-1331	Weather Damage to WIDS Site Barriers	The foam barriers at WIDS sites 241-U-151 diversion box and 241-U-152 diversion box are weather damaged. see attachments.

5/24/2018	WRPS-PER-2018-1334	Revise RPP-TE-58464 after completion of FY18 corrosion testing work if needed	The 27 Double-Shell Tanks (DSTs) supernatant were evaluated for pitting propensity using the draft pitting factor equation in RPP-TE-58464, Evaluation of Double-Shell Tank Supernatant Chemistry to Draft Pitting Factor. Of the 27 DSTs, four tanks (AN-102, AN-107, AP-106, and AW-103) were identified as having a pitting factor value between 1 and 2, where pitting may or may not occur. RPP-TE-58464 concluded that no immediate actions were recommended for these four tanks. Corrosion testing is planned and currently ongoing this fiscal year with focus on these tanks to confirm the results from RPP-TE-58464. If testing results indicate otherwise, the technical evaluation will need to be revised and appropriate actions will be taken. This PER is to ensure the corrosion testing results will be evaluated against RPP-TE-58464 and the evaluation will be revised if needed.
5/24/2018	WRPS-PER-2018-1329	Flammable Gas Controls Implementation Documents	AC 5.8.2, Flammable Gas Controls, and the associated ignition control program have different controls for installed equipment and for manned work activities. Per AC 5.8.2, "Installed equipment shall have been verified to meet ignition controls except for ... equipment that is de-energized..." and for manned work activities "Ignition controls shall be implemented for manned work activities involving any tank, pit, vault, waste transfer system, or gas-trapping equipment to which this SAC is applicable..." Controls for manned work activities are implemented through screening the work activity via TFC-ENG-FACSUP-P-17 and TFC-ENG-STD-13 while controls for installed equipment are implemented through design in accordance with TFC-ENG-STD-45. During performance of the effectiveness review for WRPS-PER-2017-0645, Work Order 378632, "6241V Temporary Power Install for Cross Site Leak Detection System Testing," was reviewed and some issues were identified. This work order has not yet been worked in the field and the identified issues do not represent a non-compliance but rather provide an opportunity to communicate lessons learned for similar work in the future should it arise. In discussing this work order, it is worth noting that the cross-site transfer system is currently an inactive waste transfer system as defined in AC 5.8.2. During implementation of the safety basis amendment for ignition controls, it was understood that the installed encasement leak detection system may not be fully compliant with the Class I, Division 1 classification that was determined for unvented encasements. A decision was therefore made to ensure that the system was de-energized and administratively locked out in accordance with AC 5.8.2. This represents the current starting conditions for the above work order. While the ignition control screening process of the manned work activities in accordance with TFC-ENG-FACSUP-P-17 was performed as required, the recognition that the leak detectors are installed equipment subject to verification of compliance in accordance with TFC-ENG-STD-45 appears to have been overlooked by the project team in preparing this preliminary work package as part of the overall project. This package is unusual or possibly unique in that it involves re-energizing inactive installed equipment. The modification traveler for the project does recognize both sets of requirements and actually contains explicit requirements for meeting the design and verification requirements of TFC-ENG-STD-45 for installed equipment. Performance of any work to re-energize the cross-site transfer system leak detectors or any other de-energized equipment installed in a classified location must deal with the requirements for both installed equipment and conduct of the manned work activity. Generally, this will mean verifying and documenting compliance of the installed equipment with the relevant classification prior to re-energizing the equipment. Alternatively, developing a strategy to clearly separate limited duration manned work activities from the extended duration qualification of installed equipment and/or developing a strategy to re-classify the cross-site encasement based on presence of nitrogen blanket should be pursued. While this type of activity is somewhat rare and unusual, communication of lessons learned from this work package review may be beneficial.
5/29/2018	WRPS-PER-2018-1336	Shutdown Thin Film Dryer and performed Rotor flush per ETF-60J-001	**Shutdown Thin Film Dryer and performed Rotor flush per ETF-60J-001, Section 5.11. 0140 hours, at step 5.11.42 STT Operator docked Flush Drum to Dryer. CRO proceeded to step 5.11.43 to open AOV60J155, and was watching for temperature spike to confirm if any sludge dropped into drum. Prior to opening AOV60J155 CRO verified Amperage was less than 9.5. Actual was 8.9 Amps. At this time, STT Operator and CRO observed water coming from drum while docked to TFD. Approx. 5-10 gallons spilled to floor and sump. Water was hot and is evaporating quickly. Some sludge material leaked out with water. Spill Log updated. •After this occurred started looking into possible causes. AOV60J160 drain from TFD Vessel may possibly be plugged. No indication of Sump 1 indicating potential plugging was identified. Further review of Historian may be necessary

5/29/2018	WRPS-PER-2018-1335	Revise Parts/Material List to follow directions in TFC-ENG-STD-10 section 3.16 and Attachment F.	ECN-713840-Rev 0 pages 21 and 25 revise the Parts/Material List. The continuation pages show changes that do not follow TFC-ENG-STD-10 Section 3.16 and Attachment F.
5/29/2018	WRPS-PER-2018-1337	Bentley notified WRPS of software critical errors 874191 affecting Bentley AutoPIPE	Bentley notified WRPS of software critical errors 874191 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, Subsection NB for Class 1 components and piping.
5/29/2018	WRPS-PER-2018-1339	Issues identified in WRPS-MOP-2018-1553	The following issues were identified in WRPS-MOP-2018-1553. These issues were first documented in WRPS-PER-2018-1325 but some were findings and others were observations or opportunities for improvement (OFI). This PER documents the findings, WRPS-PER-2018-1340 was initiated to document the observations or OFIs. WRPS-PER-2018-1325 should be linked to this PER. 1. Requirement: If for any reason a page is skipped or only partially completed, draw a diagonal line through the unused section, sign or initial, and date the line drawn. Issue: Several pages in the new green logbook did not utilize the back of the page (left side). The pages had a single diagonal line drawn through them, however they were not initialed/signed or dated. 2. Requirement: For continuous logbooks, begin each new page with a header, and each new day with a line, containing the date, shift, and name of the responsible log keeper. Issue: At least one page in the new green logbook did not begin the page with a header containing the shift and name of the log keeper. 3. Requirement: Review the following logbooks each shift, ensuring their adequacy, accuracy, completeness, timeliness, and conformance with management direction. (7.1.6).b. Initial or sign in the logbook. Issue: It could not be confirmed that The ETF Control Room logbook is being reviewed each shift as required by TFC-OPS-OPER-C-17. 4. Requirement: Ensure new logbooks are labeled with the position or facility to which it is assigned, the beginning date of use, and the next sequential unique identification number. Issue: The current ETF Control Room logbook was assigned a unique identifier (number) but it was not the next sequential number. When the ETF switched from the yellow logbooks to the green logbooks the sequential log number skipped from 73 to 76. This was an error due to the uncertainty of the hand written number on the last yellow log that appeared to be 75 to the individual initiating the green logbook. The procedure states that the log should have a unique identifier and it does, however it is not sequential. Since the new log number (76) was used in the last entry of log 73.

5/29/2018	WRPS-PER-2018-1340	ETF Logbook issues	The following issues were identified in WRPS-MOP-2018-1553. These issues were first documented in WRPS-PER-2018-1325 but some were findings and others were observations or opportunities for improvement (OFI). This PER documents the OFIs, WRPS-PER-2018-1339 documents the findings. WRPS-PER-2018-1325 should be linked to this PER. 1. Issue: Several pages in the new green logbook did not utilize the back of the page (left side). 2. The current ETF Control Room logbook was assigned a unique identifier (number) but it was not the next sequential number. When the ETF switched from the yellow logbooks to the green logbooks the sequential log number skipped from 73 to 76. This was an error due to the uncertainty of the hand written number on the last yellow log that appeared to be 75 to the individual initiating the green logbook.
5/29/2018	WRPS-PER-2018-1338	Carri-Air Use During Stop Work	On 5/15/18 at 0915, a STOP WORK was issued via SOEN message, email and Radio announcement. The message read "Stop Work on use of Scott Carri-Air Resp. equipment until required reading is developed on requirement and proper use of easy-flow regulator and harness. When individual users have completed required reading, they may resume use of Carri-Air equipment. CSM" The radio message also included the verbage " If currently using Carri-Air, stop use immediately". On 5/15/18 at 1218pm, the required reading document was developed and emailed to employees. That day, starting at approximately 6am (in the farm at that time, 4am early start) employees were in A farm for a concrete pour.. and at least one employee was using a Carri-Air respirator (crane operator). He came out for a bottle change at approximately 9:30am (after stop-work) and stated that he was told to NOT stop work because they couldn't stop the concrete pour. (monolithic pour-- stopping was not a safety concern, but would cost the company money). Employees, including those using Carri-Air continued to work, even through lunch without stopping or even pausing for the issued stop work.
5/29/2018	WRPS-PER-2018-1343	During a quality surveillance at 218A, stainless steel piping was found to be stored on carbon steel racks	During a quality surveillance at 218A, stainless steel piping was found to be stored on carbon steel racks, which are dissimilar metals.

5/29/2018	WRPS-PER-2018-1342	Operations Quality Assurance group consider developing written instructions to deal with the NCR logbook, SCAR logbook, and H	1. Section 4.1.22 of "Nonconforming Item Reporting and Control TFC-ESHQ-Q_ADM-C-02, REV B-7" states a QA Engineer will manage and control the original NCR. This is being done by the Operations QA (OQA) group by using an NCR logbook. There are no written instructions on how to do this but only by word of mouth or tribal knowledge. The OQA group should proceduralize or have a desk instruction specifying how to use this documentation process. 2. Section 4.4.8 of the Supplier Corrective Action Report (SCAR) TFC-ESHQ-Q_C-C-05, REV B procedure states to "maintain the validated SCAR as an in-process record". No method is stated of how to do this but the OQA group is using a SCAR logbook. This tool is also being managed by word of mouth with no procedure or desk instruction. 3. The NCR procedure does not address the Hold Tag logbook being utilized by the OQA group. This management tool should also be prodeduralized or have a desk instruction written.
5/29/2018	WRPS-PER-2018-1344	Unsafe loading and unloading of construction bulk respiratory equipment, excluding bottles, on vehicle lift gates.	Unsafe loading and unloading of construction bulk respiratory equipment, excluding bottles, on vehicle lift gates.
5/29/2018	WRPS-PER-2018-1345	Contamination Area (CA) postings at LERF too far apart	Contamination Area (CA) postings surrounding basins at the Liquid Effluent Retention Facility (LERF) and CA area north of LERF basins are spread too far apart. TFC-ESHQ-RP_MON-C-18, Radiological Posting, Attachment A, 7, states "Generally place radiological posting signs approximately every 12.2 meters (40 feet). Radiological posting signs may be placed approximately 30 meters (98 feet) apart when no physical barrier is required, e.g., radiologically controlled areas, underground radioactive material areas, and soil contamination areas." Some of the CA signs are spread an estimated 60 feet. CA postings require physical boundaries therefore 40 feet is the maximum distance that can be between postings.There are some CA signs on outside of the fence on the east road of LERF. These signs are unnecessary because the fence is greater than six feet in height and therefore only necessary at access points. This same requirement can be found in TFC-ESHQ-RP_MON-C-18, Radiological Posting, Attachment A.

5/29/2018	WRPS-PER-2018-1346	TFC-ESHQ-RP_MON-C-15, RMA's not meeting the requirements	TFC-ESHQ-RP_MON-C-15, Radioactive Material Packaging and Labeling, 4.1.4, 5, & 11 require that labels and tags are legible, meet coloring requirements, contain a trefoil and contain radiation levels. The following Radiological Material Areas (RMAs) didn't meet those requirements: WRPS-RMA-084 has items in it that are not tagged or labeled radioactive material. Some items that are labeled and/or tagged have faded to the point where they are illegible. Inappropriate tags have been used on hose barns (e.g. using hose/electrical tie downs as tags). (Production Operations - TF Surveillance BOS-W021 - (b)(6)) WRPS-RMA-025 has items in it that are not tagged or labeled radioactive material. (Production Operations - TF Surveillance BOS-W021 - (b)(6)) WRPS-RMA-063 has faded labels to the point where they illegible. (Production Operations - ETF LE-W001 - (b)(6)) WRPS-RMA-075 has faded labels to the point where they illegible. (Production Operations - ETF LE-W001 - (b)(6)) An extent of condition should be looked at through all RadCon organizations as this is a part of all weekly routine surveillance of RMAs to check for faded labels/tags and to ensure that proper labels/tags are being utilized.
5/29/2018	WRPS-PER-2018-1347	TFC-ESHQ-RP_MON-C-15, RMA's at 222-S not meeting the requirements	TFC-ESHQ-RP_MON-C-15, Radioactive Material Packaging and Labeling, 4.1.4, 5, & 11 require that labels and tags are legible, meet coloring requirements, contain a trefoil and contain radiation levels. The following Radiological Material Areas (RMAs) didn't meet those requirements: WRPS-RMA-084 has items in it that are not tagged or labeled radioactive material. Some items that are labeled and/or tagged have faded to the point where they are illegible. Inappropriate tags have been used on hose barns (e.g. using hose/electrical tie downs as tags). (Production Operations - TF Surveillance BOS-W021 - (b)(6) WRPS-RMA-025 has items in it that are not tagged or labeled radioactive material. (Production Operations - TF Surveillance BOS-W021 - (b)(6)) WRPS-RMA-063 has faded labels to the point where they illegible. (Production Operations - ETF LE-W001 - (b)(6)) WRPS-RMA-075 has faded labels to the point where they illegible. (Production Operations - ETF LE-W001 - "b)(6) An extent of condition should be looked at through all RadCon organizations as this is a part of all weekly routine surveillance of RMAs to check for faded labels/tags and to ensure that proper labels/tags are being utilized.
5/29/2018	WRPS-PER-2018-1349	TFC-ESHQ-RP_MON-C-15, RMA's in Closure & Retrieval not meeting the requirements	TFC-ESHQ-RP_MON-C-15, Radioactive Material Packaging and Labeling, 4.1.4, 5, & 11 require that labels and tags are legible, meet coloring requirements, contain a trefoil and contain radiation levels. The following Radiological Material Areas (RMAs) didn't meet those requirements: WRPS-RMA-084 has items in it that are not tagged or labeled radioactive material. Some items that are labeled and/or tagged have faded to the point where they are illegible. Inappropriate tags have been used on hose barns (e.g. using hose/electrical tie downs as tags). (Production Operations - TF Surveillance BOS-W021 - (b)(6)) WRPS-RMA-025 has items in it that are not tagged or labeled radioactive material. (Production Operations - TF Surveillance BOS-W021 - (b)(6)) WRPS-RMA-063 has faded labels to the point where they illegible. (Production Operations - ETF LE-W001 - (b)(6) WRPS-RMA-075 has faded labels to the point where they illegible. (Production Operations - ETF LE-W001 - (b)(6)) An extent of condition should be looked at through all RadCon organizations as this is a part of all weekly routine surveillance of RMAs to check for faded labels/tags and to ensure that proper labels/tags are being utilized.

5/29/2018	WRPS-PER-2018-1350	TFC-ESHQ-RP_MON-C-15, RMA's in Projects not meeting requirements	**TFC-ESHQ-RP_MON-C-15, Radioactive Material Packaging and Labeling, 4.1.4, 5, & 11 require that labels and tags are legible, meet coloring requirements, contain a trefoil and contain radiation levels. The following Radiological Material Areas (RMAs) didn't meet those requirements:** WRPS-RMA-084 has items in it that are not tagged or labeled radioactive material. Some items that are labeled and/or tagged have faded to the point where they are illegible. Inappropriate tags have been used on hose barns (e.g. using hose/electrical tie downs as tags). (Production Operations - TF Surveillance BOS-W021 - (b)(6)) WRPS-RMA-025 has items in it that are not tagged or labeled radioactive material. (Production Operations - TF Surveillance BOS-W021 - (b)(6)) WRPS-RMA-063 has faded labels to the point where they illegible. (Production Operations - ETF LE-W001 - (b)(6) WRPS-RMA-075 has faded labels to the point where they illegible. (Production Operations - ETF LE-W001 - (b)(6) An extent of condition should be looked at through all RadCon organizations as this is a part of all weekly routine surveillance of RMAs to check for faded labels/tags and to ensure that proper labels/tags are being utilized.
5/29/2018	WRPS-PER-2018-1351	Housekeeping needed around AN Fence line	A walk down of AN Tank fence line revealed several cut and discarded in place radioactive material hose/electrical tie downs. Housekeeping should be performed on these items.
5/29/2018	WRPS-PER-2018-1352	Higher Training and a more hands on approach are needed to help identify and prevent heat stress before it happens.	(b)(6) Focusing on instruments (wet bulb) and not the people working. With the aging work force observing the workers is a little more important than watching the level of instruments. Too often I see (b)(6) huddled around the instruments and not physically checking on workers who do a farm entry or come out of a ARA. They are too reliant on their instruments saying that it isn't hot enough. Today we had 2 people suffer heat stress and the wet bulb never said they were in danger. With all the PPE, signs of heat stress are hidden making it that much more difficult to identify.

5/30/2018	WRPS-PER-2018-1348	parking immediately outside the mask station	During a MOP of the 2704-HV mask station, an ongoing issue was observed related to available parking immediately outside the mask station and other areas associated with 2704-HV. The primary area of concern that continues to be a problem includes a row of "short-term" parking spots adjacent to the mask station. It was noted that these spots were recently posted indicating max of 15 minutes to accommodate workers entering the mask station which has been a long-term safety issue due to other vehicles in these spots which causes extensive and unnecessary congestion during high traffic times. The following vehicles were noted to be in these spots for at least an hour and some most of the day: 7MXP501, G610833R, G412914K, G431093K, G633083K, and G624108H that wasn't even in a parking spot but parked directly in front of a no parking sign. Upon leaving 2704-HV, I observed a total of 33 government vehicles in the main parking lot. Along with all the vehicles incorrectly parked near the mask station, I noted only two government vehicles properly displaying a 360 flag or magnet as required by TFC-ESHG-S-STD-02, Transportation Safety, and one of those two vehicles was the one I was driving. In comparison, I noted three out of eleven vehicles correctly using 360 flags or magnets at 2750E the same day; still extremely lame but a bit better. I've also observed a number of personal vehicles on the east side of 2704-HV in an area marked government vehicles only. Our inability as a management team to effectively and consistently manage simple parking requirements doesn't help demonstrate how well we can manage all the important work WRPS is responsible for.
5/30/2018	WRPS-PER-2018-1353	During the performance of a Scheduled Radiation Survey Task Description (LE-D012) at ETF, contaminated bird feces was discove	During the performance of a Scheduled Radiation Survey Task Description (LE-D012) at ETF, contaminated bird feces was discovered. Total Contamination of; East of Verification Berm (Non-Rad Area): Location # 1: 11,000 dpm/100 cm2 Beta-Gamma and <500 dpm/100 cm2 Alpha No removable contamination was detected. The locations were deconned. Survey results are documented in Survey Simple on survey # LE-1801050.
5/30/2018	WRPS-PER-2018-1354	ETF contamination tumbleweed	During the performance of Scheduled Radiation Survey Task Descriptions (LE-W062 and LE-W098) at ETF, contaminated tumbleweed fragments were discovered. Total Contamination of; Near Catch Basin 42 (Soil Contamination Area): Location # 1: 5,900 dpm/100 cm2 Beta-Gamma and 7 dpm/100 cm2 Alpha, South LERF Perimeter Fence (Soil Contamination Area): Location # 2: 32,000 dpm/100 cm2 Beta-Gamma and <500 dpm/100 cm2 Alpha No removable contamination was detected. The locations were deconned. Survey results are documented in Survey Simple on survey # LE-1801060 and LE-1801063.

5/30/2018	WRPS-PER-2018-1355	Chemical Management	On 5/29/18 a meeting was held with the WRPS Chemical Management POC and the following groups from Maintenance: Work Planning, Craft Support, & Maintenance Programs. The purpose of the meeting was to discuss a potential gap the Chemical Management POC had come across. The Chemical Management POC for WRPS contacted WRPS Work Planning regarding the management of chemicals used for work. The Work Planning group was unable to address the concern without involving other groups, so a meeting was held on 5/29/18, to discuss the concerns from the Chemical Management POC. The POC brought up several examples of material being ordered that has a specific shelf life, and then do to a myriad of factors, the work is not performed before the chemical shelf life expires. This can lead to problems with the disposal, because the chemical alone may be considered hazardous and the intended use (i.e. 2-part epoxy) renders the material and any waste as non-hazardous. Another example is ordering of Never-Seez thread lubricant. A job might order an 8 oz container and only use a few tablespoons. The process to then reuse this container of lubricant for another job and store it is not well-defined or understood. To summarize: the following were the 2 problems identified: * When chemicals are ordered and not used before the shelf-life expires, the process for excessing these chemicals is not understood and/or presents conflicts with chemical hazards. * When not all of a chemical is used for a job, the process to manage the remaining reusable chemical is not understood or defined.
5/30/2018	WRPS-PER-2018-1357	Update SJHA's	Two issues identified: ^JHA for TO-100-052 located on the Facilities - Custodial services website is from 2011. This JHA should be removed from the facilities management website. Provide updated link directing user to the SJHA website. ^SJHA for Janitorial clean-up of rodent droppings was created on 5/4/2016 and is currently outside the 2 year window for standing job hazard analysis. Needs to be updated.
5/30/2018	WRPS-PER-2018-1358	complete prerequisites before starting field work	Opportunity for improvement on following the work steps. Prerequisite work step 4.7 was not completed before field work began. Some changes were made to the routing board to reflect field conditions, however the work step was not followed. The step details that POR104 and POR138 were to be clouded before work began, and they were not.

5/30/2018	WRPS-PER-2018-1360	Application of Engineering Technical Rigor Improvement Tool 2	Application of the Engineering Technical Rigor Improvement Tool to W.O. 311333 identified the following process improvement for consideration for application to the WRPS Engineering Program: The current condition is judged to be adequate and effective, however the following improvements can lead to a strengthened engineering program. An Engineering in-tank video system subject matter expert (SME) has not been assigned. Availability of an SME that has responsibility to ensure video systems and use meet the technical requirements could have prevented this issue. Further consideration should be given to having the proposed SME develop and maintain an engineering video inspection standard. TFC-ENG-FACSUP-CD-22 provides steps for performing Camera/CADD Modeling System (CCMS) estimates of post-retrieval waste volume but video inspections for other purposes, such as tank intrusion, tank integrity, valve pit inspections, and general use inspections does not exist.
5/30/2018	WRPS-PER-2018-1361	Application of Engineering Technical Rigor Improvement Tool	Application of the Engineering Technical Rigor Improvement Tool to ECN-714195 identified the following process improvement for consideration for application to the WRPS Engineering Program: The current condition is judged to be adequate and effective, however the following improvement can lead to a strengthened engineering program. Consideration should be given to adding emphasis to the Project Engineering Qualification process for the need for in-process Work Product Reviews as described in the Survival Guide. Add this topic to the Project Engineer Qualification card
5/30/2018	WRPS-PER-2018-1362	Application of Engineering Technical Rigor Improvement Tool	Application of the Engineering Technical Rigor Improvement Tool to ECN-714195 identified the following process improvement for consideration for application to the WRPS Engineering Program: The current condition is judged to be adequate and effective, however the following improvement can lead to a strengthened engineering program. A lessons learned bulletin should be published describing the value of in-process Work Product Reviews targeted at Project Engineering and Engineering Design functions.

5/30/2018	WRPS-PER-2018-1363	Engineering Technical Rigor Improvement Tool	Application of the Engineering Technical Rigor Improvement Tool to ECN-711608 Rev. 2 identified the following process improvement for consideration for application to the WRPS Engineering Program: The current condition is judged to be adequate and effective, however the following improvement can lead to a strengthened engineering program. Improve project risk identification and management for risks introduced by project decisions on design approaches. Particularly for elements of the design that rely on completion of construction to provide physical location of interface points.
5/30/2018	WRPS-PER-2018-1365	MO-2244 Stairs are not uniform	MO-2244 Personnel Decon Unit (702AZ) has three sets of stairs and none are dimensionally uniform as the first riser is several inches shorter than the next adjacent riser. The first step is approximately 3.5 inch and the next step is approximately 7 inch. The tolerance for adjacent risers is 3/16 inch. Procedure TFC-ESHQ-FP-STD-02 attachment 1 requires stairs to be dimensionally uniform.
5/30/2018	WRPS-PER-2018-1364	Failure to use non-conductive tag lines and using a chainfall in way that it is not intended for.	American Electric was in the process of loading a grout box that had a pump inside onto a float trailer, to transport it to a shield cave. The crew was working under work package number 260741. There were overhead energized power lines to the East outside of AX farm across the road and the lift was taking place inside AX farm just South of AX-102. The work package and JHA required controls to use non-conductive taglines when there is a potential to enter the limited approach boundary (which during this lift there was a potential to enter the LAB). During the lift it was noticed that the grout box being hoisted did not have taglines attached to the it. One of the riggers involved with the lift was observed using the excess chain from one of the chain falls as a tag line to prevent the grout box from rotating.

5/30/2018	WRPS-PER-2018-1366	Unplanned shutdown of POR 126 portable exhauster.	Unplanned shutdown of POR 126 portable exhauster.
5/30/2018	WRPS-PER-2018-1367	The building values need to be verified.	The 2018-Crystal Reporting property value for this building is considerably higher than the 2015 value; current reported value is $3,660,801.31, while the value reported in 2015 was $93,208.72. The building values need to be verified. Inflated building values were reported in 2009 and corrected.
5/31/2018	WRPS-PER-2018-1341	Work Package did not have the appropriate QA Review	During a QA Surveillance (TF-18-QSR-129), on the NACE Coating Inspection Reporting process, one finding was documented on the Work Control process: Work package, WO# 205519, AW- IN PIT HEATING CORE DRILL AW-A & AW-B COVER BLOCKS, was identified for needing support for Pit coating inspection activities. The package was reviewed for NACE inspection support and it was identified that the package wasn't initially approved by WRPS Quality Assurance as required per TFC-OPS-MAINT-C-01, Attachment B. The planner and engineer were notified to stop work activities to correct the issue. The work package was then reviewed by QA and a Pen & Ink change was performed to incorporate QA comments identified during that review. The steps that were affected in the Pen & Ink change had not been performed, so no corrective actions on the work was required. The work commenced after the issue was corrected and the Pen & Ink change and work package was approved by QA. Recommendation: The PER can be tied to PER# WRPS--PER-2018-0821, which was written on a similar issue on work packages not being approved by QA. Current PER actions for WRPS-PER-2018-0821 are being performed to revise the QA section of TFC-OPS-MAINT-C-01, Attachment B, to be more specific on the criteria requiring the QA SME approval to help mitigate these issues from reoccurring.

5/31/2018	WRPS-PER-2018-1371	Tropical Shift Assingment for Heat Stress Mitigation	Heat stress is being mitigated for only HPTs, it should be a concern for the whole group not just a choice few.
5/31/2018	WRPS-PER-2018-1372	Traffic Control on Baltimore While Working at B-Complex	While workers were preparing to enter B-Farm for LOW activities, a considerable amount of traffic was traveling on Baltimore Ave, this traffic was exceeding the posted 15 mph speed limit. A number of workers were standing in close proximity to the road while the traffic was speeding by.
5/31/2018	WRPS-PER-2018-1373	Carry-Air being used in farms	Carry-Air being used in farms

5/31/2018	WRPS-PER-2018-1374	242-A Evaporator DSA (HNF-14755) diesel generator and associated equipment	The 242-A Evaporator DSA (HNF-14755) provides high-level descriptions of the diesel generator and associated equipment (e.g., transfer switch) in multiple places in Chapter 2 of the DSA. In the DSA Executive Summary, it is simply stated that backup power is supplied by the diesel generator. In DSA Chapter 3, the diesel generator is cited as a source flammable liquids within or near the evaporator. Finally, in DSA Chapter 5, disabling the diesel generator and tripping the substation main feed breaker (F8X193) are described as a method for isolating power to the facility. In 2017, WRPS-PER-2017-1870 was written, prior to the EC-07 campaign, and it indicated that the diesel generator and transfer switch would not be available during that campaign and that was acceptable because safety instrumented systems are relied upon to safely shut down the evaporator by returning waste to the feed tank. Therefore, the diesel generator and automatic transfer switch were not required. The corrective action for this PER was to generate a USQD that evaluates a proposed change to Chapter 2 of the 242-A Evaporator DSA that indicates that the diesel generator and transfer switch are not required to be available during evaporator operations. USQD EV-17-1213-D was generated in response to this PER and it authorized DSA page changes to Chapter 2 where text was added indicating that the diesel generator and automatic transfer switch are not required to be available during evaporator operations. Since that time, a decision was made to layup and eventually remove the diesel generator. WRPS-1801971 formally notifies ORP of this decision and states that: "Long term layup of this piece of equipment is being accomplished per TFC-ENG-FACSUP-D-29 and has been addressed with the ORP technical team and the Federal Project Director. The 242-A Evaporator was originally designed with an emergency generator to supply back-up power to equipment essential to safe shutdown of the facility in the event of loss of power. Since 2014, the 242-A Evaporator has been reconfigured with a safety interlock system to ensure fail safe operation in the event of a loss of power. The State of Washington, Department of Ecology approved the request for a Class 2 modification to remove the requirement for the diesel generator from the Resource Conservation and Recovery Act permit on November 16, 2017. In accordance with WAC 173-303-840(8)(b), this modification became effective December 16, 2017. Given that the diesel generator is electrically isolated, will not be restored to service, and will eventually removed, the descriptions and discussions of the diesel generator and associated equipment such as the transfer switch in the 242-A Evaporator DSA should be revised to reflect those facts. Even though text was added indicating that the diesel generator and transfer switch are not required to be available during evaporator operations, there is still the implication that the equipment could be restored to service and made available. Note that the status of the diesel generator was confirmed by the electrical engineer associated with the layup plan.
5/31/2018	WRPS-PER-2018-1376	TFC-ESHQ-ENV_RM-C-14 revision recommendation	Quality requirements are flowed from TFC-PLN-02 directly into Environmental Planning documents (Environmental Management System Description, TFC-PLN-123 and Quality Assurance Program Plan for Tank Farm Contractor Radioactive Air Emissions, TFC-PLN-71) as well as several environmental standards (Environmental Assessment Process, TFC-ESHQ-ENV-STD-09) . TFC-PLN-02 and TFC-PLN-71 flow into the environmental programs for radionuclide emissions (Air Quality - Radioactive Emissions, TFC-ESHQ-ENV-STD-03 and Air Program Plan, TFC-ESHQ-ENV-STD-11); however, they were not adequately referenced in the Radiologically Controlled Guzzler Excavation at Tank Farms, TFC-ESHQ-ENV_RM-C-14. TFC-ESHQ-ENV_RM-C-14 refers to WAC 246-247-075, which requires licensees to have a program to implement NQA-01. WRPS's program plan for the implementation of NQA-01 is TFC-PLN-02, which rolls up applicable quality requirements. TFC-ESHQ-ENV_RM-C-14 needs to refer to TFC-PLN-02 and TFC-PLN-71 in order to properly flow requirements.
5/31/2018	WRPS-PER-2018-1375	Microshield error in data	Microshield is a software program that allows personnel to estimate dose rates and radiological activity. The producer of Microshield, Grove Software, notified WRPS management that through their own evaluation process an error in data produced by the program is occurring. This external (from WRPS) review determined that the flux to dose conversion factors (DCFs) for the ICRP 74 H*10 dose results in MicroShield v11 are incorrect for some photon energies. Note that the ICRP 74 H*10 dose results are the only results impacted. These results are only accessed through the software Dose Equivalent Report and the ~80 DCFs and remaining dose results calculated by MicroShield are not affected. All other results, including those found on the default Case Summary screen are not impacted. No other versions of MicroShield are impacted by this issue.

5/31/2018	WRPS-PER-2018-1378	SST Retrieval CACN exempt overtime discrepancies	During a mop of exempt overtime associated with SST Retrieval CACN's several discrepancies were identified. 37 individual exempt overtimes were reviewed which were identified on a report provided to Level 1 managers. The review was conducted against the requirements established in TFC-BSM-HR_AT-C-04. Discrepancies fell into five categories. 1. The Manager identified in the TIS PIC/OT Approver Box was not always the approving Level 1 or delegate. 2. The Level 1 or delegate Manager approving the overtime was not always the "cognizant" Level 1 Manager assuming the "cognizant" Level 1 Manager is the Level 1 assigned to the CACN. 3. Adequate detail supporting the work performed was not always provided in the comments section. 4. Comments provided rarely addressed the necessary justification to meet eligible criteria for the compensable overtime. 5. Not all comments in TIS provided narrative relating to the OAT supported if associated with an OAT.
5/31/2018	WRPS-PER-2018-1377	Assessment of Equipment Held for Future Projects	During performance of annual assessment of Equipment Held for Future Projects (EHFFP), WRPS Property Management identified two(2) Findings and one(1) Observation: Finding #1 – Property/equipment on seven(7) EHFFP approvals was removed from storage and deployed to a project without notification to Property Management for EHFFP record closeout or cancellation. Finding #2 – Nine(9) instances where Program Managers/POCs were reassigned within the company that no longer had involvement in EHFFP without transferring assignment or duties to another POC and updating EHFFP. Observation #1 – A significant amount of time was expended by WRPS Project to obtain maintenance reports for equipment stored in 2101M by MSA. MSA process assigns a catalog ID number to each item to catalog storage, but there is no communication from MSA to the owner of item or to Property Management and no cross-reference to their number to assist in the effort to find items stored within their system. There is also no connection to acquisition CatIDs assigned by WRPS. WRPS-MOP-2018-1635 was been generated to document this issue.
5/31/2018	WRPS-PER-2018-1379	RPP-CALC-62139, "Equipment Loads to SX Tank Farms Structures" use of MathCAD issues	RPP-CALC-62139, "Equipment Loads to SX Tank Farms Structures" made extensive use of MathCAD and some of the higher MathCAD functions. The MAthCAD functions were used to create inputs for STAAD Pro. The check of the document verified that the MathCAD functions worked properly by randomly check some of the outputs. In this particular calculation there was a concern that the higher functions were utilized by the originating engineer. This was not true and the checker was able to check the document in accordance with TFC-ENG-DESIGN-C-10.During the Review of RPP-CALC-61293, it was discovered that RPP-CALC-61104, "Outrigger and Vehicle Loads Versus Buried Pipe Capacities", did use some of the higher MathCAD functions, particularly integrals. The check of this document stated that he used an alternate method to check the results, which is allowed by TFC-ENG-DESIGN-C-10, as well as checking the formula in MathCAD against a known solved problem set. This increased rigor of checking the formulas in MathCAD against a known problem aided in the rigorousness of the calculation.The Calculation Checklist (A-6006-215) line h requires that: Hand and MathCAD calculations were verified, including review and correct input data are used, formulae correctly interpret intended expressions, correct units used and results reasonable and appropriate.When higher functions in MathCAD are used if the above check is performed a checker may not be thorough enough. The Hanford Information System Inventory (HISI) entry for MathCAD, HISI 1916 (attached) states:The key benefit of MathCAD is that it is able to display the calculation in standard mathematical notation similar to if the calculation had been written out by hand. This feature enables MathCAD calculations to be readily checked by hand for each use. This HISI entry of MathCAD supports the basic use and functionality of MathCAD across WRPS for use in calculations for either general service or safety significant applications. Calculations performed using MathCAD under this HISI entry must be checked for each use in accordance with TFC-ENG-DESIGN-C-10. Calculations performed using MathCAD that cannot be readily checked for each use because they use MathCAD's more advanced features or which contain macros or other internal programming functions, must be separately registered in HISI and treated as Custom Software in accordance with TFC-BSM-IRM-HS-C-01.This seems to imply that use of the higher functions requires either a separate registration in HISI or a much more detailed check, possibly an alternate calculation. This should be evaluated to determine if the Calculation Checklist should be changed or if the HISI entry should be modified.

6/1/2018	WRPS-PER-2018-1380	Pipe spool damaged during mobilization	Damage to a green tagged pipe spool during mobilization to final position.
6/2/2018	WRPS-PER-2018-1381	ETF AC Alarm LERF LCU No ARP for this alarm	AC ALRM LERF LCU (AC FAIL) alarm has been periodically received in the Control Room and immediately clears. Alarm TAG description should drive the NCD to obtain applicable Alarm Response Procedure (ARP) for follow up actions. Unable to locate an ARP for this alarm tag. Review of ETF-ARP-68-001 (TEDF), ETF-ARP-60M-001 (LERF), and ETF-ARP-55-001 (MCS) does not provide an alarm response. ETF-ARP-68-001 (TEDF) has similar alarm tags for the associated LCU's and is probably the starting point for addition of similar alarm response for ETF-ARP-60M-001.
6/3/2018	WRPS-PER-2018-1383	TFC-ESHQ-ENV-STD-15 MOP	TFC-ESHQ-ENV-STD-15, Section 4.2 states Environmental Managers responsibility is "Ensure records are retained as required by TFC-BSM-TQ-MGT-C-04". Section 4.6 states "Training organization is responsible for "Maintaining records as required by TFC-BSM-TQ_C-04". Note that these two documents are not included in EMSD Section 7.2 References. Evaluate whether these two references should be added to PLN 123. The above 2 referenced documents no longer exist. Writing this MOP and an affiliated PER to raise awareness and to have the document references removed from TFC-ESHQ-ENV-STD-15.

6/3/2018	WRPS-PER-2018-1384	Leak detectors AW02A-LD-192, AW02D-LD-197 and AWB-LD-208 not functioning	While performing WO#393932 242A Perform Start and Test VFD (SC-PB2-1) and Valve Line Up pre-requisites step 4.9 directs an operator to ensure leak detectors AW02A-LD-192, AW02D-LD-197 and AWB-LD-208 are reserved and operable. Upon performing this step the OE/Operator discovered the LDE where in alarm (showed green but and object error indicated a leak). Contacted (b)(6) to help troubleshoot the LDE from the HMI (See Mr. (b)(6) recommendation below).
6/3/2018	WRPS-PER-2018-1385	ETF Key box access	Since dayshift shift office (Room107) has been locked indefinitely during backshift hours there is no access to facility key box for govt vehicles, utvs and forklifts. Although ETF is a 24hr essential facility, the dayshift shift office is only manned during the normal 4-10 Monday through Thursday schedule, which leaves no access to the facility vehicle key box for the majority of shift operations.
6/3/2018	WRPS-PER-2018-1386	ETF Door latches defective	Multiple door latches/knobs in Facility are defective. Latches have been an issue for sometime and was entered into facility safety logbook in February with no corrective actions to date. Some latches are lever type that are difficult to open and could result in possible wrist injury. One door in particular is Fire Door FDR 131-1 which is the main entry and exit door to process floor.

6/4/2018	WRPS-PER-2018-0957	Drawing error identified on H-2-98990 sheet 1, rev 20	drawing error identified on H-2-98990 sheet 1, rev 20. Duplex strainer F-C-3 and valve 2-40A is not drawn correctly, it appears to show that the filter is on the drain line. Should be drawn similar to the duplex strain F-H-3 and siamesed valve HV-H-1B.
6/4/2018	WRPS-PER-2018-1387	ETF Bird Contamination 5/30/18	During the performance of a Scheduled Radiation Survey Task Description (LE-D012) at ETF, several spots of contaminated bird feces were discovered. Total Contamination of; Surge Berm (Radiological Buffer Area): Locations # 1-5: 2,000 - 5,000 dpm/100 cm2 Beta-Gamma and <500 dpm/100 cm2 Alpha, No removable contamination was detected. The locations were deconned. Survey results are documented in Survey Simple on survey # LE-1801072
6/4/2018	WRPS-PER-2018-1382	222-S Work Package Documentation Status Verification	The Respiratory Protection Form (RPF) for the vent & balance work in tunnels T-7 & T-8 was expired (5/18/18) and the RPF for the sump inspection had to be revised for accuracy on the level of allowed equipment to be used (removed APR use as RWP S-810 did not allow APR in HCA).

6/4/2018	WRPS-PER-2018-1388	AZ102 Leak Detection Pit Needs to be Pumped	AZ102 Leak Detection Pit Level is 27.5" which is above its maximum authorized limit of 23" per OSD-T-151-00007.
6/4/2018	WRPS-PER-2018-1389	219-S Fallstop Beam Clamp Inspections	The Fallstop beam clamp installed in 219-S does not have a current annual inspection. The beam clamp was installed in 2010, but has never been used. Upon review of the Tractel Fallstop user manual, the clamp requires an inspection by a qualified person at least once per year.
6/4/2018	WRPS-PER-2018-1356	ETF Drill May 1, 2018 - Radiological Postings	On May 1, 2018 WRPS Security and Emergency Services (SESO conducted an emergency preparedness drill to evaluate emergency response actions involving a man down with contamination event that impacted the Effluent Treatment Facility/Liquid Effluent Retention Facility (ETF/LERF). During the course of the drill the drill participants identified the following Suggestion which pertains to EP-Program Element 8, Facilities and Equipment. The signs that were posted to denote the radiological buffer area (RBA) were the wrong signs. The signs were for dose survey and should have been for contamination survey. (P/E 8.1) Facilities and Equipment

6/4/2018	WRPS-PER-2018-1359	Supplies for a response to an event at the LERF Basins	On May 1, 2018 WRPS Security and Emergency Services (SES) conducted an emergency preparedness drill to evaluate emergency response actions involving a man down with contamination event that impacted the Effluent Treatment Facility/Liquid Effluent Retention Facility (ETF/LERF). During the drill hot wash the drill participants identified the following Suggestion which pertains to EP-Program Element 8, Facilities and Equipment. ETF personnel suggested that a "job box" or other location could be stocked with supplies for a response to an event at the LERF Basins. The location could be stocked with barrier rope, stanchions, walking sticks, etc. The supplies should not be adversely effected by weather conditions (e.g., heat, cold). (P/E 8.12) Facilities and Equipment
6/4/2018	WRPS-PER-2018-1390	APFP-RW-V-208 Failure	While performing a flush of the AZ102 waste transfer system, post recirculation, it was discovered that after initiating water flow in 801-AP approximately 3 gallons of water flowed through the system before flow stopped without any operator action.
6/4/2018	WRPS-PER-2018-1394	Radiological Postings Outside AY-1 Change Trailer	AY gate (south of AY1 trailer): Configuration of the radiological zones had shifted, but the posting at the gate was incorrect. Half of the entry into the farm, using that gate, is currently an RA/CA, but the posting was showing an RMA, URMA and RBA at the entire entrance. Consistent findings of incorrect or missing posting.

6/4/2018	WRPS-PER-2018-1391	Property/equipment on seven(7) EHFFP approvals was removed from storage and deployed to a project without notification to Pro	During performance of annual assessment of Equipment Held for Future Projects (EHFFP), WRPS Property Management identified the following Finding: Finding #1 – Property/equipment on seven(7) EHFFP approvals was removed from storage and deployed to a project without notification to Property Management for EHFFP record closeout or cancellation.
6/4/2018	WRPS-PER-2018-1393	A significant amount of time was expended by WRPS Project to obtain maintenance reports for equipment stored in 2101M by MSA	During performance of annual assessment of Equipment Held for Future Projects (EHFFP), WRPS Property Management identified the following Observation: Observation #1 – A significant amount of time was expended by WRPS Project to obtain maintenance reports for equipment stored in 2101M by MSA. MSA process assigns a catalog ID number to each item to catalog storage, but there is no communication from MSA to the owner of item or to Property Management and no cross-reference to their number to assist in the effort to find items stored within their system. There is also no connection to acquisition CatIDs assigned by WRPS. WRPS-MOP-2018-1635 was been generated to document this issue.
6/4/2018	WRPS-PER-2018-1392	Nine(9) instances where Program Managers/POCs were reassigned within the company that no longer had involvement in EHFFP	During performance of annual assessment of Equipment Held for Future Projects (EHFFP), WRPS Property Management identified the following Finding: Finding #2 – Nine(9) instances where Program Managers/POCs were reassigned within the company that no longer had involvement in EHFFP without transferring assignment or duties to another POC and updating EHFFP.

6/4/2018	WRPS-PER-2018-1395	Bios Primary Flowmeter M&TE Reading Out-of-Tolerance	Bios Primary Flowmeter, Model# DEFENDER 510-H, Serial # 136910 (M&TE# 817-28-03-040) "As Found" reading during calibration was Out-Of-Tolerance. It was adjusted to manufacturer spec.
6/5/2018	WRPS-PER-2018-1396	During the job coverage for a work activity at LERF Basins 43 & 44, contaminated tumbleweed fragments were discovered by an H	During the job coverage for a work activity at LERF Basins 43 & 44, contaminated tumbleweed fragments were discovered by an HPT. Total Contamination of; LERF Basin work area (Radiological Material Area / Soil Contamination Area): Location # 1: 104,500 dpm/100 cm2 Beta-Gamma and <500 dpm/100 cm2 Alpha, No removable contamination was detected. The locations were deconned. Survey results are documented in Survey Simple on survey # LE-1801104
6/5/2018	WRPS-PER-2018-1397	During the performance of a Scheduled Radiation Survey Task Description (LE-W095) at ETF, contaminated tumbleweed fragments	During the performance of a Scheduled Radiation Survey Task Description (LE-W095) at ETF, contaminated tumbleweed fragments were discovered. Total Contamination of; South of MO-587 (Contamination Area): Location # 1: 92,020 dpm/100 cm2 Beta-Gamma and 56 dpm/100 cm2 Alpha No removable contamination was detected. The locations were deconned. Survey results are documented in Survey Simple on survey # LE-1801099

6/5/2018	WRPS-PER-2018-1399	SOW contains technical requirements	According to an engineer that visited me on this, requisition 311275 was let for a temporary painter's shop. I was shown excerpts of the statement of work. The excerpts contain design requirements for the shop. This is in violation of current procedures and engineering practice. The SOW is not to contain technical requirements, but should reference released engineering standards or specifications that contain the technical requirements. TFC-BSM-CP_CPR-C-06 Section 4.4 Step 17 requires the engineer involved with the procurement to ensure requirements are contained in specifications or other engineering documents (with examples listed). TFC-ENG-DESIGN-C-34 should also have been utilized. In addition, SOWs that require design are intended to go through DESENG via the DRA, which did not apparently happen. This is where such errors are generally caught. In review of the requirements, the engineer pointed out potential additional technical requirements that might be required other than those shown. The building is occupied and will host activities involving vapors (a potential personnel safety issue). The correct means of conveying and approving the technical requirements for this building would have been an engineering specification. No such specification appears to have been prepared.
6/5/2018	WRPS-PER-2018-1400	ETF Fire Door 131-1 has an Exit sign on both sides of the door.	ETF Fire Door 131-1 has an Exit sign on both sides of the door. The Exit sign should not be on the Room 125A side and should be removed or covered at the earliest reasonable opportunity. (Reference attached Email (Incorrect Exit Sign Needs to be Removed.msg) which contains comments from the WRPS Fire Protection Subject Matter Expert)
6/5/2018	WRPS-PER-2018-1216	EP-PE 12 - Protective Actions	EP-PE 12 - Protective Actions On April 12th 2018, Emergency Preparedness conducted a Field Drill that included 222-S Complex ERO personnel and a simulated aircraft crash the threatened the 222-S Building (EM-222S-FD-2018-04-01). During the course of the drill the evaluation team identified the following suggestion: During the drill take cover accountability process, the Personnel Accountability Aid (PAA) was unable to confirm the daily schedule for the assigned 222-S facility DOE Fac Rep. During the drill calls to the Fac Rep cell phone were not able to determine positive accountability.

6/5/2018	WRPS-PER-2018-1214	EP-PE 3 - Training and Drills	EP-PE 3 - Training and Drills On April 12th 2018, Emergency Preparedness conducted a Field Drill that included 222-S Complex ERO personnel and a simulated aircraft crash that threatened the 222-S Building (EM-222S-FD-2018-04-01). During the course of the drill the evaluation team identified the following suggestion: During drill play personnel released from the staging area were instructed to stay clear of all drill activities when returning to their normal work locations however several personnel walked through the event scene response hindering drill play.
6/5/2018	WRPS-PER-2018-1213	EP-PE 9 - Categorization and Classification	EP-PE 9 -Categorization and Classification On April 12th 2018, Emergency Preparedness conducted a Field Drill that included 222-S Complex ERO personnel and a simulated aircraft crash that threatened the 222-S Building (EM-222S-FD-2018-04-01). During the course of the drill the evaluation team identified the following suggestion: The BED verbally declared the event EAL in the ICP and the ICP Communicator was directed by the BED to complete the declaration process with the EOC Shift Office prior to the BED signing the concurrence in the RLEP 1.1 checklist.
6/5/2018	WRPS-PER-2018-1401	WRPS-RMA-190 (West of ATCO Building) is consistently found not to comply with TFC-ESHQ-RP_MON-C-18	WRPS-RMA-190 (West of ATCO Building) is consistently found not to comply with TFC-ESHQ-RP_MON-C-18 (Rev. D-12), "Radiological Posting". Barriers are found to be dragging on the ground, posting signage is spaced too far apart or missing on some sides, material expected to be considered as Radioactive is lacking any labeling as such. This RMA has trucks with flatbeds going in and out of it regularly.

6/5/2018	WRPS-PER-2018-1402	Data Quality Objectives (DQOs) are identified by at least 5 different document numbering systems.	Data Quality Objectives (DQOs) are identified by at least 5 different document numbering systems. Four of these are not consistent with the identification system specified in TFC-ENG-CHEM-C-16 and TFC-ENG-DESIGN-C-25. According to TFC-ENG-DESIGN-C-25, DQOs should be identified as RPP-RPT but these documents are not really a report. It is suggested that as part of a process improvement that a new document system be implemented such as RPP-DQO-XX to specify DQO documents. It is also suggested that all DQOS that are current be renumbered with the new identification system. This would enable DQOs to be quickly identified and also identify those that are current.
6/6/2018	WRPS-PER-2018-1404	Scheduled Radiation Survey Task Description (LE-D012) at ETF, contaminated bird feces was discovered.	During the performance of a Scheduled Radiation Survey Task Description (LE-D012) at ETF, contaminated bird feces was discovered. Total Contamination of; Outside the NE Corner of 2025ED (Non-Rad Area): Location # 1: 6,500 dpm/100 cm2 Beta-Gamma and 14 dpm/100 cm2 Alpha No removable contamination was detected. The location was deconned. Survey results are documented in Survey Simple on survey # LE-1801094.
6/6/2018	WRPS-PER-2018-1405	Vapor body pressure was slightly out of range during Evaporator start up at ETF	The ETF DOE Fac Rep mentioned to the SOM at 1330 hrs on 6/5/18 that when he was observing Evaporator startup shortly after 0800 hrs in the morning he noticed the Evaporator was taken to RUN when the vapor body pressure was slightly out of range (slightly greater than the 22-23 in WC specified in step 5.6.17 in procedure ETF-601-003 Rev A-8). The startup went problem free and no abnormal consequences were observed despite startup when the pressure was out of range.

6/6/2018	WRPS-PER-2018-1314	A review of the GD Environmental Supplies draft Quality Assurance Manual	A review of the GD Environmental Supplies draft Quality Assurance Manual was performed in anticipation of possible future use of this supplier. The review found the described QA program, to have deficiencies and omissions which will need to be addressed for this to be a viable long-term supplier to WRPS. These concerns have been passed along to GD Environmental with recommendations for improvement. This PER is being generated for information and supplier tracking purposes only. It is recommended it be classified as Trend Only.
6/6/2018	WRPS-PER-2018-1406	VOIDed drawing H-14-107046-2 rev 10	I was contacted by an engineer on the VOIDed drawing H-14-107046-2 rev 10. This drawing was released on 6/04/18 as a VOIDed drawing. During the incorporation of ECN-713516 revision 1 drawing H-14-107046-02 revision 10 was inadvertently VOIDed instead of H-14-107426-02 revision 2.
6/6/2018	WRPS-PER-2018-1407	WRPS LOTO Surveillance	TITLE of PER: WRPS Should Evaluate the Inclusion of LOTO Precursors to Performance Indicators Report Number: 18014-TF Oversight Title: WRPS LOTO Surveillance The U.S. Department of Energy, Office of River Protection (ORP), Tank Farms Operations Division (TOD) conducted a surveillance of Lockout/Tagout (LOTO) performance at Tank Farms facilities managed by Washington River Protection Solutions, LLC (WRPS). Requirements Reviewed: DOE-O336, Rev 2-B, Hanford Site Lockout/Tagout Procedure 18014-TF-001-WRPS Should Evaluate the Inclusion of LOTO Precursors to Performance Indicators (Scrabeck) Discussion: In October, 2017, LOTO precursors were removed from the calculation of the LOTO Performance Indicator out of concerns that they may be unduly weighted and unnecessarily drive the PI into the adverse region. Coincident with this, with DOE O 232.2A becoming effective, the changes to criteria for reporting ORPS LOTO occurrences further resulted in significant lowering of the LOTO PI, for the same levels of LOTO performance. These two events combined result in the possibility of low level trends being masked, which hampers corrective actions and could lead to larger issues. The opportunity for improvement exists for WRPS to improve the monitoring or LOTO performance and support objective to improve performance and prevent the development of adverse trends, by evaluating the reintroduction of LOTO precursors to the quantitative PI process. If doing so, this should be done in a manner that would both ensure that the low level issues are not given undue relative weight in relation to higher level events, and not unnecessarily drive the indicator into the adverse region on a small number of precursors alone, therefore ensuring that staff remain encouraged to identify these low level issues. REF: TOD Weekly 05-29-18; B Scrabeck; OFI; 18014-TF

6/6/2018	WRPS-PER-2018-1408	Improvements Could Be Made to eLogs Electronic Tool to Facilitate Management Reviews and	TITLE of PER: Improvements Could Be Made to eLogs Electronic Tool to Facilitate Management Reviews and Access to Records Scope: Review a sampling of Operations eTools and the operations procedures that implement their use. Determine if procedures appropriately identify use of applicable eTools and eTools are meeting operations and record keeping requirements. Requirements Reviewed: DOE O 422.1, Conduct of Operations TFC-PLN-05, REV F-8, Conduct of Operations Implementation Plan TFC-OPS-OPER-C-01, TSR Compliance TFC-OPS-OPER-C-07, Turnover of Shift Responsibility TFC-OPS-OPER-C-10, REV B-30, Vehicle and Dome Load Control in Tank Farm Facilities TFC-OPS-OPER-C-11, Equipment Temporary Modifications and Bypasses TFC-OPS-OPER-C-17, Operating Logbooks TFC-OPS-OPER-C-40, Timely Instructions/Orders TFC-OPS-OPER-C-60, Surveillance Rounds ---------- Issue Type: OFI (Opportunity for Improvement) Significance Level: 0 Statement: 18243-TF-O01, Improvements Could Be Made to eLogs Electronic Tool to Facilitate Management Reviews and Access to Records (Patel)
6/6/2018	WRPS-PER-2018-1409	WRPS Should Consider Adding a User Guide for the eLogs Electronic Tool	TITLE of PER: WRPS Should Consider Adding a User Guide for the eLogs Electronic Tool Scope: Review a sampling of Operations eTools and the operations procedures that implement their use. Determine if procedures appropriately identify use of applicable eTools and eTools are meeting operations and record keeping requirements. Requirements Reviewed: DOE O 422.1, Conduct of Operations TFC-PLN-05, REV F-8, Conduct of Operations Implementation Plan TFC-OPS-OPER-C-01, TSR Compliance TFC-OPS-OPER-C-07, Turnover of Shift Responsibility TFC-OPS-OPER-C-10, REV B-30, Vehicle and Dome Load Control in Tank Farm Facilities TFC-OPS-OPER-C-11, Equipment Temporary Modifications and Bypasses TFC-OPS-OPER-C-17, Operating Logbooks TFC-OPS-OPER-C-40, Timely Instructions/Orders TFC-OPS-OPER-C-60, Surveillance Rounds ---------- Issue Type: OFI (Opportunity for Improvement) Significance Level: 0 Statement: 18243-TF-O02, WRPS Should Consider Adding a User Guide for the eLogs Electronic Tool (Patel) Discussion: The various eTools created and used by WRPS have a variety of help documents and user guides, ranging from videos, to PDFs, to RPP documents. The help button (question mark icon) for eLogs links to TFC-OPS-OPER-C-17, Operating Logbooks, rather than linking to a more comprehensive guide. Although helpful for understanding the process and requirements for log keeping, the procedure does not provide the user information on how to use the software.
6/6/2018	WRPS-PER-2018-1398	ETF (b)(6) boot contamination after entering PFP RBA during surveillances	An ETF HPT accompanied ETF Operations over to the TEDF Pump Station #1 (225W) which is located inside the PFP Radiological Buffer Area (RBA). RWP # TF-129 controls access to the PFP RBA and part of those controls require Hand & Foot surveys prior to entering the building and prior to entering the vehicle. During a Hand & Foot survey of one of the workers prior to re-entering the vehicle, the HPT discovered 21 dpm/100 cm2 Alpha contamination and no beta-gamma contamination on the bottom of one of the shoes.

6/6/2018	WRPS-PER-2018-1403	222-S HEPA vacuum procedure forms not is work package	On May 25, 2018 Construction forces along with 2225 personnel used a Radiologically controlled HEPA vacuum in the Duct level unaware of procedures and forms that should have been included in the work pkg. The concerns raised where: ATS-LO-161-146, section 1.1: 222-S Environmental was not able to provide assistance for a HEPA vacuum cleaner used outside of a HEPA-ventilated facility (e.g. duct level) ATS-LO-161-145, section 5.0: Environmental review is required (not completed) before using a HEPA vacuum outside of a HEPA-ventilated facility (e.g. duct level) ATS-LO-161-145, section 6.1.2: There is question as to whether or not a Data Sheet 1 – HEPA Vacuum Usage (site form A-6005-960) was completed for a HEPA vacuum used outside of a HEPA-ventilated facility (e.g. duct level) TFC-ESHQ-ENV_RM-P-11, starting at section 4.1.6 and continuing through section 4.2 details steps that needed to be performed for last Friday's use of a HEPA vacuum.
6/6/2018	WRPS-PER-2018-1410	Installation of the LERF basin pump was not performed in accordance with the issued design.	Installation of the LERF basin pump was not performed in accordance with the issued design. ECN-714225 requires the installation of a fiberglass rod and reel to facilitate future pump removal. Contrary to this requirement the pump was installed without the fiberglass rod and reel.
6/6/2018	WRPS-PER-2018-1411	WRPS-RMA-197 (shield cave west of AX Farm parking lot) was out of compliance with TFC-ESHQ-RP_MON-C-18	WRPS-RMA-197 (shield cave west of AX Farm parking lot) was out of compliance with TFC-ESHQ-RP_MON-C-18 (Rev. D-12), "Radiological Posting". Barriers/signage were found too low, posting signage was spaced too far apart or lying on the ground, some areas within the posted Radiation Area/Radiological Material Area were double posted. This RMA has had posting problems fairly regularly.

6/6/2018	WRPS-PER-2018-1413	Phase 2 Pilot Scale VMDS test report	The Phase 2 Pilot-Scale VMDS test report (RPP-RPT-60386 Rev.0) identified a number of path forward recommendations associated with engineering /project activities required to implement the VMDS equipment. A summary of these recommendations will be provided as an attachment to this PER in both Text and Table format. The recommendations need to be compared to FY planning basis to make sure the actions necessary to satisfy the recommendations are implemented either as part of the VMDS farm engineering controls system or for fugitive emissions source and/or plume tracking efforts. There is no longer technology development activities and the projects/program and/or engineering based work needs to be performed prior to scheduled field deployment in the FY19 planning baseline. The Phase 2 Pilot-Scale test report is in the legal/clearance process and cannot be attached to this PER but can be made available to the assigned individuals responsible for PER closure/completion (contact (b)(6) at 509 (b)(6)).
6/6/2018	WRPS-PER-2018-1412	C Farm boot contamination	On the Day Shift morning of 6/6/18, work was being performed in the 241-C Farm Contamination Area (CA) demobilizing electrical equipment. No loose contamination was detected during job coverage surveys. Following completion of the morning work, the crew doffed PPE at the Middle C Egress Tent and were surveyed and release by the Argos APM units. The last person to egress was (b)(6) who trailed the group in order to replace the full laundry bag. When surveyed by the APM, it alarmed on the sole of the left safety boot. The HPT confirmed the presence of contamination, identified the location as the small area where the heel strikes the surface, and quantified the activity as 20,000 DPM/100 cm sq. beta-gamma located entirely under one probe area using a GM and standard correction factor of 10. Alpha surveys were performed of the same area and no alpha contamination was detected.
6/6/2018	WRPS-PER-2018-1414	Waste Stream Profile Attachment Removed	A Waste Stream Profile is required for waste transfers into the DST system per RPP-29002 and WAC 173-303-300. However, the Waste Stream Profile (WSP) does not exist as a site form and a native file can not be located. The WSP was previously included as an attachment in revision 0 of RPP-29002. When the document was revised in 2012, the attachment was removed. Additionally, there is no procedure or guidance on how to create, complete and approve the WSP. There is no clear understanding of who is responsible for generating and approving the WSP.

6/7/2018	WRPS-PER-2018-1415	222-S Waste analysis procedures mixed	Waste from one procedure was inadvertently mixed with a waste stream from another procedure. The morning of 6/6/18, while collecting waste for liquid disposal to 219-S, a WHL chemical technologist noticed a 1 gallon waste container in room 4C Hood 11 that did not look normal to her - it had a distinct color gradient associated with it. It was bright orange on the top and yellow on the bottom. Since sometimes tank sample contribution can result in coloration and layering of waste (not compatible with 219-S), the bottle was inspected closer and lightly swirled to see if the colors combined. During this process the stratified colors combined – indicating that no physical layer existed. After further inquiry it was determined that the initial color stratification was due to waste from one procedure (Test Plan WHL-TPRO-044) being inadvertently mixed with a waste stream from two cyanide analysis procedures (LA-695-102, LA-695-103). Both waste streams were well documented and compatibility reviews had been performed separately on them prior to mixing. WHL management assigned two chemists to complete a new compatibility review on the combined waste container. Evaluation from the compatibility review indicated there is no incompatibility between constituents in the new waste stream.
6/7/2018	WRPS-PER-2018-1416	(SmartPlant Foundation (SPF) HISI #2742")RPP-DCAF-62340 had Manager signature and wouldn't advance	When checking on workflow progress of RPP-DCAF-62340 found that Responsible Engineering Manager had recorded signature yet the workflow did not advance.
6/7/2018	WRPS-PER-2018-1417	On 5/10/2018, WRPS Security and Emergency Services (SES) conducted an emergency preparedness drill	On 5/10/2018, WRPS Security and Emergency Services (SES) conducted an emergency preparedness drill to evaluate emergency response actions involving an aircraft crash at the 242-A Evaporator that impacted the Tank Farms and 242-A Evaporator. During the course of the drill, the evaluation team identified the following "Suggestion" which pertains to EP-Program Element 6 "Emergency Response Organization". The On-Call ICP Hazards Communicator was unable to be contacted during the drill. Due to drill time constraints the BED was given credit for making contact. The BED clearly understood the activation process and was ready to make additional notifications until the position would be filled. After further investigation Post Drill, the ICP Hazards Communicator had transferred the On-Call cell phone number to personal cell phone and inadvertently left the personal cell phone in the other room during the night.

6/7/2018	WRPS-PER-2018-1435	Currently "IH" is used to represent different roles multiple times within the permit.	Currently "IH" is used to represent different roles multiple times within the permit. This ambiguity is confusing to the affected workers. When filling out Section 13 of Form A-6006-202 (Beryllium Work Permit) in the special instructions, the use of approved acronyms would help clearly communicate to the affected workers in the field on the roles and responsibilities for the coverage of the Beryllium work being performed under the beryllium work permit discussed in the Pre-Job Evaluation. Example Beryllium Work Permit Number WRPS-AW03-17-01
6/7/2018	WRPS-PER-2018-1434	The center handrail at the main entrance to 2750 deflects(wobbles) 2 to 3 inches in each direction.	The center handrail at the main entrance to 2750 deflects(wobbles) 2 to 3 inches in each direction. It appears this same handrail was entered into the EAPC Safety Notebook last year (5-16-17) and either was never fixed or the fix did not work. The rail deflects enough that it may warrant immediate attention (take out of service or fix). (See attached video)
6/7/2018	WRPS-PER-2018-1436	SY-A Train primary tank exhauster, 2nd stage HEPA filter was reported as having failed challenge testing.	SY-A Train primary tank exhauster, 2nd stage HEPA filter was reported as having failed challenge testing.

6/7/2018	WRPS-PER-2018-1437	The Tank Farm Safety Programmable System (TFSPS)	The Tank Farm Safety Programmable System (TFSPS) is being commissioned to provide safety indication of annulus level, freeze protection, and DST ventilation flow. The system is still in commissioning and has not been turned over for Operational use. During off-line system testing, the TFSPS annunciator light test was found to cause some off normal conditions in the annunciators. The off normal conditions included; (1) the different tank farm annunciators would sometimes get out of sequence; and (2) the test sequence would trip the audit bit for the freeze fault lights, causing the fault light to activate. The annunciator out of sequence condition was found to occur if the push-to-test button was initiated too quickly before all the PLCs could read the IO card data. The error condition is self-identifying since it prevents the light test from being completed, and the out of sequence farm alarm lights remain energized after completion of the test. The freeze fault alarm has an audit function that verifies the redundant outputs to the annunciator are in agreement, and results in an alarm condition if they disagree. The annunciator light test checks each of the redundant outputs individually, which causes the fault alarm to go into alarm during the test. The error condition is self-identifying since the freeze fault alarm condition is activated each time the annunciator light test is performed.
6/7/2018	WRPS-PER-2018-1438	Table 1 "Training Assignment Matrix" contained in TFC-ESHQ-ENV-STD-15 (pg 7 of 8) needs updating.	Table 1 "Training Assignment Matrix" contained in TFC-ESHQ-ENV-STD-15 (pg 7 of 8) needs updating.
6/11/2018	WRPS-PER-2018-1439	Omega Thermocouple Probe, Model# JHSS-14E-RSC-18, Serial # N/A (M&TE # 817-78-02-024) "As Found" reading during calibration w	Omega Thermocouple Probe, Model# JHSS-14E-RSC-18, Serial # N/A (M&TE # 817-78-02-024) "As Found" reading during calibration was Out-Of-Tolerance. Opened thermocouple. Item was Rejected.

6/11/2018	WRPS-PER-2018-1440	Performed MBD reset per TFC-ENG-CHEM-D-44 for the AW6 to AW2 waste transfer	Performed MBD reset per TFC-ENG-CHEM-D-44 for the AW6 to AW2 waste transfer. See completed checklist 9 of TO-230-044_D-2.
6/11/2018	WRPS-PER-2018-1451	E-DARF issues	Identified the following processing and release of the E-DARF issues: Uncertainty regarding unincorporated changes prior to release. Found incorrect workflow comments are attached. Uncertainty regarding roles and responsibilities.
6/11/2018	WRPS-PER-2018-1452	RadCon Administrative Procedures Conversion Not Complete	Work begun in 2015 to convert select RadCon administrative procedures to technical procedures was never completed as planned. Review of the paper trail from the issue-originating ORP assessment recommendation through Apparent Cause Analysis, management assessment, PER, corrective actions, and final action plan --- all documenting deliberations regarding recategorization of these administrative procedures' content --- could not identify the specific reasons why the conversion tasks were eventually left undone. [Reference the attached flow diagram of documentation behind this issue, as well as a chart of the 13 procedures in question and summaries of their outcomes relating to the central topic of this MOP.]

6/11/2018	WRPS-PER-2018-1453	Tech Procedure categories have been misapplied	Random sampling of technical procedure history folders shows that categories have been misapplied to most folders/files. Folders should not have any indexing metadata at all. History files should not be shown with an active status. Also the title field is blank in all files checked. The revision numbers were not typed as they appear (e.g., Rev A0 instead of A-0). These errors were also observed in procedures that have been canceled/inactivated. These coding errors need to be corrected to ensure accurate meta-data, as well as enhance search results when using IDMS search functions.
6/11/2018	WRPS-PER-2018-1455	AY-21Change Trailer (MO513) NW stairs are not dimensionally uniform	AY-1Change Trailer (MO513) NW stairs are not dimensionally uniform as the first step is a few inches shorter than the other steps due to the build up of gravel at the stair base. Procedure TFC-ESHQ-FP-STD-02 attachment 1 requires stairs to be dimensionally uniform.
6/12/2018	WRPS-PER-2018-1458	Procedure 5-VT-705 Needs Changes	While performing SSW for an 8 Point LOTO to support WO 326233, 241-AX POR127 Exhaust Fan Check (ENV) the following Procedure Enhancement was discussed. Procedure 5-VT-705 assumes the fan to be inspected is operating as an initial condition. The fan was initially OFF today. In order to follow the procedure we had to start the fan, do initial checks/inspections and then turn off the fan and hang the LOTO and then per step 5.2.5 request operations return the equipment to operable configuration (what ever that is) per applicable operating procedure. This is interpreted to mean "start the fan" since observations are required to complete Steps 9 and 10 on Data Sheet 1. Request evaluating the following procedure enhancements: 1. In the event the fan is initially OFF allow N/A of step 5.1.6 then performing steps 5.1.7 (Hanging LOTO) through 5.2.4 (Remove LOTO) out of sequence then start the fan per step 5.2.5 and perform steps 5.1.1 through 5.1.5 and 5.2.6 through 5.2.8. 2. Vibration, Temperature and RPM readings are not taken in this procedure however other fans take these readings during similar Preventative Maintenance. Should this be added to the procedure?

6/12/2018	WRPS-PER-2018-1418	unclear how TFC-PLN-02 implements Attachment H	TFC-PLN-02 states that it flows-down EM-QA-001, EM Quality Assurance Program requirements in section 2.0.1.e of the Quality Assurance Program Description Overview segment. However, it is currently unclear how TFC-PLN-02 captures and flows down these requirements to implementing document found in Attachment H, Model Development, Use and Validation.
6/12/2018	WRPS-PER-2018-1459	EAPC Safety Book Process Issues	The issues management system for WRPS is established in TFC-ESHQ-Q_C-C-01, Problem Evaluation Request. The issues management system will hereafter be referred to as the PER Process. The PER process requires both the Central Shift Office and the PER Screening team members to review each submitted issue and determine if any immediate actions/compensatory measures need to be put in place to address worker safety or nuclear safety issues until the ultimate solution for the issue can be completed. The immediate actions are then captured in the PER. In addition the PER process has a series of reviews to insure that the corrective action has been taken and the necessary objective evidence has been captured in the PER. In contrast, the EAPC Safety Book process in TFC-ESHQ-S_SAF-C-14, EAPC Safety Book does not address and document the following: • Documentation of immediate actions/compensatory measures taken to address a safety issue until the ultimate solution can be completed • Objective evidence of corrective actions taken appears to be limited to notes in the EAPC Safety Book. There are instances where evidence beyond a closure statement that issue is "fixed" would be important. For example, there is a handrail at the entrance to 2750 that has identified unacceptable deflection 3 times within a year. Having additional information such as the work order that describes what action was taken would be beneficial in determining why this handrail continues to be an issue. Another, example would be if the DOE Office of Enforcement requested objective evidence of corrective action occurring beyond just a closure statement. Attached to this PER is a printout of the EAPC Safety Book(See File: Safety Book Entries.pdf) with annotation. The annotation highlights examples of issues that warrant/warranted documenting what immediate actions were taken if any. In summary, not taking timely immediate/compensatory actions and/or not clearly documenting what actions were taken is an omission in the EAPC Safety Book process that creates a vulnerability for the worker and therefore to WRPS.
6/12/2018	WRPS-PER-2018-1460	mask station trailer ETVS	the mask station trailer ETVS will no longer be used because the mask station staff have decided to lock the doors. Please send out a memo to state this and the reason for this so people will know where the alternative ETVS is, Please have this ETVS removed and move to a new location (possible the women's change trailer and one in the men's change trailer. Personnel from 274AW that park across the street use this ETVS because of traffic and predestination safety because of lack of parking on the 274AW side. Please provide a list of ETVS and where they are located that can be used.

6/12/2018	WRPS-PER-2018-1461	TFC-OPS-OPER-C-24 Does Not Fully Implement DOE O 232.2A	Title: TFC-OPS-OPER-C-24 Does Not Fully Implement DOE O 232.2A Requirements for Updating Reports Description: During a Facility Representative (FR) review comparing the reporting requirements in DOE O 232.2A, "Occurrence Reporting and Processing of Operations Information," to the implementing procedure TFC-OPS-OPER-C-24, "Occurrence Reporting," the FR identified a gap in fully implementing the requirements of Item 3.e in Attachment 4 of the Order. Specifically, Item e, "Update Reports," under Section 3, "Initial Notification," in Attachment 4, "Occurrence Reporting Model," of DOE O 232.2A states, "If a change in categorization or correction of information is needed, information must be provided in the "Updated Report Information" field. Any other updates for Low or Informational Level Reports are optional." This requirement has not been fully implemented in Section 4.6, "Update Reports," of TFC-OPS-OPER-C-24 which currently states that an updated report may require submittal in the Occurrence Reporting and Processing System when (1) degrading or worsening conditions could change an occurrence report's categorization, (2) an occurrence report's submittal timeline is in jeopardy, or (3) when the final report was rejected by the assigned Facility Representative. TFC-OPS-OPER-C-24 does not incorporate the Order's requirement to submit an updated report when correction of information is required.
6/12/2018	WRPS-PER-2018-1486	242-A PB-2 Testing Procedure Failed to Control System Parameters	TITLE of PER: 242-A PB-2 Testing Procedure Failed to Control System Parameters Title: Performed Oversight on 242-A PB-2 VFD Testing Summary: The work was performed to package 393932; 242-A Perform Start and Test VFD (SC-PB2-1) This scope of the work was to perform the starting, testing and securing of the SC-PB2-1 Variable Frequency Drive (VFD) at the 242-A Evaporator and perform 241-AW farm valve line-ups. This work successfully tested the VFD in the local and remote mode, after several test runs. There were issues maintaining seal water flow within specification. The testing and operations crew managed this issue, and other more minor issues well. The testing process involved initiating Seal Water to PB-1 and 2, per TO-600-210, adding approximately 9,000 gallons of raw water to the C-A-1 vessel, and running PB-2. Initially, the water fill process was unsuccessful and the valving was found to be incorrect in the work package. There were 2 iterations of changes required to remedy this situation, resulting in delays. ---------- Issue Type: Finding (Level 3) Significance Level: 1 Statement: Finding: 242-A PB-2 Testing Procedure Failed to Control System Parameters (Priority Level 3)(Ciola 6-5-18) Discussion: PB-2 Variable Frequency Drive (VFD) testing was performed to Work Order 393932; 242-A Perform Start and Test VFD (SC-PB2-1) and Valve Lineup. Operational parameters were not fully discussed in the work document. An example is pump amperage, which must be monitored and limited. In the case of the PB-2 pump, amperage cannot exceed 150 amps. The PB-2 VFD work document did not provide the limitation for pump amps when locally testing the VFD. The procedure also allowed an unlimited number of slurry pump runs, but did not provide a minimum C-A-1 vessel (suction source) level for pump operation. It also did not provide steps allowing the refill of the vessel as needed once the testing was started. DOE O 422.1, "Conduct of Operations" requires that procedures contain explicit parameters. Requirements: DOE O 422.1, "Conduct of Operations," Administrative Change 2, Attachment 2, 2 p (2), "Technical Procedures"
6/12/2018	WRPS-PER-2018-1489	PB-2 Testing Coordination Deficiencies	TITLE of PER: PB-2 Testing Coordination Deficiencies Title: Performed Oversight on 242-A PB-2 VFD Testing Summary: The work was performed to package 393932; 242-A Perform Start and Test VFD (SC-PB2-1) This scope of the work was to perform the starting, testing and securing of the SC-PB2-1 Variable Frequency Drive (VFD) at the 242-A Evaporator and perform 241-AW farm valve line-ups. This work successfully tested the VFD in the local and remote mode, after several test runs. There were issues maintaining seal water flow within specification. The testing and operations crew managed this issue, and other more minor issues well. The testing process involved initiating Seal Water to PB-1 and 2, per TO-600-210, adding approximately 9,000 gallons of raw water to the C-A-1 vessel, and running PB-2. Initially, the water fill process was unsuccessful and the valving was found to be incorrect in the work package. There were 2 iterations of changes required to remedy this situation, resulting in delays. ---------- Issue Type: Finding (Level 3) Significance Level: 1 Statement: PB-2 Testing Coordination Deficiencies (Priority Level 3)(Ciola, 6-4-18) Discussion: PB-2 Variable Frequency Drive (VFD) testing was performed to Work Order 393932; 242-A Perform Start and Test VFD (SC-PB2-1) and Valve Lineup. Step 5.1 required "242-A Shift Manager VERIFY the Shift Production Team is performing AW farm leak detection monitoring prior to the start of PB-2 testing." However, the procedure did not require notification to the Shift Production Team when starting the PB-2 pump and moving liquid to AW-102. There were several iterations of starting PB-2 that spanned over the course of two days. While the Shift Managers recognized the importance of notifying the Central Shift Manager, a procedure step should have ensured these communications occurred prior to this critical work step. DOE O 422.1, "Conduct of Operations," requires close communications during coordination of activities. Similar issues with communication gaps between the 242-A facility and the Central Shift Office occurred in the past, when the PB-2 Administrative Locks were removed without prior communication with the Central Shift Manager. See WRPS-PER-2017-1894. Requirements:

6/12/2018	WRPS-PER-2018-1442	Contrary to TFC-ESHQ-Q_C-C-01, Problem Evaluation Request, Rev. M-8, the problem evaluation report screening process did not	TITLE of PER: Contrary to TFC-ESHQ-Q_C-C-01, Problem Evaluation Request, Rev. M-8, the problem evaluation report screening process did not effectively Purpose and/or Scope: The U.S. Department of Energy, Office of River Protection (ORP), Quality Assurance Division conducted a quality assurance independent surveillance (QAIS) of Washington River Protection Solutions 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 16, "Corrective Action." ---------- 18062-TF-F02 – Contrary to TFC-ESHQ-Q_C-C-01, Problem Evaluation Request, Rev. M-8, the problem evaluation report screening process did not effectively identify potentially recurring issues and flag the issues accordingly in the problem evaluation report system (Priority Level 3, Dunhour, May 30, 2018, IOS No. 18062. Requirements Not Met: 10 CFR 830.122(a)(e), item (1) stated: 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. ASME NQA-1a-2009, Requirement 5, stated in part: Activities affecting quality and services shall be prescribed by and performed in accordance with documented instructions, procedures, or drawings that include or reference appropriate quantitative or qualitative acceptance criteria for determining that prescribed activities have been satisfactorily accomplished. TFC-PLN-02, Rev. I-0, Section 5.1.1, stated in part: Activities affecting quality and services shall be prescribed by and performed in accordance with documented instructions, procedures, or drawings that include or reference appropriate quantitative or qualitative acceptance criteria for determining that prescribed activities have been satisfactorily accomplished. TFC-ESHQ-Q_C-C-01, Rev. M-8, Section 4.6, "PER Screening" and Attachment B, "Screening Team Worksheet," stated in part: 2. Review and evaluate the PERs in the screening packet according to Attachment B – Screening Team Worksheet... If the PER screening team notes potentially recurring issues, indicate "yes". Discussion: A review of PERs screened during the period of review indicates the screening process failed to identify potentially recurring issues even when the PER description, or source document, clearly identified the issues as such. See attached report for Examples. The ORP QAIS team also noted that the applicable PER system data entry field (checkbox) was labeled as "Trend," in lieu of "Potentially Recurring Issue" as suggested by TFC-ESHQ-Q_C-C-01 Appendix B. REF: 18-QAD-0040; F Dunhour; Finding Level 3; 18062-TF
6/12/2018	WRPS-PER-2018-1441	problem evaluation report issues were routinely assigned a significance level lower than "Track Until Fixed" when the issue	TITLE of PER: problem evaluation report issues were routinely assigned a significance level lower than "Track Until Fixed" when the issue Purpose and/or Scope: The U.S. Department of Energy, Office of River Protection (ORP), Quality Assurance Division conducted a quality assurance independent surveillance (QAIS) of Washington River Protection Solutions 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 16, "Corrective Action." ---------- 18062-TF-F01 – Contrary to TFC-ESHQ-Q_C-C-01, Problem Evaluation Request, Rev. M-8, problem evaluation report issues were routinely assigned a significance level lower than "Track Until Fixed" when the issue had been identified as a Price Anderson Amendment Act noncompliance "PAAA, Non-NTS Reportable" (Priority Level 3, Dunhour, May 30, 2018, IOS No. 18062. Requirements Not Met: 10 CFR 830.122(a)(e), "Quality Assurance Criteria," item (1) stated: 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. ASME NQA-1a-2009, Requirement 5, "Instructions, Procedures, and Drawings," stated in part: Activities affecting quality and services shall be prescribed by and performed in accordance with documented instructions, procedures, or drawings that include or reference appropriate quantitative or qualitative acceptance criteria for determining that prescribed activities have been satisfactorily accomplished. TFC-PLN-02, Rev. I-0, Section 5.1, "General," No. 1, stated: Activities affecting quality and services shall be prescribed by and performed in accordance with documented instructions, procedures, or drawings that include or reference appropriate quantitative or qualitative acceptance criteria for determining that prescribed activities have been satisfactorily accomplished. TFC-ESHQ-Q_C-C-01, Rev. M-8, Section 4.11, "TUF - Track until Fixed PERs," and Attachment C, "Screening Criteria / Significance Levels," stated in part: TUF PERs are issues of minor deficiency or non-compliance that require action to resolve, or explanation why "no action" is required. See Attachment C for further definition of a TUF PER... PAAA, Non NTS Reportable" are TUF at a minimum. Discussion: It appears that WRPS did not reconcile their PER significance determination with their PAAA screening results. PERs were screened and assigned significance levels prior to PAAA screening and then not rescreened to adjust the significance level, and PERs have been rescreened to reduce the significance to less than "TUF" in spite of previously identified PAAA noncompliance. For the period of this review, 233 such PERs were assigned the significance level of "Trend Only," 12 were assigned "PIE/CIM," and 13 were identified as "Invalid." REF: TOD Weekly 06-04-18; F Dunhour; Finding Level 3; IOS 18062
6/12/2018	WRPS-PER-2018-1443	WRPS should evaluate the problem evaluation report record format	TITLE of PER: WRPS should evaluate the problem evaluation report record format Purpose and/or Scope: The U.S. Department of Energy, Office of River Protection (ORP), Quality Assurance Division conducted a quality assurance independent surveillance (QAIS) of Washington River Protection Solutions 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 16, "Corrective Action." ---------- 18062-TF-001 – WRPS should evaluate the problem evaluation report record format and supporting data process to ensure that quality assurance record content accurately reflects the problem evaluation report process information, as applied (Dunhour, May 30, 2018, IOS No. 18062. Discussion: Records misidentified the PER screening chair, reflecting the data entry person, in lieu of the individual responsible for the PER screening determination. REF: TOD Weekly 06-04-18;F Dunhour; OFI; IOS 18062

6/12/2018	WRPS-PER-2018-1444	WRPS should document the identification of cause(s) for problems assigned significance level "Track until Fixed"	TITLE of PER: WRPS should document the identification of cause(s) for problems assigned significance level "Track until Fixed" Purpose and/or Scope: The U.S. Department of Energy, Office of River Protection (ORP), Quality Assurance Division conducted a quality assurance independent surveillance (QAIS) of Washington River Protection Solutions 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 16, "Corrective Action." ---------- 18062-TF-O02 – WRPS should document the identification of cause(s) for problems assigned significance level "Track until Fixed" (Dunhour, May 30, 2018, IOS No. 18062. Discussion: TFC-ESHQ-Q_C-C-01, Section 4.11, and Attachment C defined a TUF as "an issue where the cause is known and corrective actions are readily identifiable;" however, the PER process required no inputs, discussion, or documentation to ensure or validate that TUF issues meet this criterion. It should be noted that the identification of cause for this purpose may or may not necessarily be useful for other purposes (e.g., trending), or be suitable for comingling with cause data resulting from analysis REF: TOD Weekly 06-04-18; F Dunhour; OFI; IOS 18062
6/12/2018	WRPS-PER-2018-1445	WRPS should evaluate the canned "PER Screening Report" for data record output and printable report format/content	TITLE of PER: WRPS should evaluate the canned "PER Screening Report" for data record output and printable report format/content Purpose and/or Scope: The U.S. Department of Energy, Office of River Protection (ORP), Quality Assurance Division conducted a quality assurance independent surveillance (QAIS) of Washington River Protection Solutions 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 16, "Corrective Action." ---------- 18062-TF-O03 – WRPS should evaluate the canned "PER Screening Report" for data record output and printable report format/content (Dunhour, May 30, 2018, IOS No. 18062. Discussion: This canned report may no longer be in routine use, perhaps having been supplanted by the PER screening batch report; however, the record content of these reports did not appear to match when running in a similar timeframe. Additionally, the printable version of the canned report appeared to label data fields inconsistent with the printable PER records (e.g., identifying "additional actions taken" in lieu of "Describe Actions Taken or Recommended"). This data field is output from the shift operations review, whereas the data field "Immediate Actions Taken or Planned" (from the originator) may be just as important for screening purposes. REF: TOD Weekly 06-04-18; F Dunhour; OFI; IOS 18062
6/12/2018	WRPS-PER-2018-1492	ECN-711667, Rev 1 was released on 1/15/18 as Work Completed without the field work actually being completed	ECN-711667, Rev 1 was released on 1/15/18 as Work Completed without the field work actually being completed and without a Modification Work Completed Approval signature. This ECN is currently being worked in the field (see WO# 378939) and requires revision. However, it is not possible to revise a Work Completed ECN. ECN-711667, Rev 1 has been incorporated on drawings H-2-131086, Sheet 4, Rev 5 and H-14-020106, Sheet 1, Rev 15. This appears to be an extent of condition related to WRPS-PER-2018-0502.

6/12/2018	WRPS-PER-2018-1491	materials delivered from the warehouse to 222-S labeled with the incorrect contract numbers identified	Two instances have occurred in the last couple weeks of materials delivered from the warehouse to 222-S labeled with the incorrect contract numbers identified. The first case was conductivity standards for CHPRC mixed with expected material for a contract. The second case had materials delivered to 222-S labeled **with the incorrect contract number causing the material to be delivered to the incorrect point of contact.** **Details of each cases:** Materials expected for contract 64736 arrived at 227-S. Upon arrival it was noted more boxes than expected had arrived. Upon further inspection 1 of the 8 boxes were the expected materials for contract 64736 the other 7 boxes were chemical standards. The packaging slip (see attachment) was found on one of the 7 **extra boxes identifying PO 66245 for PRC.** A box arrived at the 222-S laboratory with contract 64239 identified. The box was then taken to the point of contact for that contract. The POC was not expecting materials associated with the contract and upon opening the box verified the contents were not something for contract 64239. After some investigation the top label was carefully pulled back to reveal a different contract number (see attachment : 2 contract box picture). The box was then taken to the point of contact for contract 64736 and was identified as expected materials for that contact.
6/12/2018	WRPS-PER-2018-1493	Procedures TFC-ENG-DESIGN-C-52, Technical Reviews and TFC-ENG-DESIGN-P-54 are in conflict	Procedures TFC-ENG-DESIGN-C-52, Technical Reviews and TFC-ENG-DESIGN-P-54 are in conflict. DESIGN C-52 section 4.1 Checking, says Checking is required for all technical baseline engineering documents...Checking is accomplished by following this procedure and having the document checked in accordance with DESIGN P-54. DESIGN_P_54 Section 1.0, States that this procedure provides standard work process for checking of engineering documents...it lists the type of documents that shall be checked but does not say that they are technical baseline. As stated in Section 1.0 this procedure is performed in accordance with DESIGN C-52 and if you follow C-25 you have to go through C-52 to get to P-54. It is unclear if the intent is for all engineering documents to be checked using these procedures or just technical baseline. C-25, 4.3 Document Preparation, step 4 says "Using the controlling procedure and TFC ENG DESIGN-C-52 as required, identify independent document reviews and approvals and/or technical reviews (e.g., Checking, Design Verification, etc.):" again nothing about technical baseline. If C-52 only apples to technical baseline then C-25 should just say so and there is not need to go to C-52 if you are not technical baseline.
6/13/2018	WRPS-PER-2018-1457	Valve Operations at ETF	(b)(6) was installing a Locking Device on valve (ECC) for installation of a pressure guage. The system is on the Sanitary Water System and valve 95I-067 was being locked closed. Pressure on the system is approx. 90-100 psi. As (b)(6) was preparing to install the locking device, he inadvertently cracked the ball valve handle in the downward position slightly opening the valve. This sprayed clean sanitary (non-hazardous) water on (b)(6) who then immediately re-closed the valve.

6/13/2018	WRPS-PER-2018-1495	TFC-ENG-DESIGN-P-54 Checklist Does Not Make Sense	TFC-ENG-DESIGN-P-54, Checking of Engineering Documents, Figure 1. Technical Report Checklist, Item No. 1. does not make sense. The checklist says "the following checklist is used by checkers to ensure technical reports are complete and in compliance with engineering procedures". Item 1 says "if revising an existing report, are you starting with the latest approved version of the report obtained from SPF? If you are the checker this question does not make sense, you are not revising the report you are checking it and if you are checking something you would not be checking the latest, approved version you would be checking a draft revision to the latest approved version. So this form has been this way since the procedure was first released (years) so is the form really being used on a regular basis when the first question on the checklist makes no sense? Also the statement at the top of the checklist that says "Required approvers are identified in SPF by placing an asterisk adjacent to the approver" this is not a true statement. The checklist says that it is to ensure compliance with engineering procedures but not one engineering procedure is identified in the checklist.
6/13/2018	WRPS-PER-2018-1446	Periodic Training-Procedure Owners and Functional Area Managers (FAMs)	Periodic Training- Procedure Owners and Functional Area Managers (FAMs) A management-directed assessment, FY2018-OPS-MD-0383 – Administrative Procedure Revision Process was conducted during May 7 – June 27, 2018. During the course of this assessment procedure owners were interviewed and questioned relative to their knowledge of responsibilities as well as for any training received. The majority of procedure owners interviewed said they did not know their responsibilities as contained within TFC-BSM-AD-C-01, Administrative Document Development and Maintenance. Responses included three disclosures that the revisions they make are infrequent. Other responses were that little time is dedicated to reviewing procedures as it is not a primary job task. Procedure owners were also questioned regarding whether documents that could be potentially affected by a procedure revision are listed in their procedure and how to be sure. The lack of confidence received from this question indicated that procedure owners are unaware of systems and resources that provide this function and could use retraining on such.
6/13/2018	WRPS-PER-2018-1447	Guidance for Requirements	Guidance for Requirements A management-directed assessment, FY2018-OPS-MD-0383 – Administrative Procedure Revision Process was conducted during May 7 – June 27, 2018. During the course of this assessment procedure owners were interviewed and questioned relative to their knowledge of responsibilities as well as for any training received. When asked how requirements are identified and adequately flowed down and implemented in their procedure(s) answered ranged from contacting the people down at procedures, checking OSHA's website to see if there are any changes that affect their procedures, periodic reviews, field changes, memorizing quality assurance plans and documents and Department of Energy (DOE) orders, staying updated on Federal Acquisition Regulation (F.A.R.) requirements, and by requesting required readings. These answers are accurate as the resources utilized will vary based on the applicability to the procedures themselves. However there should be a maintained system in place to verify procedures have the correct requirements flowed down within their procedure.

6/13/2018	WRPS-PER-2018-1449	Establish Link to Procedures Training	Establish Link to Procedures Training A management-directed assessment, FY2018-OPS-MD-0383 – Administrative Procedure Revision Process was conducted during May 7 – June 27, 2018. During the course of this assessment procedure owners were interviewed and questioned relative to their knowledge of responsibilities as well as for any training received. Ten of the eleven procedure owners stated in one way or another, as procedures are not a primary day to day function, they are not maintaining their knowledge base of the procedure revision process. Six out of eleven procedure owners stated they would like more accessible information on the procedure revision process, such as instructions on use of Workflow Review & Approvals Process (WRAP), who to contact for procedure questions, and what their specific responsibilities are. Although this information may be on the website in one place or another it is important to make it easily accessible to ensure procedure owners, Functional Area Managers (FAMs) and anyone involved in the procedure revision process can find what they need to do their job successfully.
6/13/2018	WRPS-PER-2018-1496	Non-Conformance for Electrical racks procured from Columbia Energy	Electrical racks procured from Columbia Energy and Environmental Services under contract 64019 for installation into AX Farm were required to meet approved design drawings. The electrical racks were received in the fall of 2017 and have been stored in the marshaling yard. Recently the racks were turned over to construction for installation into AX farm. During this process the construction contractor noticed that some of the components of the electrical racks were not per the approved design.
6/13/2018	WRPS-PER-2018-1497	intern pay rates being entered incorrectly into PeopleSoft during the hire process	Staffing discovered an issue with intern pay rates being entered incorrectly into PeopleSoft during the hire process. The Service Contract Act (SCA) requires that employers offer a fringe benefit amount of $4.41 to the base hourly rate of all interns, which MSA Payroll does automatically through the payroll system. During the discovery, it was found that the staffing clerk was including the $4.41 in the total hourly rate being entered into PeopleSoft, instead of the base hourly rate, which created a duplicate payment of $4.41. This caused WRPS to have to recover these overpaid funds from the affected interns through deductions from their paychecks.

6/13/2018	WRPS-PER-2018-1499	RPP-CALC-52569 Discrepancies	RPP-CALC-52569 was issued in 2012 to evaluate the anchorage of anchorage of trailers used on the Hanford Reservation. A horizontal wind load of 5835 lb. was calculated on page 21 of the calculation. On page 22 and subsequent pages, the value is repeated as 5285 lb. This is reduction of approximately 10 percent in the load. The number of anchors required is not changed by this error, but the calculation has been referenced in calculations for other anchorage methods and could result in underdesign of those anchorage systems.
6/13/2018	WRPS-PER-2018-1500	Configuration Control Issue for flush trucks purchased from outside vendors	Currently flush trucks being purchased from outside vendors and used to flush Enrafs and De-Entrainers, are not being screened by engineering ensuring required configuration per ECN-725324 R1 prior to use.
6/13/2018	WRPS-PER-2018-1501	no specific and environmentally approved method for winterization of flush trucks	Currently there is no specific and environmentally approved method for winterization of flush trucks used in AW Tank Farm for protection against freezing.

6/13/2018	WRPS-PER-2018-1503	Valves Found Out-of-Position in AW Farm	at approximately 15:35 on 6/12/18, AW primary exhauster was running on the B side filter bank when it unexpectedly shut down because of the low-low dp interlock. No personnel were inside the farm at the time of the event and the low tank pressure alarm did activate.
6/13/2018	WRPS-PER-2018-1502	Contaminated tumbleweed fragments found outside of B Farm	At approximately 9:20am this morning, while performing the monthly routine perimeter survey of B-Farm, (4) small spots of contamination approximately 3 square ft. area was identified on the South East fence line. No Alpha contamination was detected and the Beta-Gamma survey results of the (4) spots were as follows: 1. 72,890 dpm/100cm2 2. 49180 dpm/100cm2 3. 42300 dpm/100cm2 4. 20920 dpm/100cm2 Again, No alpha contamination was identified on the (4) spots, and all the readings were direct readings with the dirt/tumbleweed mixture on the ground
6/13/2018	WRPS-PER-2018-1505	noncompliant set of stairs was returned to service	The Crux of this PER is the fact that a noncompliant set of stairs was returned to service. Circumstances preceding this situation include: A WRPS employee hyper extended their knee on a set of metal stairs going into 2418 farm (MO-825) on 03.28.18. The employee was treated at HPMC and released to return to work. The stair landing elevation was 2 inches lower than MO-825 floor level. The tolerance for this measurement is 0.5 inches (per procedure TFC-ESHQ-FP-STD-02 attachment 1). These stairs were danger taped off so that they could not be used. An EAPC safety logbook entry was initiated. WRPS-PER-2018-0741 was written and the EAPC safety logbook entry was closed. The stair landing was raised to within tolerance and the stairs were sloped in an attempt to maintain dimensional uniformity between the stair risers (per procedure TFC-ESHQ-FP-STD-02 attachment 1). The danger tape was removed and the stairs were placed back in service per the daily report on 04.09.2018. The stairs are still NOT compliant with procedure TFC-ESHQ-FP-STD-02 attachment 1. The stairs are NOT dimensionally uniform and are also sloped excessively. The riser height of the bottom riser is approximately 7.5 inches. All other risers are approximately 7 inches. The tolerance for adjacent risers is 3/16 inch. The landing slope is currently 3/8 inch per foot. The tolerance for landing slope is a maximum of 1/4 inch per foot.

6/13/2018	WRPS-PER-2018-1506	TFC-ENG-DESIGN-C-48 Needs Update	Procedure TFC-ENG-DESIGN-C-48 references Procurement Lead Engineer on page 10 of 17. This position is no longer used by our organization.
6/13/2018	WRPS-PER-2018-1512	LOTO Review of TAF 2225-18-052 recommended improvements	LO/TO SME (b)(6) performed an internal review of TAF: 2225-18-052 prior to TAG 10-19 installation swing 6/12/18. Initial review concurred with the TAF methodology. TAGS 10 through 19 from TAF 2225-18-052 were installed swing 6/12/18 (except for TAG 14). After further consideration and consultation with (b)(6) an improved method was identified for TAGS 10, 11, & 12. First thing 6/13/18 Mr. (b)(6) notified 222-S COA and recommended removal of TAGS 10, 11, & 12 and addition of concurrent verification of component position by the Installer & Verifier for the replacement TAGs. (Previous version of TAF had verification of component position as part of the Special Instructions & Safe Condition Checks performed by the electricians familiar with the electrical substation components). No work was authorized or performed under this isolation boundary.
6/13/2018	WRPS-PER-2018-1513	RPP-SPEC-33590 Needs Update	RPP-SPEC-33590 is the DQO that is currently being used as the basis permit required sampling. The DQO is not current and needs an update. It is noted that an update to the document is currently in progress. When the document is revised it should be renumbered to make it consistent with the Engineering document numbering system.

6/13/2018	WRPS-PER-2018-1514	DQOs reviewed found to be inadequate for sampling for a non-rad air permit	A review of DQOs identified that none of the DQOs were adequate to address sampling for the purpose of obtaining a non-rad air permit.
6/13/2018	WRPS-PER-2018-1516	LOTO walk down discovered locks & locking device to have fallen off	During LOTO walk down for TAF CO-18-011 Tag #1 at C241-EDS-BKR-100 the locks and locking device where discovered to have fallen off.
6/13/2018	WRPS-PER-2018-1517	C-Retrieval Trailer Door is very hard to open	C-Retrieval Trailer Door is very hard to open. A person has to push and pull the door a certain way, or the door will not open. Since the door is connected to a card reader, if a worker is not able to figure out how to open the door in 3 seconds, the time-lock will reset.

6/13/2018	WRPS-PER-2018-1518	EAPC Safety Book item - no lighting exiting U and S/SX CA during backshift	EAPC Safety Book item 272WA-008 4/2/18 - over 60 days old - this is a PER entry per procedure to close the EAPC Safety Book item. "On back shift at night we have to enter S, SX and U Farm to perform LOW work. Not only do the lights for the farm not work, where we have to exit the farm through the dress/undress trailer, it is very dark due to the no lighting to see the stairs, this can be very dangerous to tripping because we are on SCBA and cari-air, lights would help provide a clearer path so we can see. It's been like this for years and still not lights." The safety issue is specific to exiting U and S/SX CA during backshift activities and there is no lighting while approaching the trailer to exit. The team has FF respirators on and cannot wear headlamps. There are generally two employees on this task and they are each handling carri-air with 25' hose. The LOW van they take in the farm has on-board external lights for visibility during van maneuver and LOW farm activities, but the van is placed at the exit gate before the employees go to the change trailer to exit the farm, so they are dealing with darkness while approaching the change trailer/stairs to exit. This is also the case when they have to leave the van in place during LOW count to go change out the carri-air bottles inside the trailer as the van cannot be moved during LOW count. U Farm change trailer does not have a porch light inside the CA. S/SX change trailer porch light is inside a vestibule and provides zero light while approaching the change trailer from the CA side (for exiting farms). U farm has operable stadium lighting, but it's far from the CA side porch and lighting is inadequate. SX stadium lighting is not operable but is a priority due to the upcoming SX barrier project.
6/13/2018	WRPS-PER-2018-1519	TEST of PER 4.07 Release - Please Invalidate	TEST of PER 4.07 Release - Please Invalidate
6/14/2018	WRPS-PER-2018-1520	Contaminated Egg Shell	During the performance of a Scheduled Radiation Survey Task Description (LE-D012) at ETF, contaminated bird egg shell was discovered. Total Contamination of; SW Corner 2025ED (Non-Rad Area): Location # 1: 20,170 dpm/100 cm2 Beta-Gamma and <500 dpm/100 cm2 Alpha. No removable contamination was detected. The egg shell was picked up. Survey results are documented in Survey Simple on survey # LE-1801130

6/14/2018	WRPS-PER-2018-1521	Contaminated Bird Feces	During the performance of a Scheduled Radiation Survey Task Description (LE-W095) at ETF, contaminated bird feces was discovered. Total Contamination of; West side of Basin 43 (Non-Rad Area): Location # 1: 38,340 dpm/100 cm2 Beta-Gamma and <500 dpm/100 cm2 Alpha No removable contamination was detected. The locations were deconned. Survey results are documented in Survey Simple on survey # LE-1801155
6/14/2018	WRPS-PER-2018-1522	Contaminated Tumbleweed	During the performance of a Scheduled Radiation Survey Task Description (LE-D012) at ETF, a contaminated tumbleweed was discovered. Total Contamination of; West side of Basin 44 CA (Soil Contamination Area): Location # 1: 44,000 dpm/100 cm2 Beta-Gamma and 14 dpm/100 cm2 Alpha, No removable contamination was detected. The tumbleweed was properly disposed of. Survey results are documented in Survey Simple on survey # LE-1801157
6/14/2018	WRPS-PER-2018-1523	WRPS training program requirements are not implemented consistent with DOE/RL-94-02, DOE O 426.2, and DOE-HDBK-1078-94.	The U.S. Department of Energy (DOE), Richland Operations Office (RL) Emergency Services Information Management Division and DOE Office of River Protection conducted an assessment of the Washington River Protection Solutions LLC Emergency Preparedness Program at the Hanford Site January 24, 2018, through February 15. 2018. The assessment was conducted to meet the requirements of DOE 0 15 1. 1 C, Comprehensive Emergency Management System, and its implementation document at Hanford, DOE/RL-94-02, Hanford Emergency Management Plan. The RL EP Program Manager was the assessment team lead and was assisted by Mission Support Alliance, LLC EP subject matter experts. Field work activities for the assessment included staff interviews, facility walk-downs, observations at two drills and a review of relevant documentation.. Two findings, four suggestions, and three strengths were identified for Washington River Protection Solutions LLC. ---------- F-01 WRPS training program requirements are not fully defined or effectively implemented consistent with DOE/RL-94-02, DOE Order 426.2, and DOL-HDBK- 1078-94. DOE/RL-94-02 states "a comprehensive, coordinated, and documented program of training and drills for developing and/or maintaining specific emergency response capabilities shall be an integral part of the Hanford Site emergency management program... .Training programs should be systematic and performance based (i.e., based on the analysis of tasks to be performed during an emergency) and developed using performance objectives that place emphasis on team training and facility-specific emergency response scenarios." As addressed in the WRPS 2015 Triennial Assessment, DOE Order 426.2, Personnel Selection, Training, Qualification and Certification Requirements for DOE Nuclear Facilities, states "the operating contractor must establish an administrative procedure that describes the methods used to administer and document exceptions to initial training program requirements."' Although this Order does not specify elements for determining course-to- course equivalency, it does reference "personnel. ...w ho have satisfactorily completed equivalent training programs comparable in content and performance standards..." WRPS continues to grant course-to-course equivalencies. However, WRPS has not clearly defined and implemented a viable process for this type of equivalency. DOE-HDBK- 1078-94 outlines the steps to be documented when developing training. According to DGE-HDBK- 1078-94, "'Training program records should be maintained to permit review of content, schedules, and current and past program results. They should be located, organized, and indexed for ease of retrieval. Training program records should include the following: most recent job and task analysis data used in training program development; course schedules; lesson plans and tests; trainee attendance summaries (name, course, dates, and test results); instructor evaluations; and reports of program audits and evaluations." WRPS implements the Systematic Approach to Training (SAT) process in TFC-BSM-TQADD-C-0l, Conduct of Training Administration procedure. The WRPS procedure does not clearly identify which documents should be located in the training program record. Without training documentation there is no documented basis for the training ,evaluations, selection of objectives, or documentation that training materials were approved for use. Documentation requirements have not been defined or established.

6/14/2018	WRPS-PER-2018-1525	Emergency Equipment Inventory	A review of emergency equipment identified in facility BEPs and surveillance records was performed and compared to the actual field condition of emergency equipment. The review and walk down indicated that although emergency equipment is identified and a routine surveillance performed, processes and procedures do not ensure an accurate list of emergency equipment is available or maintained. ---------- FINDING F-02 TF-COMS-00 1 is not adequately written or effectively implemented to ensure emergency equipment is documented, inventoried, and maintained in a ready state. BACKGROUND In accordance with DOE/RL-94-02, personal protective equipment (PPE) and other equipment and supplies shall be available and operable to meet emergency preparedness requirements and for emergency response personnel to carry out their respective duties and responsibilities. In addition, emergency equipment shall be inventoried in accordance with contractor procedures to ensure availability in the event of an emergency. The observations below indicate the readiness of emergency equipment cannot be assured. TF-COMS-001 does not provide sufficient direction to ensure emergency equipment is properly inspected. For example: The procedure does not require the inspector to open and inspect equipment if the safety seal is intact and within the expiration date on the seal. Six first-aid kits at multiple WRPS facilities were randomly selected for review. All had safety seals intact but some were lacking dates and some had dates written that did not correlate with an expiration date of the products inside. The first-aid kits were then opened up confirming products (antibiotic ointment) had been stored beyond their expiration date. The procedure does not provide direction on how to address equipment that is not accessible at the time of the surveillance. As a result, equipment was not inspected monthly as required. For example, no documented surveillances of first aid kits for MO-252 and MO-253 were available for January, April, May, or June 2017. Emergency equipment identified in TF-COMS-001 and RPP-27869 was not current. For example, the BEP identifies the radiological response vehicle (car 11), diesel generator (241-AZ-70 1) and Public Address (PAX) as emergency equipment, but the diesel generator and the PAX at 272-AW are no long inconsistencies exist between the emergency equipment identified in the BEP and the equipment requiring surveillance in TF-COMS-001 (i.e., automated external defibrillators, burn kits, EP equipment/supply trailer, bull horns). February and March 2017 Equipment and Surveillance Inspection records for MO-252 and MO-253 were reportedly lost. A new process was established for Central Operations Services to scan hardcopy records ,generated from TF-COMS- 001; however, this process has not been formalized in the procedure.
6/14/2018	WRPS-PER-2018-1524	Work Package was not Ops Accepted in a timely manner	Environmental PM EL-031446 was missed. This PM is a 90 day inspection of the LERF Basin Cover. Work package 381186 was due on 3/4/18 and was field work completed on 3/13/18, however the package was not Ops Accepted until 6-11-18. The EAM system relies on the Ops Accepted status to update the PM to the next due date based on the last completed date (3-13) + the frequency (90 day) = next due date (6-11). This means that the PM was again due on the date that the March package was Ops Accepted. The delay in Ops Accepting this work order caused the facility to miss the 6-11-18 required performance, as there was no time to plan/schedule/or work the next package. This PM is currently on a float cycle. This means that another work package cannot be generated until the existing one is Op Accepted.
6/14/2018	WRPS-PER-2018-1515	AW Bottle Trailer damage	While opening up the bottle trailer at AW farm one of the NCOs noticed damage to the side of the trailer that appeared to be caused by some type of vehicle. The NCO notified TFP management and sent pictures of the damage to the trailer. The damage occurred sometime between 11:30 and 1430 hours on the day of discovery.

6/14/2018	WRPS-PER-2018-1526	TFC-PLN-085/TFC-ESHQ-EP-C-01 roles and responsibilities are not formally documented and easily accessible.	The U.S. Department of Energy (DOE), Richland Operations Office (RL) Emergency Services Information Management Division and DOE Office of River Protection conducted an assessment of the Washington River Protection Solutions LLC Emergency Preparedness Program at the Hanford Site January 24, 2018, through February 15, 2018. The assessment was conducted to meet the requirements of DOE 0 15 1. 1 C, Comprehensive Emergency Management System, and its implementation document at Hanford, DOE/RL-94-02, Hanford Emergency Management Plan. The RL EP Program Manager was the assessment team lead and was assisted by Mission Support Alliance, LLC EP subject matter experts. Field work activities for the assessment included staff interviews, facility walk-downs, observations at two drills and a review of relevant documentation.. Two findings, four suggestions, and three strengths were identified for Washington River Protection Solutions LLC. ---------- SUGGESTION S-01 WRPS EP should revise TFC-PLN-085, Emergency Management Program Plan or TFC-ESHQ-EP-C-01, Emergency Management to identify roles and responsibilities for the Security and Emergency Services EP Manager. BACKGROUND A review of WRPS organization charts and performance objectives indicated the WRPS SES EP Manager is the individual designated to administer the emergency management program. However, roles and responsibilities are not formally documented and easily accessible.
6/14/2018	WRPS-PER-2018-1527	WRPS should better define the types of drills used to document initial and ongoing proficiency.	The U.S. Department of Energy (DOE), Richland Operations Office (RL) Emergency Services Information Management Division and DOE Office of River Protection conducted an assessment of the Washington River Protection Solutions LLC Emergency Preparedness Program at the Hanford Site January 24, 2018, through February 15. 2018. The assessment was conducted to meet the requirements of DOE 0 15 1. 1 C, Comprehensive Emergency Management System, and its implementation document at Hanford, DOE/RL-94-02, Hanford Emergency Management Plan. The RL EP Program Manager was the assessment team lead and was assisted by Mission Support Alliance, LLC EP subject matter experts. Field work activities for the assessment included staff interviews, facility walk-downs, observations at two drills and a review of relevant documentation.. Two findings, four suggestions, and three strengths were identified for Washington River Protection Solutions LLC. ---------- SUGGESTION S-02 WRPS should better define the types of drills used to document initial and ongoing proficiency. BACKGROUND The scope of a typical ICP limited drill does not provide event-scene ERG members the opportunity to demonstrate proficiency on the range of responses required in a real event. However, WRPS conducts expanded LCP limited drills to demonstrate ERG member proficiency, including event-scene ERG members, but the scope and applicability of these drills are not defined in contractor procedures. Interviews with WRPS EP personnel indicated these expanded ICP limited drills are not used for initial proficiency of event-scene ERG members, yet instances were identified where this was done. A review of the drill proficiency requirements of TFC-ESHQ-EP-C-02, along with ERO member proficiency records for 2015 through 2017 was performed. The WRPS proficiency criteria contained in TFC-ESHQ-EP-C-02 distinguishes between critical and non-critical tasks and assigns scoring criteria to determine if a proficiency failure exists. TFC-ESHQ-EP-C-02 also requires a Drill Proficiency Review Sheet be completed for new ERG members, when critical objectives have not been met by incumbent ERG members, and for low-hazards facility proficiency evaluations. Review of these review sheets showed they are consistently being used to document ERG member feedback though instances of incomplete documentation (e.g., missing signatures) were noted.
6/14/2018	WRPS-PER-2018-1528	process for addressing drill proficiency issues should be clarified in WRPS procedures	The U.S. Department of Energy (DOE), Richland Operations Office (RL) Emergency Services Information Management Division and DOE Office of River Protection conducted an assessment of the Washington River Protection Solutions LLC Emergency Preparedness Program at the Hanford Site January 24, 2018, through February 15. 2018. The assessment was conducted to meet the requirements of DOE 0 15 1. 1 C, Comprehensive Emergency Management System, and its implementation document at Hanford, DOE/RL-94-02, Hanford Emergency Management Plan. The RL EP Program Manager was the assessment team lead and was assisted by Mission Support Alliance, LLC EP subject matter experts. Field work activities for the assessment included staff interviews, facility walk-downs, observations at two drills and a review of relevant documentation. Two findings, four suggestions, and three strengths were identified for Washington River Protection Solutions LLC. ---------- Suggestion S-03 The process for addressing drill proficiency issues should be clarified in WRPS procedures to ensure consistent implementation and demonstration of proficiency. BACKGROUND TFC-ESHQ-EP-C-02, Attachment E, documents the ERG proficiency evaluation criteria and parameters for determining when a proficiency failure exists (i.e., any one failure of bolded criteria or two-to-four non-bolded criteria depending on the specific ERG position). Attachment E also provides a Drill Proficiency Review Sheet that includes a summary of the ERG member's performance (proficient vs. non-proficient) and the path forward to become proficient (i.e., N/A, review session, re-drill). The procedure requires this review sheet be completed to document a formal review with the ERG member when bolded criteria are not met, but does not provide additional direction in use of the form. Review of completed proficiency evaluation forms and Drill Proficiency Review Sheets identified inconsistencies in implementation. For example, six instances were identified where an ERG member failed at least one bolded criteria and the Drill Proficiency Review Sheet indicated they were graded as proficient with a review session required. Seven additional instances were identified where an ERG member failed at least one bolded criteria but the Drill Proficiency Review Sheet indicated they were graded as non-proficient with a review session required. The basis for the inconsistency in the overall conclusion was not evident. Further, in some instances what appeared to be significant proficiency issues (e.g., inadequate event-scene location, lack of effective boundaries, movement of personnel leading to cross- contamination) were documented yet no instances were identified where a re-drill was required. In one instead an ERG member was graded as proficient even though the drill was terminated before the ERG member was able to demonstration the key functions of the position. The evaluator documented successful proficiency based on prior drill participation observation and discussion of actions to be completed with the ERG member following the drill. A review of training documents and course materials identified minor inconsistencies that should be addressed during the next scheduled update. TFC-PLN- 130, WRPS Emergency Management Drill and Training Program, identifies the FERG positions and associated training requirements for Tank Farm/242-A Evaporator and 222-S Laboratory. Although the Facility Staging Area Manager is identified as a required position for 222-S, training requirements for this position are not included in the document. Also, during the review of WRPS training courses, several instances were noted where the course materials made reference to Incident Commander duties being shared between HSD and HP during security events. RLEP 1. 1, Hanford Incident Command System and Event Recognition and Classification, assigns Incident Commander duties to the senior responding HFD officer with the senior Hanford Patrol Officer directing security related response actions. These observations are not necessarily indicative of a weakness in program implementation but should be addressed during the next scheduled revisions to the documents.

6/14/2018	WRPS-PER-2018-1529	WRPS should revise EAL web-based refresher training to ensure course content reinforces decision-making capabilities	The U.S. Department of Energy (DOE), Richland Operations Office (RL) Emergency Services Information Management Division and DOE Office of River Protection conducted an assessment of the Washington River Protection Solutions LLC Emergency Preparedness Program at the Hanford Site January 24, 2018, through February 15. 2018. The assessment was conducted to meet the requirements of DOE 0 15 1. 1 C, Comprehensive Emergency Management System, and its implementation document at Hanford, DOE/RL-94-02, Hanford Emergency Management Plan. The RL EP Program Manager was the assessment team lead and was assisted by Mission Support Alliance, LLC EP subject matter experts. Field work activities for the assessment included staff interviews, facility walk-downs, observations at two drills and a review of relevant documentation. Two findings, four suggestions, and three strengths were identified for Washington River Protection Solutions LLC. ---------- SUGGESTION S-04 WRPS should revise EAL web-based refresher training to ensure course content reinforces decision-making capabilities. BACKGROUND Course #3 5F005, WRPS EAL Refresher Training, is provided as computer-based training and only includes scenarios as part of the end-of-course knowledge check with no content to refer the student to for assistance when answered incorrectly. As a result, there is no assurance the student recalls the basis for the EALs. Further, this set up enables the student to click through the possible answers until successful. BEDs are required to validate their proficiency during an annual drill using scenarios based on facility EALs. A review of training records and drill/proficiency documentation confirmed training and proficiency were completed annually as required. The evaluation team observed a Tank Farms ICP Limited drill on January 24, 2018, involving an explosive device scenario. During the drill, the BED appeared to struggle with whether the description constituted a confirmed explosive device, consistent with the EAL criteria. However, the BED ultimately classified the event correctly. The post-drill report was inadequate in that the narrative provided did not support the determination that the classification objective had been successfully met. WRPS subsequently reissued the drill report to provide a more detailed summary of response that supported the evaluation of the classification objective.
6/14/2018	WRPS-PER-2018-1531	Untrained worker in RBA	On 6/14/18 an American Electric (b)(6) entered the Radiological Buffer Area (RBA) in the 217AX Tent without an escort or Radiological Worker I Training.
6/14/2018	WRPS-PER-2018-1533	2750E Walk Down	On June 13, 2018, I did a walk through of 2750E. The main focus of the walk through was to look at "completed" projects within the building to see in any work remained. Two main areas have had projects completed within the past 6 months: elevator replacement was completed in December and the remodel of conference room B-103. The conference room was locked and no key custodians were available, so this area will be reviewed later this month. Regarding the area around the elevator in the SW corner of 2750E the following items were identified:1. The molding around the floor was never installed2. The framing of the elevator entry on the 1st floor was primed, but never painted.3. The sign warning personnel to not use the elevator in case of fire is attached to the wall using duct tapeThe elevator was deemed operational 12/12/17 and no work has occurred in this area since that time.

6/14/2018	WRPS-PER-2018-1534	Stop work on the issuance of respiratory equipment from MO-568 (Construction Satellite Issue Station)	A review of respiratory issuance logs from the MO-568 (Construction Satellite Issue Station) identified an individual was issued SCBA equipment on several occasions without being qualified to wear an SCBA. The individual was issued the equipment from different respiratory issuers and not from a single individual which indicates a broader issue.
6/14/2018	WRPS-PER-2018-1539	Incorrect "Document Number" Type in RPP-27195	Per procedure TFC-ENG-DESIGN-C-25, Table 1, under Software Quality Assurance Documents, Software Test Plan and Cases should receive an RPP-PLAN-XXXXX number. RPP-27195, Section 2.12 incorrectly lists Software Test Plan and Cases as receiving an RPP-RPT-XXXXX number. As a side note, SPF correctly issues an RPP-PLAN-XXXXX number.
6/14/2018	WRPS-PER-2018-1540	A Contractor's vehicle made partial entry into the 241-AW Tank Farm without the required notifications and inspections.	A vehicle delivering gravel to 241-AW partially entered the farm without a prior vehicle inspection and without proper notifications to Central Shift and/or the farm Dayshift Manager. Access inspections and entry notifications are specified in TFC-OPS-OPER-C-10; Vehicle and Dome Load Control in Tank Farm Facilities.

6/14/2018	WRPS-PER-2018-1536	Area Precautionary Take Cover was not initiated during drill	EP-PE 12 Protective Actions On May 3rd 2018, Emergency Preparedness conducted an ICP Limited Drill that included 222-S Complex ERO personnel and a simulated explosion at the 222-S Complex (EM-222S-ICP-2018-05-01). During the course of the drill the evaluation team identified the following suggestion: The BED conducted a 222-S Complex Take Cover however he did not initiate a Precautionary Take Cover for the 200 West Area when it was understood the dangerous and mixed waste storage area had exploded
6/14/2018	WRPS-PER-2018-1535	Drill EAL recognition not prioritized	EP-PE 6 - Emergency Response Organization On May 3rd 2018, Emergency Preparedness conducted an ICP Limited Drill that included 222-S Complex ERO personnel and a simulated explosion at the 222-S Complex (EM-222S-ICP-2018-05-01). During the course of the drill the evaluation team identified the following suggestion: The BED did not prioritize or communicate the importance of identifying building damage for confirmation of the EAL for the HMOE declaration to the IC and arriving HFD Responders.
6/14/2018	WRPS-PER-2018-1537	ERO Response Binder Maintenance and Control	EP-PE 2 Program Administration On May 3rd 2018, Emergency Preparedness conducted an ICP Limited Drill that included 222-S Complex ERO personnel and a simulated explosion at the 222-S Complex (EM-222S-ICP-2018-05-01). During the course of the drill the evaluation team identified the following suggestion: The 222-S complex maintains several ERO response binders in and outside of the established ICP locations. The ERO binders contain OUO controlled documents. Some documents are copied from MSA controlled documents that display the controlled copy designation number. The ERO binders are necessary for ERO members to quickly access the required RLEP checklists and ERPs to be able to properly respond to a time urgent emergency situation. MSA document control does not provide guidance to allow uncontrolled copies to be distributed nor do they provide us with the near 100 controlled copies that would be required to be able to properly maintain the ERO binders that WRPS maintains.

6/14/2018	WRPS-PER-2018-1538	Drill DOE Fac Rep Prompt Notification	**EP-PE 10 – Notification and Communication** **On May 3rd 2018, Emergency Preparedness conducted an ICP Limited Drill that included 222-S Complex ERO personnel and a simulated explosion at the 222-S Complex (EM-222S-ICP-2018-05-01). During the course of the drill the evaluation team identified the following suggestion:** The DOE Fac Rep was notified of the event during the initial ICP activation however an update notification to the DOE Fac Rep after the EAL Declaration was performed was not completed in the prompt 15 minutes.
6/16/2018	WRPS-PER-2018-1546	AX 104 riser 16 cracked concrete pad	AMEC FWS and AMEC Safety reported at 0925 while performing excavation activities around Riser 16 on AX-104 a portion of a concrete pad with a preexisting crack slowly sluffed off into the adjacent trench at a depth of three feet. An AMEC (b)(6) was on top of the pad placing a shade tent into position, but remained solidly footed on the portion of the pad that remained in place and was unaffected. No individuals were in the vicinity in the trench.
6/17/2018	WRPS-PER-2018-1547	Chilled Water System 28-1 Safety Shutdown	CRO received alarm thru MCS stating "Water Chiller B alarm".

6/17/2018	WRPS-PER-2018-1548	242-A Pump Storage Room and Airlock AOP-015 Entry	At approximately 2138 hours on 6/15/18, 2 workers were in the 242-A Pump Storage Room and associated Airlock with one detecting an ammonia type odor which caused them to feel light headed. The second individual did not smell the odor and experienced no symptoms.
6/18/2018	WRPS-PER-2018-1549	Contaminated Bird Feces at ETF	During the performance of a Scheduled Radiation Survey Task Description (LE-D012) at ETF, contaminated bird feces was discovered. Total Contamination of; Surge Beren (Radiological Buffer Area): Location # 1: 14,980 dpm/100 cm2 Beta-Gamma and 7 dpm/100 cm2 Alpha, No removable contamination was detected. The location was deconned. Survey results are documented in Survey Simple on survey # LE-1801185
6/18/2018	WRPS-PER-2018-1550	PER Roll Up Process - Deleted Trend Codes	The PER Roll Up Process removes the Con Ops Trending Codes from the PER being rolled up into a Host PER. That Host PER may at times not have the same Con Ops Trending Code. This process compromises the ability to trend for leading indicators if our trend codes are removed and not rolled up too the Host PER,. When the Con Ops codes are removed this causes the Con OPs groups data to become distorted. The procedure does not address the removal of the trending codes in TFC-ESHQ-Q_C-C-01 section 4.15. Attached is an example of a Roll Up: Rollup 01 is an estars attached list of rolled up PERS. Rollup 2 is a PER (Top) from that list. Rollup 3 is the bottom of Rollup 2 PER- it shows the deleted ConOps Codes from that PER.

6/18/2018	WRPS-PER-2018-1463	Combination of organizational structure and lack of field presence has stifled effective communications	A management directed assessment of the 222-S Laboratory's Conduct of Operations performance was conducted May 14 to May 21, 2018, as delineated in assessment plan FY 2018 OPI MD 0380, 222 S Laboratory Conduct of Operations Performance Review. The following is a Finding from the assessment: Combination of organizational structure and lack of field presence has stifled effective communications, disrupted clear lines of authority and accountability, and prevents empowerment of the Facility Operations Manager.
6/18/2018	WRPS-PER-2018-1464	staffing levels for facility operations is not currently sufficient without routine use of overtime.	A management directed assessment of the 222-S Laboratory's Conduct of Operations performance was conducted May 14 to May 21, 2018, as delineated in assessment plan FY 2018 OPI MD 0380, 222 S Laboratory Conduct of Operations Performance Review. The following is an Observation from the assessment: Although a plan is being worked, qualified and proficient Stationary Operating Engineer staffing levels for facility operations is not currently sufficient without routine use of overtime.
6/18/2018	WRPS-PER-2018-1465	The Facility Operations Manager would benefit from an expeditor to assist with work week authority duties related to work pac	A management directed assessment of the 222-S Laboratory's Conduct of Operations performance was conducted May 14 to May 21, 2018, as delineated in assessment plan FY 2018 OPI MD 0380, 222 S Laboratory Conduct of Operations Performance Review. The following is an Observation from the assessment: The Facility Operations Manager would benefit from an expeditor to assist with work week authority duties related to work package readiness.

6/18/2018	WRPS-PER-2018-1466	Evaluate resource loading and scheduling practices (craft specifically) for efficiency and consistency.	A management directed assessment of the 222-S Laboratory's Conduct of Operations performance was conducted May 14 to May 21, 2018, as delineated in assessment plan FY 2018 OPI MD 0380, 222 S Laboratory Conduct of Operations Performance Review. The following is an Observation from the assessment: Evaluate resource loading and scheduling practices (craft specifically) for efficiency and consistency.
6/18/2018	WRPS-PER-2018-1467	Evaluate if additional supervision is warranted on backshift at the 222 S Laboratory taking into consideration interface with	A management directed assessment of the 222-S Laboratory's Conduct of Operations performance was conducted May 14 to May 21, 2018, as delineated in assessment plan FY 2018 OPI MD 0380, 222 S Laboratory Conduct of Operations Performance Review. The following is an Observation from the assessment: Evaluate if additional supervision is warranted on backshift at the 222 S Laboratory taking into consideration interface with the Central Shift Office.
6/18/2018	WRPS-PER-2018-1468	Evaluate adding the position and staffing for an Operations Specialist.	A management directed assessment of the 222-S Laboratory's Conduct of Operations performance was conducted May 14 to May 21, 2018, as delineated in assessment plan FY 2018 OPI MD 0380, 222 S Laboratory Conduct of Operations Performance Review. The following is an Observation from the assessment: Evaluate adding the position and staffing for an Operations Specialist. This position will provide for succession planning and relieve the Operations Manager and Facility Operations Managers from excessive amounts of administrative and technical responsibilities.

6/18/2018	WRPS-PER-2018-1469	Recommend conducting a weekly operations staff meeting with the Facility Operations Managers.	A management directed assessment of the 222-S Laboratory's Conduct of Operations performance was conducted May 14 to May 21, 2018, as delineated in assessment plan FY 2018 OPI MD 0380, 222 S Laboratory Conduct of Operations Performance Review. The following is an Observation from the assessment: Recommend conducting a weekly operations staff meeting with the Facility Operations Managers.
6/18/2018	WRPS-PER-2018-1470	Evaluate the number of meetings scheduled daily for necessity, value added, required attendance, consolidation or elimination	A management directed assessment of the 222-S Laboratory's Conduct of Operations performance was conducted May 14 to May 21, 2018, as delineated in assessment plan FY 2018 OPI MD 0380, 222 S Laboratory Conduct of Operations Performance Review. The following is an Observation from the assessment: Evaluate the number of meetings scheduled daily for necessity, value added, required attendance, consolidation or elimination.
6/18/2018	WRPS-PER-2018-1471	The AHU-4 temperature reading, DA-T (40-90 degrees), was found out of specification at 100 degrees. No red circle, notificat	A management directed assessment of the 222-S Laboratory's Conduct of Operations performance was conducted May 14 to May 21, 2018, as delineated in assessment plan FY 2018 OPI MD 0380, 222 S Laboratory Conduct of Operations Performance Review. The following is an Finding from the assessment: The AHU-4 temperature reading, DA-T (40-90 degrees), was found out of specification at 100 degrees. No red circle, notification to FOM, logbook entry, or comment on round sheet was noted as required per Section 11.12 of ATS-310.

6/18/2018	WRPS-PER-2018-1472	Reduction of aging PER evaluations and corrective actions assigned to 222-S Facility Operations is an opportunity for improve	A management directed assessment of the 222-S Laboratory's Conduct of Operations performance was conducted May 14 to May 21, 2018, as delineated in assessment plan FY 2018 OPI MD 0380, 222 S Laboratory Conduct of Operations Performance Review. The following is an Observation from the assessment: Reduction of aging PER evaluations and corrective actions assigned to 222-S Facility Operations is an opportunity for improvement.
6/18/2018	WRPS-PER-2018-1473	Opportunity to correct HPI errors with performance of SOE surveillances by ensuring reading are recorded when read and consid	A management directed assessment of the 222-S Laboratory's Conduct of Operations performance was conducted May 14 to May 21, 2018, as delineated in assessment plan FY 2018 OPI MD 0380, 222 S Laboratory Conduct of Operations Performance Review. The following is an Observation from the assessment: Opportunity to correct HPI errors with performance of SOE surveillances by ensuring reading are recorded when read and consider the following recommendations to the data sheets. o More space is available to expand the boxes to record data - the boxes are cramped. o Increase the font size of the readings. o All the readings for the same component should be on the same page. o The rounds should lead the data collector on a prescribed tour route for efficiency. o Move written instructions to separate administrative procedure so surveillance is just the data sheets.
6/18/2018	WRPS-PER-2018-1474	No Rounds Action Tracking List exists for the 222-S Rounds.	A management directed assessment of the 222-S Laboratory's Conduct of Operations performance was conducted May 14 to May 21, 2018, as delineated in assessment plan FY 2018 OPI MD 0380, 222 S Laboratory Conduct of Operations Performance Review. The following is an Observation from the assessment: No Rounds Action Tracking List exists for the 222-S Rounds.

6/18/2018	WRPS-PER-2018-1475	Chem Tech "rounds" performed per Section 11.12, Shift Turnover and Minimum Staffing Guidelines for 222-S, of ATS-310, to reco	A management directed assessment of the 222-S Laboratory's Conduct of Operations performance was conducted May 14 to May 21, 2018, as delineated in assessment plan FY 2018 OPI MD 0380, 222 S Laboratory Conduct of Operations Performance Review. The following is an Observation from the assessment: Chem Tech "rounds" performed per Section 11.12, Shift Turnover and Minimum Staffing Guidelines for 222-S, of ATS-310, to record facility tank levels per Appendix D, should be treated as formal surveillances.
6/18/2018	WRPS-PER-2018-1476	Section 2.31, Temporary Data Collection, of ATS-310 is the controlling procedure for temporary rounds but contains no time li	A management directed assessment of the 222-S Laboratory's Conduct of Operations performance was conducted May 14 to May 21, 2018, as delineated in assessment plan FY 2018 OPI MD 0380, 222 S Laboratory Conduct of Operations Performance Review. The following is an Observation from the assessment: Section 2.31, Temporary Data Collection, of ATS-310 is the controlling procedure for temporary rounds but contains no time limit to define temporary. Each individual data sheet has a start and end date but no guidance on what the limits are to "temporary." The current temporary round on fire system inspection has been in place since 2015, which does not appear temporary in nature.
6/18/2018	WRPS-PER-2018-1477	Section 2.31, Temporary Data Collection, of ATS-310 should be considered for addition as an implementin g procedure under Shif	A management directed assessment of the 222-S Laboratory's Conduct of Operations performance was conducted May 14 to May 21, 2018, as delineated in assessment plan FY 2018 OPI MD 0380, 222 S Laboratory Conduct of Operations Performance Review. The following is an Observation from the assessment: Section 2.31, Temporary Data Collection, of ATS-310 should be considered for addition as an implementing procedure under Shift Routines and Operating Practices in the Conduct of Operations Matrix found in Attachment A of TFC PLN 05, Conduct of Operations Implementation Plan.

6/18/2018	WRPS-PER-2018-1478	There is one area within the 222-S Laboratory where radios are restricted. However, this area is also an area where communic	A management directed assessment of the 222-S Laboratory's Conduct of Operations performance was conducted May 14 to May 21, 2018, as delineated in assessment plan FY 2018 OPI MD 0380, 222 S Laboratory Conduct of Operations Performance Review. The following is an Observation from the assessment: There is one area within the 222-S Laboratory where radios are restricted. However, this area is also an area where communications are sometime required as part of Stationary Operating Engineer operations. An equipment fix should be instituted to correct this.
6/18/2018	WRPS-PER-2018-1479	Use of Public Address Exchange (PAX) to determine the location of personnel is overused and distracting to the flow of inform	A management directed assessment of the 222-S Laboratory's Conduct of Operations performance was conducted May 14 to May 21, 2018, as delineated in assessment plan FY 2018 OPI MD 0380, 222 S Laboratory Conduct of Operations Performance Review. The following is an Observation from the assessment: Use of Public Address Exchange (PAX) to determine the location of personnel is overused and distracting to the flow of information in the facility and outlying administrative buildings. Numerous PAX announcements for personnel location were noted by the team.
6/18/2018	WRPS-PER-2018-1480	The "Operational Excellence Tip" distributed on May 15, 2018, was good information. However, upon follow up, it is not prese	A management directed assessment of the 222-S Laboratory's Conduct of Operations performance was conducted May 14 to May 21, 2018, as delineated in assessment plan FY 2018 OPI MD 0380, 222 S Laboratory Conduct of Operations Performance Review. The following is an Observation from the assessment: The "Operational Excellence Tip" distributed on May 15, 2018, was good information. However, upon follow up, it is not presented to employees through existing processes. Include Public Address Exchange (PAX) usage in the facility orientation's computer based training

6/18/2018	WRPS-PER-2018-1481	The 222-S Laboratory's operating and administrative procedure(s) do not provide roles, responsibilities, accountabilities, or	A management directed assessment of the 222-S Laboratory's Conduct of Operations performance was conducted May 14 to May 21, 2018, as delineated in assessment plan FY 2018 OPI MD 0380, 222 S Laboratory Conduct of Operations Performance Review. The following is an Finding from the assessment: The 222-S Laboratory's operating and administrative procedure(s) do not provide roles, responsibilities, accountabilities, or authorities for the FTPC position. Decisions are being made by the FTPC regarding facility configuration control that are not identified in, or driven by, approved procedure(s).
6/18/2018	WRPS-PER-2018-1482	On-Call Facility Technical Point of Contact qualification card 172141, Rev 2, (dated July 11, 2012) does not require the nece	A management directed assessment of the 222-S Laboratory's Conduct of Operations performance was conducted May 14 to May 21, 2018, as delineated in assessment plan FY 2018 OPI MD 0380, 222 S Laboratory Conduct of Operations Performance Review. The following is an Finding from the assessment: The 222-S Laboratory's On-Call Facility Technical Point of Contact qualification card 172141, Rev 2, (dated July 11, 2012) does not require the necessary skills, education, experience and qualification to make facility operational decisions on backshift.
6/18/2018	WRPS-PER-2018-1483	The quarterly surveillance that is required by TFC OPS OPER C 39, Caution Tags, is not currently being performed and document	A management directed assessment of the 222-S Laboratory's Conduct of Operations performance was conducted May 14 to May 21, 2018, as delineated in assessment plan FY 2018 OPI MD 0380, 222 S Laboratory Conduct of Operations Performance Review. The following is an Finding from the assessment: The quarterly surveillance that is required by TFC OPS OPER C 39, Caution Tags, is not currently being performed and documented on Hanford Site form A-6003-108, Caution Tag Installation/Removal.

6/18/2018	WRPS-PER-2018-1484	Facility Operations and Maintenance/Work Control management should institutionalize a review process, including frequency and	A management directed assessment of the 222-S Laboratory's Conduct of Operations performance was conducted May 14 to May 21, 2018, as delineated in assessment plan FY 2018 OPI MD 0380, 222 S Laboratory Conduct of Operations Performance Review. The following is an Observation from the assessment: The facility has 300+ work requests in the maintenance queue, some of which date back greater than 15 years. Based on interviews conducted with facility operations and maintenance/work control personnel, these requests haven't reached a prioritization level to be planned and worked, therefore, creating a large number of items in the queue. There is no mechanism/process currently in place for frequent review of the items in order to determine work prioritization or cancellation, as applicable. Facility Operations and Maintenance/Work Control management should institutionalize a review process, including frequency and prioritization, to determine whether these and future requests are necessary to be worked or cancelled. This process will more effectively manage the maintenance queue and reduce the overall numbers of items.
6/18/2018	WRPS-PER-2018-1485	FY2018-OPI-MD-0380, 222-S Laboratory Conduct of Operations Performance Review	A management directed assessment of the 222-S Laboratory's Conduct of Operations performance was conducted May 14 to May 21, 2018, as delineated in assessment plan FY 2018 OPI MD 0380, 222 S Laboratory Conduct of Operations Performance Review. The following is an Observation from the assessment: It was noted that Work Order 363054, 222-S MCC-1 & Exhaust Fan Upgrade, although the LOTO was not installed, was given a full release to work. However, there were steps in the work order to ensure the LOTO was accomplished prior to proceeding. Though this approach was compliant, it may not be the most conservative approach for such a complex activity with several iterations of LOTO required based on work sequencing.
6/18/2018	WRPS-PER-2018-1487	FY2018-OPI-MD-0380, 222-S Laboratory Conduct of Operations Performance Review	A management directed assessment of the 222-S Laboratory's Conduct of Operations performance was conducted May 14 to May 21, 2018, as delineated in assessment plan FY 2018 OPI MD 0380, 222 S Laboratory Conduct of Operations Performance Review. The following is an Observation from the assessment: Missed opportunity to utilize the JRG process for package planning of complex activities in support of 222-S Laboratory's outage activities.

6/18/2018	WRPS-PER-2018-1488	The requirements for escorting vendors and visitors should be reviewed to ensure the implementing procedure reflects the faci	A management directed assessment of the 222-S Laboratory's Conduct of Operations performance was conducted May 14 to May 21, 2018, as delineated in assessment plan FY 2018 OPI MD 0380, 222 S Laboratory Conduct of Operations Performance Review. The following is an Observation from the assessment: The requirements for escorting vendors and visitors should be reviewed to ensure the implementing procedure reflects the facility expectations and is clearly understood by the work force.
6/18/2018	WRPS-PER-2018-1507	Revise the Workflow Review & Approval Process for procedures (WRAP) to ensure that the "users" (e.g., Chemical Technicians/S	A management directed assessment of the 222-S Laboratory's Conduct of Operations performance was conducted May 14 to May 21, 2018, as delineated in assessment plan FY 2018 OPI MD 0380, 222 S Laboratory Conduct of Operations Performance Review. The following is an Observation from the assessment: Revise the Workflow Review & Approval Process for procedures (WRAP) to ensure that the "users" (e.g., Chemical Technicians/Stationary Operating Engineers) fully participate in technical procedure review and approval process.
6/18/2018	WRPS-PER-2018-1551	April Production Operations Radiological Control Radiological Survey Report (RSR) Review	1. During the performance of the April Production Operations Radiological Control Radiological Survey Report (RSR) Review, discrepancies were identified with 7 Radiological Survey Reports. 2. Discrepancies were communicated to respective RCFLMs for correction

6/18/2018	WRPS-PER-2018-1552	EAPC Safety Book - Upper Parking Lot	2750 Upper parking lot sidewalk broken and lifted up and broken off the sidewalk. People could trip.
6/18/2018	WRPS-PER-2018-1508	The Operator Aid located in Room 5F that is held on the wall by a magnet. Section 11.17 of ATS-310, requires operator aids b	A management directed assessment of the 222-S Laboratory's Conduct of Operations performance was conducted May 14 to May 21, 2018, as delineated in assessment plan FY 2018 OPI MD 0380, 222 S Laboratory Conduct of Operations Performance Review. The following is an Finding from the assessment: The Operator Aid located in Room 5F that is held on the wall by a magnet. Section 11.17 of ATS-310, requires operator aids be "securely mounted or stowed."
6/18/2018	WRPS-PER-2018-1509	The elevator hydraulic panels work steps put on the panel with marker. This must be removed and replaced with a procedurally	A management directed assessment of the 222-S Laboratory's Conduct of Operations performance was conducted May 14 to May 21, 2018, as delineated in assessment plan FY 2018 OPI MD 0380, 222 S Laboratory Conduct of Operations Performance Review. The following is an Finding from the assessment: The elevator hydraulic panels work steps put on the panel with marker. This must be removed and replaced with a procedurally compliant aid(s) if necessary

6/18/2018	WRPS-PER-2018-1510	To alleviate any confusion, establish one location for index of Operator Aids.	A management directed assessment of the 222-S Laboratory's Conduct of Operations performance was conducted May 14 to May 21, 2018, as delineated in assessment plan FY 2018 OPI MD 0380, 222 S Laboratory Conduct of Operations Performance Review. The following is an Observation from the assessment: To alleviate any confusion, establish one location for index of Operator Aids.
6/18/2018	WRPS-PER-2018-1511	The definition of what an Operator Aid is in Section 11.17 of ATS-310 should be clarified to align with DOE guidance and TFC-	A management directed assessment of the 222-S Laboratory's Conduct of Operations performance was conducted May 14 to May 21, 2018, as delineated in assessment plan FY 2018 OPI MD 0380, 222 S Laboratory Conduct of Operations Performance Review. The following is an Observation from the assessment: The definition of what an Operator Aid is in Section 11.17 of ATS-310 should be clarified to align with DOE guidance and TFC-OPS-OPER-C-41. Reevaluate the existing postings as necessary after new guidance is established.
6/18/2018	WRPS-PER-2018-1554	IA18-03 Records Management Finding #1--Controls are not designed adequately to ensure retention of jury service records.	Controls are not designed adequately to ensure retention of jury service records. Condition: • 1 of 5 (20%) judgmentally selected official proof of jury service records were not retained by HR as required per procedure. Internal audit was able to obtain the record from the employees' manager. • Repeat finding from IA15-14, "Labor Charging – Attendance Codes", finding #4 - Required documentation was not retained in all instances to support the use of jury time and periodic reviews of the use of jury time did not occur to ensure abnormalities could be detected in a timely manner. Management response said, "Will establish a desk procedure and revise pertinent procedures to ensure that Jury Duty supporting documentation is kept on file in HR. Will communicate to employees/managers of change to processes. End of calendar year 2015." Internal Audit reports are OUO. Please contact the PER Originator for more information.

6/18/2018	WRPS-PER-2018-1555	IA18-03 Records Management Finding # 2 Controls not adequate to retain military service records	Controls are not designed adequately to ensure retention of military service records. Condition: • 2 of 2 (100%) military orders judgmentally sampled were not retained by the WRPS Benefits Coordinator in Human Resources (HR). Internal audit was able to obtain the two records from Mission Support Alliance (MSA) Payroll. MSA currently retains these in the MSA controlled portion of the Integrated Document Management System. • By end of calendar year 2015, management committed to revising pertinent procedures to ensure military duty supporting documentation is kept on file at WRPS in HR in additional to MSA Payroll. • Repeat finding from IA15-14, "Labor Charging – Attendance Codes", finding #5 - Documentation was not retained for employees who were required to report for military duty. Management response said, "Will establish a desk procedure and revise pertinent procedures to ensure that Military Duty supporting documentation is kept on file in HR in addition to being forwarded to payroll. Will communicate to employees/managers of change to processes. End of calendar year 2015." Internal Audit reports are OUO. Please contact the PER Originator for more information.
6/18/2018	WRPS-PER-2018-1556	IA18-03 Records Management Finding #3	Reviews of procedures are ineffective to identify all records. Condition: • 3 of 11 (27%) judgmentally selected procedures did not identify all necessary records for the following record types: o Subcontractor invoices and supporting documentation,TFC-BSM-CP_CPR-C-05, "Procurement of Services", these are however currently in the WRPS portion of IDMS o Military orders in Human Resources,TFC-BSM-HR_AT-C-03, "Personal Time Bank and Other Absences", these are currently in the MSA portion of IDMS o Corrective action plans in Internal Audit,TFC-BSM-IS-C-03, "Responding to an Audit", these are not currently stored in IDMS Internal Audit reports are OUO. Please contact the PER Originator for more information.
6/18/2018	WRPS-PER-2018-1557	IA18-03 Records Management Finding #4	Controls are not adequately designed to ensure all records are properly submitted for storage. Condition: • There are no controls designed to ensure all records are properly stored. For example, • An individual was keeping records in their work location without submitting them to IDMS, a RHA, or RSA, there are no controls to prevent or detect missing records. • Eight standard (non-fireproof) file cabinets were being used for storage in 851 SmartPark of original contract records that cannot be recreated. There are currently no controls designed to detect whether records are properly stored in fireproof safes. • As part of the audit, a survey was sent to all WRPS managers, with 191 responding. 14 of 191 (7%) surveyed managers stated they do not have the appropriate amount of knowledge as to what constitutes a record. Internal Audit reports are OUO. Please contact the PER Originator for more information.

6/18/2018	WRPS-PER-2018-1558	IA18-03 Records Management Finding #5	Monitoring controls are not in place to ensure that procedural requirements are followed for records in a Record Holding Area (RSA) and Integrated Document Management System (IDMS). Condition: • 11 of 11 (100%) Judgmentally selected RHA boxed were found in the locations stated in the Records Management Access Portal (RMAP) • Records that WRPS is responsible for maintaining are stored through MSA. If MSA lost WRPS records, there is a risk WRPS could be negatively impacted. There are currently no controls designed to detect whether MSA is performing adequate record management. Internal Audit reports are OUO. Please contact the PER Originator for more information.
6/18/2018	WRPS-PER-2018-1559	IA18-03 Records Management Finding #6	Preventive controls are not in place to ensure that Integrated Document Management System (IDMS) Administrators are obtaining authorization prior to destroying records. Condition: • 1 of 10 (10%) judgmentally selected records deleted in FY17 by IDMS Administrators did not have authorization prior to being deleted. Only IDMS Administrators have the ability to delete records from IDMS and all administrators are Mission Support Alliance (MSA) employees. • There are currently no monitoring controls designed to detect if MSA deleted records without authorization. Internal Audit reports are OUO. Please contact the PER Originator for more information.
6/18/2018	WRPS-PER-2018-1553	Current Sample Inventory Management System is inadequate	During the Quarterly 222-S ALARA Committee meeting, discussions about the current sample inventory management system arose. Currently the 222-S sample inventory is being tracked in multiple control and tracking system databases in different locations within 222-S. The databases work independent of each other. While information can be obtained and added from one system to another, the databases cannot access the information directly from outside systems. The information must be gathered independently and manually input. The data in LABCORE, 2SAD, IDMS and OMNILIMS for the samples can result in data being only partially listed in each database and sometimes require hard copies of all to get a total picture of the entire sample flow. Conflicts can arise when data is input late and parent samples are mismatched with daughters. One database lists one flow while another lists a slightly different flow.

6/18/2018	WRPS-PER-2018-1560	IA18-03 Records Management Finding # 7	Detective controls were not adequately designed to ensure that records are uploaded by MSA after a submittal by WRPS. Condition: • Thousands of records that WRPS is responsible for maintaining are uploaded to IDMS by MSA each year. If MSA failed to upload WRPS records, there is a risk WRPS could be negatively impacted. WRPS currently has no controls designed to detect whether MSA is properly uploading records to IDMS. Internal Audit reports are OUO. Please contact the PER Originator for more information.
6/18/2018	WRPS-PER-2018-1561	IA18-03 Records Management Finding # 8	Controls are not adequately designed to ensure that Record Storage Areas only contain active records. Condition: • 1 of 5 (20%) judgmentally sampled RSAs contained records that were inactive due to being complete and stored for more than a year. • The inactive records were not included on the RSA index. Internal Audit reports are OUO. Please contact the PER Originator for more information.
6/18/2018	WRPS-PER-2018-1562	IA18-03 Records Management Finding #9	Records Management controls over procedure reviews are not operating effectively. Condition: • 9 of 14 (64%) judgmentally sampled technical procedures with major/minor changes from February 2018 were not reviewed by a Company Level Records Specialist due to not being assigned properly. • 5 of 5 (100%) judgmentally sampled new procedures/revision with major changes from February 2018 were not reviewed by a Company Level Records Specialist due to not being assigned properly. • There is no control monitoring of the procedure reconciliation process to ensure requirements are complete (refer to finding #3). Internal Audit reports are OUO. Please contact the PER Originator for more information.

6/18/2018	WRPS-PER-2018-1563	MBD Reset for TO-230-360 Rev. B-0	MBD allowable was reset to avoid transfer shut-down.
6/18/2018	WRPS-PER-2018-1564	MBD Reset (2nd) for TO-230-360 Rev. B-0	MBD allowable was reset to avoid transfer shut-down.
6/18/2018	WRPS-PER-2018-1565	MBD Reset (3rd) for TO-230-360 Rev. B-0	MBD allowable was reset to avoid transfer shut-down.

6/18/2018	WRPS-PER-2018-1566	MBD Reset (4th) for TO-230-360 Rev. B-0	MBD allowable was reset to avoid transfer shut-down.
6/18/2018	WRPS-PER-2018-1568	MBD Reset (5th) for TO-230-360 Rev. B-0	MBD allowable was reset to avoid transfer shut-down.
6/18/2018	WRPS-PER-2018-1569	241AP primary exhauster skid stairs	The 241AP primary exhauster skid stairs are NOT dimensionally uniform. Procedure TFC-ESHQ-FP-STD-02 attachment 1 requires stairs to be dimensionally uniform. Typically the top step and/or the bottom step are out of tolerance whether it's the adjacent riser variation or the smallest to largest riser variation. The stairs which access the upper levels appear to be compliant but have only been observed from ground level. All of the other stairs (6 sets) are non-compliant.

6/18/2018	WRPS-PER-2018-1567	Miss Issued RPE	On Friday morning (6/15/2018), at ~0700, an AEI (b)(6) was issued the incorrect mask from the 278AW mask issuing station. (b)(6) did not recognize he received the wrong mask until he left the mask station. Once he recognized the issue AEI management and safety were notified. The mask was taken back and exchanged for the correct one. The issuer owned up to the mistake and all parties involved acted professionally.
6/18/2018	WRPS-PER-2018-1570	Sewage being tracked into building	Because the pump for ETF sewage drain field is broken, we pump the tank daily. When finished, the worker pulls the hose out of the tank and it drips sewage all over the gravel. After the worker leaves, nobody knows it has occurred and they walk on the gravel. after walking through the gravel, the employees come into our lunchroom and put there feet on a chair. Also the barbeques are about 10 feet away from the spill location.
6/19/2018	WRPS-PER-2018-1573	Fluke 744 Failed Calibration	Fluke Documenting Process Calibrator, Model# 744, Serial# 1049004 (M&TE# 817-13-20-049) "As Found" reading during calibration was Out-Of-Tolerance. Could not be adjusted. Failed calibration.

6/19/2018	WRPS-PER-2018-1571	Contaminated Clothing Event	While (b)(6) in LERF Basin 42 to support basin cover replacement, (b)(6) slipped on the wet liner surface, and contacted the basin liner. Work was halted in the basin. Upon exit, it was noted that (b)(6) of (b)(6) were wet and contaminated with levels up to 100,000 dpm/ probe area beta gamma on the right knee area.. After doffing, it was noted that the right knee area of (b)(6) modesty clothing was contaminated with levels up to 10,000 dpm/100cm2 beta/gamma localized over the knee area. No alpha contamination was found. Modesty clothing was removed, follow up survey noted no additional contamination on (b)(6) skin under the contaminated area of the modesty clothing. No other contamination was identified during whole body survey or subsequent process through PCM after donning new clothing. General area removable contamination levels of 30,000 dpm/100cm2 beta/gamma (no alpha) in the basin were below RWP action levels.
6/19/2018	WRPS-PER-2018-1490	Data sent from WTP NLD system may not be accurate regarding discharges to TEDF	**The existing location of the WTP (Hanford Tank Waste Treatment and Immobilization Plant) NLD (Nonradioactive, Nondangerous Liquid Waste Disposal) discharge process flow monitoring instrumentation results in erroneous instrument readings at the ETF (Effluent Treatment Facility).** **See attached (NLD discharge instrumentation.jpg) for a simplified diagram of the NLD system.** Water is drawn from the WTP NLD Storage Tank (NLD-TK-00001) by NLD Discharge Pumps (NLD-PMP-00020A/B), the flow measured, and then returned to the NLD Storage Tank for recirculating and mixing, or pumped to the NLD Air Stripper Towers (NLD-VSL-00008A/B) for subsequent discharge to the Hanford TEDF **(Treated Effluent Disposal Facility) transfer lines via NLD Stripper Discharge Pumps (NLD-PMP-00043A/B).** **The measured NLD flow rate signal sent to ETF will not correctly indicate transfer flow to TEDF if any effluent is allowed to recirculate back to the NLD storage tank (i.e., YV-8009 is not closed), which is a possible WTP system configuration.** Additionally, since the NLD flow is not actually measured in the line connected to the TEDF transfer piping, the instantaneous effluent discharge flow rate value transmitted will not necessarily indicate the actual instantaneous discharge rate from WTP. This results in the inability to monitor instantaneous discharge flow **rate at the interface.** Also, pH and conductivity of the NLD process water is measured prior to completion of treatment and discharge to TEDF. This could cause NLD information sent from the WTP instruments (pH & conductivity) to be inaccurate, as the NLD Air Strippers (NLD-VSL-00008A & B) may have the potential to modify effluent **chemistry.** **WTP references: (WTP reference documents are not attached due to Bechtel non-disclosure agreement rules.)** **24590-BOF-M6-NLD-00002001; P&ID - BOF NON-RADIOACTIVE LIQUID WASTE DISPOSAL SYSTEM NLD-TK-00001** **24590-BOF-M6-NLD-00002002; P&ID - BOF NON-RADIOACTIVE LIQUID WASTE DISPOSAL SYSTEM NLD PUMPHOUSE** **24590-BOF-M6-NLD-00002003; P&ID - BOF NON-RADIOACTIVE LIQUID WASTE DISPOSAL SYSTEM NLD PUMP HOUSE** **24590-BOF-M6-NLD-00003001; P&ID - BOF NON-RADIOACTIVE LIQUID WASTE DISPOSAL SYSTEM NLD-VSL-00008A/B** **24590-BOF-J3-NLD-00004; LOGIC DIAGRAM - BOF NLD TO TEDF DATALINK** **24590-BOF-SFR-NLD-0012_NA; FLOW MEASUREMENT TO TEDF** **24590-WTP-FC-SU-17-0080; INTERIM - INTERFACE TO TEDF NOT IN ACCORDANCE WITH ICD-05** **24590-WTP-FC-SU-17-0080_NA; INTERIM - INTERFACE TO TEDF NOT IN ACCORDANCE WITH ICD-05** **24590-BOF-DCP-M-17-0002; Non-Radioactive Liquid Waste Disposal System NLD-B-01 Design Modification**
6/19/2018	WRPS-PER-2018-1577	Inlet vent blocked	while performing a walkthrough of MO-2244, (b)(6) is unable to start the ventilation if needed because the inlet vent can not be open. Upon investigation, there is a scaffold block the vent from opening. This is needed if we have an event where the decon trailer is used.

6/19/2018	WRPS-PER-2018-1578	Planning Could benefit From Process Engineering Work Order Review and Approval Checklist	In reviewing a question and issue identified by the 242-A ORP Facility Representative, it was discovered that there is engagement in the planning process with Process Engineering through TFC-OPS-MAINT-C-01 Attachment B "Review and Approval of Work Activities", but there is not a corresponding Work Order Review and Approval (WORA) checklist targeted at Process Engineering compliance. The current WORA process relies on the Responsible Engineer WORA checklist which is more targeted at non-waste transfer related compliance for review and approval. Normally waste transfers are conducted by a waste transfer Technical Procedure which captures all compliance controls including those relating to Process Engineering and waste compatibility. The work control process would be improved with an equivalent focus through a Process Engineer WORA checklist for those work activities executed by a work package that impact waste compatibility and associated controls.
6/19/2018	WRPS-PER-2018-1576	Emergency Event Descriptions	A recent General Purpose Facility evacuation drill was conducted utilizing the building fire alarm and a "bomb prop" to demonstrate the ability to safely evacuate the facility, complete accountability, and communicate unusual conditions or identify witnesses to potential cause of the event. During the drill occupants, as well as, the Building Wardens observed the "suspicious object" (bomb prop); however, the description of the object didn't convey that the item was a confirmed "bomb" prop which resulted in the Central Shift Manager to complete a limited notification up the chain of command.
6/19/2018	WRPS-PER-2018-1586	MBD Reset (6th) for TO-230-360 Rev. B-0	MBD allowable was reset to avoid transfer shut-down.

6/19/2018	WRPS-PER-2018-1591	F&J Flow Calibrator Out Of Tolerance	F&J Flow Calibrator, Model# CD-828V.2-1, Serial # 3608 (M&TE # 817-28-02-013) "As Found " reading during calibration was Out-Of-Tolerance. It was adjusted to manufacturer spec.
6/19/2018	WRPS-PER-2018-1419	OR Model Testing Specification Identification	RPP-PLAN-54122 specifies the hardware to be used in development, testing, and operation of models. The two published models reviewed (DFLAW Part B and LAWVIT) both lacked information on the hardware specifications of computers used during testing; the DFLAW PartB model did not contain information on the dates on which testing was completed.
6/19/2018	WRPS-PER-2018-1592	PTE-1 Pressure Calibrator Found Out-Of-Tolerance	Heise Pressure Calibrator, Model# PTE-1, Serial # 15303 (M&TE # 825-13-01-001) "As Found" reading during calibration was Out-Of-Tolerance. It was adjusted to manufacturer spec.

6/19/2018	WRPS-PER-2018-1593	Heise Pressure Module Found Out-Of-Tolerance	Heise Pressure Module, Model #HQS-1, Serial# HQS-61444 (M&TE # 825-80-02-009) "As Found" reading during calibration was Out-Of-Tolerance. It was adjusted to manufacturer spec.
6/19/2018	WRPS-PER-2018-1594	Heise Pressure Module found Out-Of-Tolerance	Heise Pressure Module, Model# HQS-1, Serial# HQS-61443 (M&TE # 825-80-02-010) "As Found" reading during calibration was Out-OF-Tolerance. It was adjusted to manufacturer spec.
6/19/2018	WRPS-PER-2018-1420	OR Model Unique Element Identification	Reviewed models appeared to be missing unique identification of Design Elements and incorporation of those elements into the Requirements Traceability Matrix of the model's software lifecycle documentation (procedurally derived from TFC-BSM-IRM_HS-C-03).

6/19/2018	WRPS-PER-2018-1368	Future Capture of PERs from MOPS and Actions or Assessments	PERs were not consistently submitted for recommendations and actions in past MOPs.
6/19/2018	WRPS-PER-2018-1369	Communication with Clients upon OR Model Development	While customers were generally aware of the OR model and have provided input, most did not know what input was used in the model and if it was correct, and they were not aware of specific outputs the OR model would provide.
6/19/2018	WRPS-PER-2018-1370	Rapid Deployment Desires for OR Models	The current OR model and V&V requirements can't keep up with the LAWPS/TSCR/WFD system/concept changes.

6/19/2018	WRPS-PER-2018-1421	HISI Entry Variability for OR Models	Although in compliance with procedures, the level of HISI detail varies from entry to entry, and there appears to be no standard for answering questions on the safety grading checklist or entering information in the various sections of each entry.
6/19/2018	WRPS-PER-2018-1422	HISI VDD Content Development and Completion for OR Models	Review of HISI entries #4130, #4216, and #4219 revealed that the Version Description Documentation (VDD) section of these entries has not yet been completed, or even started.
6/19/2018	WRPS-PER-2018-1423	Customer Definition and Engagement in OR Model Development	The lack of clear definition and engagement of the "Customer" and "Decision Makers" inhibits design and development of value-adding OR models.

6/19/2018	WRPS-PER-2018-1424	Develop High Level Strategy for OR Model Development and Application	No high-level plan or strategy is documented to establish long term objectives of OR modeling application for the TOC.
6/19/2018	WRPS-PER-2018-1425	Incorporation of KPI Assessment Tools into OR Model Development	Models under current development do not, ab initio, incorporate Key Performance Indicator assessment tools (dashboards).
6/19/2018	WRPS-PER-2018-1426	Develop Near Term OR Modeling Successes	Short-term or near-term OR modelling successes will be required for programmatic continuity of OR modeling to yield long-term benefits to the TOC.

6/19/2018	WRPS-PER-2018-1427	Establish formal basis and need for OR Model Design Documents	The purpose, creation, and revision of the Model Design Document should be more formally established and controlled.
6/19/2018	WRPS-PER-2018-1428	OR Model Layout Improvement for Non-Modelers	Current model layouts do not aid understanding by the non-modeller as they do not provide adequate facility or process representation while also confusing display with logic control variables which could be suppressed, placed in different layers, or turned off for presentation.
6/19/2018	WRPS-PER-2018-1429	Improve Tank Display in OR Models	Where tanks are displayed in the models, they show the tank contents graphically, but do not show a numeric value of the tank contents.

6/19/2018	WRPS-PER-2018-1430	Make OR model run time increments the same	Common run and batch time increments have not been established.
6/19/2018	WRPS-PER-2018-1431	Modularize OR Models	Application of modules is more extensive but remains subject to improvement.
6/19/2018	WRPS-PER-2018-1432	Streamline OR Model Data inputs through Named ranges	Incremental Recommendation for use of "named ranges" in Excel has been substantially met, but all models demonstrate incomplete application.

6/19/2018	WRPS-PER-2018-1433	OR Model Logic Documentation Improvement	Incremental recommendation for starting a Model Logic Document are not fully met with model notes and development of "Wiki" systems for element, function, and variable documentation.
6/19/2018	WRPS-PER-2018-1596	Excess water between Liquid Effluent Retention Facility (LERF) Basin #42 cover and the associated basin liner	During In-process As Low As Reasonably Achievable (ALARA) Review meeting (AR-18-37), the team noted there appears to be a lot more water under this cover compared to cover removal activities performed on Basin #43. They recalled following drain-down activities for Basin #43, that there was approximately two (2) weeks of time before cover removal began. This year during Basin #42 cover replacement, the cover removal activities began the very next day.
6/19/2018	WRPS-PER-2018-1597	Issuance of Respiratory Equipment	Upon review of training and mask issue station records it was identified that an individual had been issued a piece of equipment (SCBA) on multiple occasions without being qualified to use the equipment. The equipment was checked out at the 278AW mask issue station and issued by multiple issuers.

6/20/2018	WRPS-PER-2018-1580	Some radioactive sealed sources at the 222-S have not been included in the annual inventory	Several radioactive sealed sources at the 222-S laboratories are not controlled per procedure TFC-ESHQ-RP_MON-C-24, Sealed Radioactive Source Accountability and Control. This procedure requires that Exempt-level sealed sources be entered on form A-6007-435, Exempt Sealed Radioactive Source Index and undergo an annual inventory. Four sealed sources were stored with other sealed sources in Room B1-E but were not listed on the current Index Form and were not being inventoried. The observed sources include the following: • AEA Check Standard 65B53-1 • AEA Check Standard 65B53-B • AEA Check Standard 37B30-A • AEA Check Standard 37B30-B [Finding-001]
6/20/2018	WRPS-PER-2018-1581	Radioactive Sealed Source Manufacture Information Not Being Maintained As A Radiological Record	Record material regarding the birth/manufacture of some sealed radioactive sources was not available in IDMS. TFC-ESHQ-RP_MON-C-24, Sealed Radioactive Source Accountability and Control requires that this information be maintained as a radiological record. A review of the following sample of sealed source records was performed as shown below: It is very likely this condition exists for many more sources in the WRPS radioactive sealed source inventory. Source Number: D-237 92TH3100240 ICCS-1018 H2-029 96PUSP02861 93PU4702172 93-0522 GE-650 71-1-400 [Finding-002]
6/20/2018	WRPS-PER-2018-1582	Radiation Generating Device Custodian Not Current in Required Custodian Training	The assigned custodian for the 160 keV Mobile Core Sampling X-Ray Imaging System is not current in his RGD Custodian training (Course 351041). [Finding-003]

6/20/2018	WRPS-PER-2018-1583	Radiological Monitoring Not Performed For Two Radiation Generating Devices	Radiological monitoring has not been performed on the following radiation generating devices in accordance with standard TFC-ESHQ-RP-STD-04, Controlling Radiation Generating Devices. Bruker S1 Turbo-SD hand-held X-Ray Fluorescence (XRF) Device S/N: LE545 160 keV Mobile Core Sampling X-Ray Imaging System S/N: POR265 [Finding-004]
6/20/2018	WRPS-PER-2018-1584	Outdated Reference in the Radiological Control Manual	The DOE reference in Article 431.12 of the Radiological Control Manual is not current. The RCM references DOE N 234.1 for regarding reporting requirements for Category 1 and Category 2 radioactive sealed sources. This reference should be changed to DOE O 231.1B which superseded DOE N 234.1 in 2011. [Observation-001]
6/20/2018	WRPS-PER-2018-1585	Incorrect Form Used for Inventory of Exempt Category Radioactive Sealed Sources	The Production Operations ETF exempt sealed source index was published using the form for accountable sealed sources (Form A-6004-196). As described in procedure TFC-ESHQ-RP_MON-C-24, Sealed Radioactive Source Accountability and Control, the correct form to use is Form A-6007-435, Exempt Sealed Radioactive Source Index. [Observation-002]

6/20/2018	WRPS-PER-2018-1587	Minimal Discussion Regarding Radiation Generating Devices in the RPP (HNF-MP-5184)	The WRPS Radiation Protection Program, HNF-MP-5184, Rev 9 (RPP), provides only a very minimal discussion for the hazards associated with radiation generating device control in order to comply with 10 CFR 835.101(e). The RPP could be improved by providing a more detailed discussion. [Observation-003]
6/20/2018	WRPS-PER-2018-1588	Radioactive Material Labeling for Installed Rad Monitor	A permanently installed radiation monitor containing a sealed source at the Effluent Treatment Facility is not labeled as Radioactive Material. Although a label is not required by TFC-ESHQ-RP_MON-C-24, applying a radioactive material label to this item is a good practice and would make it consistent with every other one of these items in the WRPS program, both portable and installed. [Observation-004]
6/20/2018	WRPS-PER-2018-1589	No Procedure or Desk Instruction for Utilizing the DOE RSRT Database for Radioactive Sealed Source Reporting	WRPS should consider proceduralizing the process used for reporting information regarding accountable sealed sources to the DOE Radiological Source Registry and Tracking (RSRT) database. DOE's Radiological Source Registry and Tracking database is used for reporting information regarding accountable level radioactive sealed sources. There are no procedures or desk instructions issued for this process. The current process relies on email communications to specific individuals and historical knowledge. [Observation-005]

6/20/2018	WRPS-PER-2018-1590	No Apparent Driver for Requirement in Standard TFC-ESHQ-RP-STD-04, Controlling Radiation Generating Devices	Standard TFC-ESHQ-RP-STD-04, Controlling Radiation Generating Devices (RGD) requires that a DOE use permit be obtained when operating a DOE owned RGD. There appears to be no driver for this requirement. WRPS should investigate and remove the requirement from the standard if appropriate. [Observation-006]
6/20/2018	WRPS-PER-2018-1600	274AW Egress Issue	Egress along the corridor in the area of the kitchen measures 40 inches wide. The minimum required egress width is 44 inches. The wall on one side of this corridor is a moveable office partition about four feet high. It separates a small conference table and chairs from the corridor. The wall is not secured to the floor or other structural member and is easily moved into the required egress width.
6/20/2018	WRPS-PER-2018-1601	Liquid Effluent Retention Facility (LERF) basin cover removal additional water under cover	While performing LERF basin cover removal at Basin 42 under WO-384046, it was noted that more moisture and water was encountered when compared to previous Basin 43 cover replacement in 2017. It appears that this additional moisture is present due to less time lapse between basin pump/drain down and cover removal. This moisture has already caused worker slippage on the wet surface of the liner on 6/18/18, (see ALARA Review AR-18-37 and WRPS-PER-2018-1571). During the ALARA review it was suggested that future basin cover removal only be performed after enough time has lapsed post basin drain-down. There was at least two weeks between drain and cover removal in 2017. Cover removal was performed during this evolution within approximately one day of drain down.

6/20/2018	WRPS-PER-2018-1602	STOP work invoked at 2025E regarding installation of door hardware	MSA Locksmith invoked STOP WORK authority for repair work being conducted at 2025E to replace door hardware in multiple locations. Locksmith identified one door that had hardware installed such that personnel could be inadvertently locked inside an area, and one door that could be manipulated such that emergency egress would not be achieved. Locksmith believes that the Carpenter craft is not properly trained for the installation and testing of said hardware.
6/20/2018	WRPS-PER-2018-1603	Tank Farm Chemical Worker III Training concern	There were two items of concern noted during the class as follows: The term SWIMS was used in a few locations in the presentation. This should be changed to SWIM. The second S was defined as "secure." This is not in agreement with the current WRPS expectation for event response. The second concern (which I have no documentation to say if it is correct or incorrect) was a statement by the HPMC risk communications specialist which encouraged all workers to ensure they visit HPMC to "get their name on a list for future compensation." While this was not the only message given, the message should probably be more along the lines of going to HPMC so we can ensure the health of the employee and gain knowledge about TF vapors effects on the health of the workers. While he stated that message as well, the first portion of the message seemed to disagree with the overall message WRPS has been providing.
6/20/2018	WRPS-PER-2018-1604	Surveillance Analysis Computer System (SACS) Retirement	Manual entries are still being made into the SACS system and after July 31, 2018 entries can not be recorded into SACS the only method that readings can be retained into PI is through eRounds.

6/20/2018	WRPS-PER-2018-1605	Door Handle Locking Devices Incorrectly Installed	Door handle locking devices were installed in a manner that do not allow for egress from the room when the door handle is locked. The installation creates a hazard that the occupant in the room does not have a means to unlock the door or exit the room.
6/21/2018	WRPS-PER-2018-1606	Essential Drawing Still Shows Radiation Alarms in AW271 that were Removed Years Ago	Drawing H-14-020502 sht 7 still shows annulus leak detection CAM alarms on the instrument panels in AW271 that were removed many years ago. This is an essential drawing, so it is required to be kept up to date.
6/21/2018	WRPS-PER-2018-1494	Track a transition plan from the WHL small business contractor for the organic vapor analysis.	During the client review meeting for the 2018 Annual IH Management Directed Assessment the following concern/request was raised: Request and track a transition plan from the small business contractor (WHL) for the organic vapor analysis was requested by the IH client. The transition plan should include performance evaluation results, a meeting with the client to discuss transition requirements including sample comparison data and turnaround time agreements.

6/21/2018	WRPS-PER-2018-1610	Contaminated Bird Egg Shell	During the performance of a Scheduled Radiation Survey Task Description (LE-D012) at ETF, a contaminated bird egg shell was discovered. Total Contamination of; Surge Berm (Radiological Buffer Area): Location # 1: 22,650 dpm/100 cm2 Beta-Gamma and 42 dpm/100 cm2 Alpha, No removable contamination was detected. The location was deconned. Survey results are documented in Survey Simple on survey # LE-1801238.
6/21/2018	WRPS-PER-2018-1613	(b)(6) practices risked spread of contamination.	Title: Walkthrough and oversight of material release in AW farm Summary: On May 15, 2018 at about 2 pm, ORP RadCon oversaw (b)(6) from AW farm. The team was there performing an excavation where an area was up posted from RBA to CA. Since the power of the AW change trailer was down, (b)(6) up-posted a little area on the side of the change trailer by a walk-thru for gate from the farm, this also allowed more room to perform release surveys of the respiratory equipment. While AW trailer does not have a large area to facilitate release surveys, a covered area would help personnel exiting and (b)(6) assisting in the job to cool off from hot weather. Radiological work was covered under RWP #WTP-0125 Rev.013. Most of the release process followed procedure, except for small issue mentioned below. Other issues mentioned below can be summed up as poor Rad Work practices. (Finding) * Technical survey (b)(6) being used a second time after being counted, (b)(6) self-corrected this issue without any prompt. From about 20 to 25 technical (b)(6) seen, this was one isolated case, all others seen were done as required by procedure TF-RC-043. * An open bag of Low level radioactive waste was going to be left outside for the night, while the team working in the area (a couple of (b)(6)) where ok with it. DOE RadCon had to prompt (b)(6) . After (b)(6) surveyed out of the RBA ORP RadCon asked if the bag was going to be left there. (b)(6) response was "yes" because he was not going back there. After the (b)(6) exited the RBA and where getting ready to leave, ORP RadCon challenged the whole group asking the same question (is the bag going to be left there?) (b)(6) ", so the next question was if the bag, was going to be left there the whole night? Answer from (b)(6) . The next question to the group was, what would happen if winds pick up at night, which is where they quickly realized they needed to take it out of there. (b)(6) reached into the CA to take the bag out, close and perform the J seal to it. This contrary to Radiological control manual and 10CFR835.1102.
6/21/2018	WRPS-PER-2018-1614	Odors Detected Outside AW Farm	On 6/21/18, at approximately 0800, three workers (two (b)(6) s and one (b)(6)) who were supporting AW Stack Extension work outside the northeast gate at AW experienced what was described as a musty odor. One (b)(6) experienced eye irritation. The other two employees experience no symptoms.

6/21/2018	WRPS-PER-2018-1615	Inadequate HPI Training Material in Training Implementation Program (TIP)	When asked to help with formalization of a change to an HPI training course so it could be used to formally document the closure of a PER corrective action, I noted that the documents for that course that resided in TIP did not have any approval signatures, were dated May 2014 and January 2015 (which is >2 year review cycle as required by procedure) and were not in the current format for lesson plans. The HPI Manager was out of the office, so I contacted an individual in the HPI organization and he said that that training material located in TIP is not the most current version. TIP is the official location for all training materials for WRPS. TIP is a newly launched program but work has been in progress by the WRPS Training Organization over the past 1.5-2 years to gather all known training materials and locate them in TIP. Once this was/is done, those materials are to be updated to the most current version and any missing documentation/approvals (e.g. ADDIE documentation as required) are to be obtained so that the documentation is compliant with our procedures. Therefore, for this MOP, I focused on all active HPI courses in TIP. The following were the potential issues I identified:359451 - HPI for Knowledge Workers - Student handout approvals were dated January 2014 (which is >2 year review cycle as required by procedure). Power point was dated January 2015 with no lesson plan and no approvals nor in the current training document format. 359454 - HPI for Knowledge Workers Refresher - no training material located in TIP. Could not find any training material in any training location that I looked (e.g. other Share drives)359452 - HPI Dynamic Learning Lab - Lesson plan approval signatures were dated May 2015 (which is >2 year review cycle as required by procedure) and were not in the current format for lesson plans. Power point presentation was not the current version being used to train. 359453 - HPI for industrial Hygiene - no training material located in TIP352732 - HPI Basics for Managers/Supervisors - no training material located in TIP. Could not find any training material in any training location that I looked (e.g. other Share drives). However this may be tied to Initial Manager training but I was unable to verify this as both persons were not available to discuss the issue.350106 - Tank Farms Conduct of Operations/Human Performance Awareness - no training material located in TIP.357401 - Human Performance Practices Applied to Communications - A Power Point presentation was marked as revision 0 but had no approvals. A Training Plan with a signature page with no signatures was located in the lesson plan file identifier. No other training materials were found.307402 - Human Performance Tools for Planners and Procedure Writers - A power point presentation dated revision 1 July 2015 was in TIP. No other training documentation was located.I also identified several courses associated with HPI that also did not have any documentation in TIP, but I believe that they may need to be inactivated. If not, then appropriate training documentation and approvals need to be in place for these training courses:025110 - Introduction to HPI & ConOps (according to TAS - provided by Hanford Fire Department)025110 - HPI-ConOps Gap Training (according to TAS - provided by Hanford Fire Department)803006 - HPI Workshop - TAS has no information on it and no training material in TIP. It should be noted that the HPI suite of courses are not the only training courses that do not have the proper documentation in TIP. As courses are identified with no or lacking documentation, a training specialist should be assigned to work with the SME/POC to bring the training materials into compliance with procedures and ensure the most current version are located in TIP or removed and made inactive.
6/21/2018	WRPS-PER-2018-1616	HYDRAULIC LEAK FROM RENTAL FORKLIFT	It was observed by the DGR Grant FWS that during the usage of the Rental Forklift #GTH-844 it had leaked approximately one cup of hydraulic Oil on the ground.
6/21/2018	WRPS-PER-2018-1617	IH Pro Qual Card Process	Review of the IH Professional qualification card course completion record reveals active IH Professionals with extended periods of time since completion of the qualification card process. Additionally, it is unclear by the list who is currently authorized to serve in an IH role as former employees and personnel having no current IH duties appear to be current on the list. There is no requirement, however this may be opportunity for improvement.

6/21/2018	WRPS-PER-2018-1618	Identical EIN on Different Equipment	While walking down the HVAC system at 2101HV it was observed that the equipment ID number (EIN) of the disconnect for the outdoor AC unit on the West side of the building is the same as the equipment ID number of the disconnect for the outdoor AC unit on the East side of the building (see attached pictures).
6/22/2018	WRPS-PER-2018-1619	IHT Emergency Response / Shift Production Team Vehicle	With the DST farms moving to FFAPR, the work for the IHTs on shift is split between multiple farms at the same time. As of now, there is only one Vehicle for the 2 IHTs on shift with a spare key for one of the Daytime Vehicles. On backshift we utilize this vehicle regularly. On 6/22/18 at about 0415 I was preparing to return my respiratory protection equipment, and walked outside to hop in the rig to take it back. Once outside, I noticed the vehicle was gone. Someone working an overtime Dayshift, apparently has the "non-spare" key and had just drove away with it. Now, since this is an overtime worker, and I have no knowledge of who they are, or what job they are on, I am unable to return my RPE and the next crew, will now be a vehicle short again.
6/22/2018	WRPS-PER-2018-1620	Material Purchases charged to incorrect CACN	During a routine review of costs for the Procurement Management account (see CACN on Demand attachment), there were several pending material items purchased on Pcard. This account would not receive costs for material such as pumps, motors and other industrial/field use items. The team lead then looked at a fiscal year to date detail cost report which has item definitions and noted that this had occurred for months with some of the pending material items, converted to actual costs. (see attachment Cost Report)Then the team lead contacted the P Card Administrator to further assess the situation and it was revealed that material coordinators use a 'default' CACN which happens to be the Procurement Management CACN when a correct CACN is not available or inattention to detail when placing the order. In addition, the material coordinator is assigned a CACN in order to use the purchasing system and the CACN is the Procurement Management CACN.

6/22/2018	WRPS-PER-2018-1621	Update the OBS-WBS Integration Data	Received a call from the Project Management Office group concerned that the OBS-WBS Integration information found on the WRPS Organization Charts webpage has not updated since the initial roll out in October 2017.
6/22/2018	WRPS-PER-2018-1622	SY Emergency Shower Fire	While supporting MSA Water Utilities for initial fill and shock of SY Emergency Shower, the in-tank heater caused the holding tank to melt and catch on fire. After the Fire Marshall investigated, it was also revealed that the heating element was drooping down toward the bottom of the holding tank which may have been a contributing factor.
6/25/2018	WRPS-PER-2018-1623	FURTHER LOOK AT COMPATIBLE CHEMICALS	There are other chemicals that may be useful as fixatives to be include in RPP-11192.

6/25/2018	WRPS-PER-2018-1624	Procedure step not performed in order.	TO-080-403 step 5.5.21 requires notifying RadCon to initiate an In-Process ALARA review upon completion of the High Radiological Risk portion of the work (completion of riser restoration). This was not signed at the appropriate time. The Post Job radiological survey step in WO-350860 was signed 3/9/2018 (RSR WTP-18000326). The step for scheduling a Post Job ALARA Review was signed 6/19/2018 (review scheduled 6/25/2018). Review of work documents in preparation for the Post Job ALARA Review identified that the In-Process Review step had been signed 6/20/2018.
6/25/2018	WRPS-PER-2018-1625	WRPS-RMA-009 Labeling Deficiencies	1. There are 2 packaged items one labeled radioactive material is in reinforced 20' wide, although the radioactive material sticker is faded and not able to be read, the other is in yellow impermeable material is not labeled. See Photos: RMA009-1, RMA009-2, RMA009-3 2. There are numerous items in the RMA that are either unlabeled or the labels are faded and can't be read. See photos: RMA009-1-10 3. Labels for packaging are affixed to the exterior of packaging on 1 item (see 1 above). 4. There is wood that appears to be used for cribbing stored within the RMA that is not labeled as Rad Material. There are 2 pallets of lead blankets stored in the RMA of which only some are labeled as Rad Material and some are not. There is also a pallet of shield plugs that are not labeled stored there. See photos: RMA009-5, RMA009-6 and RMA009-.
6/25/2018	WRPS-PER-2018-1626	Calibrated M&TE Not Loaded Into EAM Before Placing into Service	WO 290467 used M&TE #825-45-08-020 Fluke 1577 Insulation Tester that was not reflected in the SmartPlant that EAM is linked to. This indicates that a new piece of calibrated M&TE was placed into service prior to this SmartPlant being updated. When a calibrated M&TE fails calibration all work orders using that piece of M&TE must be identified by a search of EAM to support an engineering evaluation for impact on the SSC based on the out of calibration data. The inability to search EAM is compromised for calibrated M&TE that is not entered into the SmartPlant that EAM links to prior to placing that equipment in service.

6/25/2018	WRPS-PER-2018-1628	Wind blown debris out of LERF basin 42	There was an issue we had Friday morning where a dust devil came through Basin 42 blowing small leaf like material that was contaminated out of Basin 42 and into the gravel area just outside the Basin. The dust devil came through the work area just as we had made our first cut and were in the process of removing the first section of the cover. This is why we had not yet wet down the few dried areas and removed the contamination (which is what our current process allows).
6/25/2018	WRPS-PER-2018-1631	Radiological posting issue at WRPS-RMA-206	A large amount of tumbleweeds were piled up against the west fence line with some tumbleweeds inside the S Complex. Fence perimeter was full of tumbleweeds along with tumbleweeds visible inside S Complex fence. WRPS-RMA-206 (see attached picture) is posted inappropriately. This trailer needs a Radioactive Material Area sign. Notified RMA custodian and TFP RadCon. They stated they were posting the trailer. Performed a followup on 06/25/18 to verify sign was posted and it had not been.
6/25/2018	WRPS-PER-2018-1630	Ignition Source Control Requirements Screening Form Improvement	During a MOP interview, feedback was provided which indicated that work packages cannot be closed without the Ignition Source Control (ISC) Requirements Screening Form (A-6003-774) Sections III and IV being completely filled out.

6/25/2018	WRPS-PER-2018-1632	Table of Contents was not revised when revising (adding a new section) to ETF-018-001.	Procedure ETF-018-001, "Compressed Air Systems Operations" was revised on 05/24/2018 to add section 5.4 Manual Startup (Auxiliary Air Compressor Running). The Table of Contents was not revised to include section 5.4.
6/25/2018	WRPS-PER-2018-1633	Tumble Weeds inside and outside of U Farm	There is a build up of tumble weeds inside and outside of U farm. The farm could also use some house keeping.
6/25/2018	WRPS-PER-2018-1634	P-B-1 Recirculation Pump High Vibration	P-B-1 vibration alarm was received in the 242-A control room. the alarm was intermittent at first but eventually locked in.

6/25/2018	WRPS-PER-2018-1635	EAPC Safety Book - Noncompliance Issue	Hallway lighting in 200E / 2750E / B-Wing / 2nd Floor is noncompliant. After receiving issue during weekly check of the EAPC safety book in 2750, I walked the hallway mentioned in the detail sheet. I then went to IHT supervisor to complete a lighting survey (attached). After lighting survey complete, it was reported back to me by IHT that there were areas that were not procedural compliant per TF-OPS-008: Attachment 1 - OSHA Hazwoper Illumination Standards - Hallways should be at 5 foot candles (FC).
6/25/2018	WRPS-PER-2018-1637	Asbestos Exposure Control and Management Procedure TFC-ESHQ-5_IH-C-52 Table 3. Training Requirements For Each Role	A review of the Asbestos Exposure Control And Management procedure TFC-ESHQ-5_IH-C-52 and the findings indicate that the procedure needs to be modified or changed to address training concerns listed below: Table 3. Training Requirements for Asbestos Activities indicates that Asbestos Program SME, Asbestos Field IH, AHERA Project Designer/Planner and the AHERA Management Planner all specify the AHERA Management Planner as a training course required for each Role. The AHERA Management Planner course has been discontinued at HAMMER. An e-mail was sent out on March 7, 2018 from the Asbestos SME indicating the change was forth coming however the procedure has not been changed to date. The Asbestos SME has changed recently. I notified the new SME of the need for the change in the training and need to modify the Asbestos Exposure Control and Management procedure.
6/25/2018	WRPS-PER-2018-1638	Review of Procedure ARP-T-041-00003 - TMACS Alarm Response	1. Since the AY Settlement Agreement between Washington River Protection Solutions and U.S. Department of Energy, Office of River Protection v. State of Washington, Department of Ecology (Ecology) PCHB No. 14-041c, is no effective, procedure ARP-T-041-00003 - TMACS Alarm Response should be revised to delete references to RPP-PLAN-60074, Tank 241-AY-102 Monitoring Plan. 2. Page 16 of ARP-T-041-00003 - TMACS Alarm Response identifies responses for high temperature. This section of the procedure should be revised to include both waste transfer and chemical additions as possible causes for high temperature. 3. Page - 16. Additionally the alarm status for high temperature should be evaluated by Nuclear Safety as high temperature maybe a result of waste transfer/chemical additions and may result in flammable gas issues 4. Page 14 Tank Annulus ENRAF request that Nuclear Safety evaluate the Alarm Class. Should the Alarm Class be reclassified to non-TSR Defense-in-Depth?

6/25/2018	WRPS-PER-2018-1639	AY101 Leak Detection Pit exceeds Maximum authorized Limit and needs to be Pumped	AY101 Leak Detection Pit Level is at 16.6" which is above its maximum authorized limit of 16" per OSD-T-151-00007.
6/25/2018	WRPS-PER-2018-1532	Courses Missing 2-Year Review	TFC-BSM-TQ-ADD-C-01 Conduct of Training Administration requires that all courses in TIM-applicable option sets be subject to biennial review. This is to ensure TOC Training courses meet the DOE Order 426.2 requirement for course reviews once every three years. Courses 350108, 350031, 350041 and 356631 are not in TIM-applicable option sets. However, as a good practice, they should be subject to the same biennial review as TIM-applicable courses, and none of them have been reviewed for at least two years.
6/25/2018	WRPS-PER-2018-1640	PB-1 Vertical Vibration Alarm	Received single PB-1 vibration alarm, entered ARP-T-601-012, and evaluated for trend/changes. Notified Engineering who responded and evaluated condition. Unable to determine if immediate pump shutdown was necessary, upon further evaluation and recommendation from engineering PB-1 was shutdown and restarted to determine if condition would clear.

6/25/2018	WRPS-PER-2018-1650	Sample Labeling Deficiency found in WRPS-RMA-135	During the monthly RMA inspection the following deficiency was found: In the refrigerator in RMA WRPS-RMA-135 there are four TEDF samples not labeled with the words "Caution Radioactive Material". The samples are labeled with a trefoil, but not as required to be stored in the RMA.
6/25/2018	WRPS-PER-2018-1651	Response to PB1 Pump Vibration	On June 25, 2018, the a high vibration alarm, 242-AVI-PB1-2A came in on the MCS. The applicable Alarm Response Procedure (ARP-T-601-12) directs the shutdown of PB-1 if the high vibration persists for greater than 5 minutes. The pump was operated beyond the APR limits while evaluation of the high vibration was performed. The set point for this alarm is 0.6 in/sec. The other two vibration readings from the pump remained below the set point. The increasing trend on the 2A instrument appears to have started around the time the waste reached the target SpG and we began to slurry out. Operations and Engineering monitored the vibration throughout the day and about 1400, the vessel was put into recirc under vacuum and the PB-1 pump shut down for a 2 minute period. This was intended to eliminate a potential harmonic that might have developed at this SpG and pump frequency. Upon restart of PB1, the vibration had reduced but not below the set point. The Alarm Response Procedure is a listed below: Facility: 242-A Evaporator YELLOW Graphic: 12A Alarm #: N/A VI-PB1-2A Panel: N/A Source: VE-PB1-2S Setpoint: 0.60 in./sec. Alarm Class: Plant stability Alarm Description: PB-1 PUMP VERTICAL VIBS (HIGH) (G12, F5); Pump PB-1 vertical vibrations are above the high alarm setpoint. Automatic Actions: None Immediate Actions: [1] CHECK VI-PB1-2A PB-1 PUMP VERTICAL VIBS (G12, F5) indication. [1] CHECK PB-1 vibration Current Trend traces for recent changes: [1.1] PRESS CURR TREND, 6 AND ENTER. [1.2] CHECK VI-PB1-1A, VI-PB1-2A and VI-PB1-3A traces for trends. [1.3] NOTIFY the Shift Manager.
6/26/2018	WRPS-PER-2018-1652	Contaminated Bird Feces / Egg Shell	During the performance of a Scheduled Radiation Survey Task Description (LE-D012) at ETF, contaminated bird feces and bird egg shell were discovered. Total Contamination of; Surge Berm (Radiological Buffer Area): Location # 1 (feces): 31,000 dpm/100 cm2 Beta-Gamma and 14 dpm/100 cm2 Alpha, Location # 2 (egg shell): 8,000 dpm/100 cm2 Beta-Gamma and <500 dpm/100 cm2 Alpha No removable contamination was detected. The locations were deconned. Survey results are documented in Survey Simple on survey # LE-1801262

6/26/2018	WRPS-PER-2018-1653	Contaminated Bird Feces	During the performance of a Scheduled Radiation Survey Task Description (LE-W095) at ETF, contaminated bird feces was discovered. Total Contamination of; Area between Basin 42 and Basin 43 (Radiological Buffer Area): Location # 1: 3,200 dpm/100 cm2 Beta-Gamma and <500 dpm/100 cm2 Alpha, Location # 2: 10,260 dpm/100 cm2 Beta-Gamma and <500 dpm/100 cm2 Alpha No removable contamination was detected. The locations were deconned. Survey results are documented in Survey Simple on survey # LE-1801265
6/26/2018	WRPS-PER-2018-1656	AZ102 ENRAF	Missed reading, ENRAF Out of Service
6/26/2018	WRPS-PER-2018-1654	Leak Detection Systems inoperable past 24 hour limit during planned outage.	All 3 annulus ENRAFs and annulus CAMs for 241-AY-101 primary were taken out of service to support maintenance (planned electrical outage) at 0806 on 6-7-18, but leak detection systems were not returned to service until 2118 on 6-8-18.

6/26/2018	WRPS-PER-2018-1655	Unplanned shutdown of 241-AN A-Train Exhauster.	241 AN A-Train shutdown at 1430 hours on 6/19/2018 due to a failed flow control valve for the CAM.
6/26/2018	WRPS-PER-2018-1599	Work Orders did not meet the JRG Screening Criteria form, TFC-OPS-MAINT-STD-02 DID, Work Planner Review in WORA checklist	Work Order 362823 and 381090did not have the proper requirements completed during the planning process. Work Order 381090 "Disconnect and Remove AN Farm HIHTL at POR104/POR138" removed HIHTLs from AN farm. Work Order 362823 "Drained/Isolated C-Farm Water Skids" and manifolds by cutting and/or disconnecting the water hoses prior to disposal. During performance of this WO 362823, a water hose was cut that inadvertently did not have the heat trace locked out. No field issues were encountered in WO 381090 Upon review of the work packages, three items were found not that failed to be completed correctly. 1.A Joint Review Group (JRG) Screening Criteria item was not checked, that would have required a Risk Analysis for Work Activities to be completed. The checklist item states the following (the bottom "NOTE" is the criteria not met): "First time unique processes or activities that have not been previously performed on the project, or are infrequently performed (less often than once per year). This is not intended to capture low- or medium-hazard activities performed on an infrequent basis, such as annual surveillance/maintenance activities or routine corrective maintenance, but rather to include those higher risk activities that may require additional consideration because of infrequent performance. NOTE: This includes abandoned/deactivated equipment activities where Defense-In-Depth controls are required, and demolition where there is permanent removal of facilities and/or equipment." 2.The requirement from TFC-OPS-MAINT-STD-02 'Work Planning and Work Instruction Development' Section 3.12.10 Removal of Abandoned/Deactivated Equipment was not implemented into the work instructions. This requirement states: "Electrical energy sources - Depending upon actual equipment configuration and accuracy of facility drawings, there is an increased potential for unidentified energy sources to be present during removal of abandoned/ deactivated equipment. When planning this type of activity, additional consideration shall be given to: Use of a non-contact proximity tester to detect energized electrical prior to cutting of lagged pipes or materials with the potential to contain hidden electrical hazards (e.g., lagged exterior water piping)." 3.Planner Pre-Review WORA checklist item #20 was not verified. This checklist item states: "You have reviewed the scope of this activity against the Defense In Depth section of TFC-OPS-MAINT-STD-02 and incorporated controls/information if applicable."
6/26/2018	WRPS-PER-2018-1665	TO-140-170, "Pressure Testing of Pipe-In-Pipe Encasements" Discrepancy	TO-140-170, "Pressure Testing of Pipe-In-Pipe Encasements", Step 5.1.20 states, "MONITOR temperature instrument during pressurization to ensure supply air temperature does not exceed 120F" which meets the requirement of 180F with a margin. Data Sheet 1, "Air Source/Supply Temperature" includes recording the start and end temperatures with a confirmation that the temperature remained below 150F which also meets the requirement of 180F with a margin however the two limits should be the same. The Project Engineer explained that the lower temperature limits with a margin to the DID requirement was to allow time for the field crew to respond before the temperature exceeded the DID limit. Engeman did agree that the limits should be the same in the two locations of the procedure (120F vs. 150F).

6/26/2018	WRPS-PER-2018-1579	2704HV East Parking Lot Uneven Walking Surface	East Parking Lot of 2704HV: 6/19/18: The tripping hazard is the area located between the chain link fence and the railroad ties. It appears to need additional gravel. POC is Duff Wonders (Safety Specialist). Three people have been observed tripping in this area. WRPS-PER-2018-1579 was drafted after 60 days as a open safety concern to stay in compliance with TFC-ESHQ-S_SAF-C-14, REV B.
6/26/2018	WRPS-PER-2018-1608	Changes are needed to TFC-OPS-OPER-C-14 to provide guidance with respect to the use of PII and OUO information	Washington River Protection Solutions LLC (WRPS), Production Operations Performance Assurance organization conducted a management-directed assessment to evaluate the adequacy of Event Investigation Reports (EIRs) completed from January 1, 2017 to September 1, 2017. Passing grades were achieved overall in all of the EIRs reviewed. There were no Findings. The following is an Observation from the assessment: Observation 1: • Some EIRs contain personally identifiable information that may reveal more information than intended. Several of the reports reviewed had copies of logbook pages, odor response cards, equipment checkout logs, fact finding meeting attendance forms, and other documentation that provides names of individuals that may have been personally involved in a certain event, or perhaps tied to other actions not pertinent to the investigation (as in other logbook entries on the page with the entries of note), incorporated into the final document. There were some attempts made at redacting the names in certain instances, but the guidance in determining what should be pertinent information to the report is vague or non-existent. • TFC-OPS-OPER-C-14 has no guidance on OUO material. In researching whether names in logbook entries should be redacted, it was determined that the Central Shift Office logbook is being controlled as Official Use Only (OUO). Attachment C – "EVENT INVESTIGATION REPORT GUIDE", of TFC-OPS-OPER-C-14, "Event Investigation Process", suggests adding the logbook entries as an attachment to the EIR. TFC-OPS-OPER-C-14 has no guidance on OUO material. The EIR will eventually be attached to the PER, and the PER procedure, TFC-ESHQ-Q_C-C-01, "Problem Evaluation Request", states: "The PER system is not a secure location for OUO material". The addition of the logbook pages as attachments to an EIR may be contrary OUO guidance, including MSC-PRO-SEC-54063, "Identifying, Marking, and Protecting Official Use Only (OUO) Information".
6/26/2018	WRPS-PER-2018-1609	The template for the EIR needs to be revised to ensure all DOE O criteria included and terminology consistent	Washington River Protection Solutions LLC (WRPS), Production Operations Performance Assurance organization conducted a management-directed assessment to evaluate the adequacy of Event Investigation Reports (EIRs) completed from January 1, 2017 to September 1, 2017. Passing grades were achieved overall in all of the EIRs reviewed. There were no Findings. The following is an Observation from the assessment: Observation 2: • Lessons learned sharing is a major part of the requirements flow-down from DOE O 422.1. TFC-OPS-OPER-C-14 alludes to Lessons Learned in several locations, but does not put an emphasis on this topic. Most of the reports reviewed do not mention lessons learned at all. Add guidance in the EIR template that would drive the investigator to consider recommending a Lessons Learned as a potential corrective action. • DOE O 422.1, Attachment 2 Paragraph 2.f.(5)b, suggests that the impact of the event be contained within the report. Almost half of the reports were negligent in discussing the impact the event had on the facility. Add guidance in the EIR template to ensure that the impact of the event is discussed in the report. • The term "Fact Finding" is utilized by the procedure, TFC-OPS-OPER-C-14, in reference to a specific meeting held at the onset of an Event Investigation. "Critique" and "event investigation meeting" have also been used. This lack of uniform terminology can cause personnel or managers involved in an Event Investigation to be confused as to the process. TFC-OPS-OPER-C-14 places emphasis on the details of this meeting but also states that it is not a required function of the investigation. Roughly one third of reports reviewed made no mention to the Fact Finding. • Both the DOE order and the procedure suggest relaying any positive aspects found as the result of the investigation. Less than 30% of the reports reviewed made mention of any positive aspects. Add this reference in the EIR template; too often the author is focusing on the negative aspect of the event

6/26/2018	WRPS-PER-2018-1611	The Site Forms associated with TFC-OPS-OPER-C-14 need changes to be consistent with the procedure.	Washington River Protection Solutions LLC (WRPS), Production Operations Performance Assurance organization conducted a management-directed assessment to evaluate the adequacy of Event Investigation Reports (EIRs) completed from January 1, 2017 to September 1, 2017. Passing grades were achieved overall in all of the EIRs reviewed. There were no Findings. The following is an Observation from the assessment: Observation 3: • The Event Investigation Attendance Form (A-6003-100) should be renamed "Event Fact-Finding Meeting" or similar to better align with the procedure. • Change the title of Initial Event Investigation Personal Statement (A-6003-098). The term "Initial" was removed from the title of TFC-OPS-OPER-C-14
6/26/2018	WRPS-PER-2018-1612	Remove the On-the-Job Training (OJT) card for "Critique Leader," from the OJT Cards webpage	Washington River Protection Solutions LLC (WRPS), Production Operations Performance Assurance organization conducted a management-directed assessment to evaluate the adequacy of Event Investigation Reports (EIRs) completed from January 1, 2017 to September 1, 2017. Passing grades were achieved overall in all of the EIRs reviewed. There were no Findings. The following is an Observation from the assessment: Observation 4: Remove the On-the-Job Training (OJT) card for "Critique Leader," Course Number 35423 from the OJT Cards webpage. This card and course is inactive.
6/26/2018	WRPS-PER-2018-1666	Suggested Improvement to TFC-ENG-CHEM-D-21,	While interviewing system support engineers for CRAD NO. 17 Waste Surface Level Monitoring and Trending Defense-in-Depth Feature (DSA Table 3.3.2.3.2-2, Item 30), it was noted by interviewees TFC-ENG-CHEM-D-21 has no defined criteria or performance measurement requirements for waste surface level monitoring V&V or trend analysis outside the requirement to perform these activities. Each engineer has a different set of self-identified parameters which could result in varied interpretations or tolerance levels for anomalies based on tank farm/assigned Design Authority. Interviewees indicated V&V activities could overlook potential gas accumulation or a minor GRE and attribute the event to instrument error or evaporation, assuming a similar gas accumulation to evaporation rate. Suggestions were made for trending analysis to include a minimum twelve month duration and comparison of level data with barometric pressure and precipitation. Similarly for V&V, guidelines for acceptable margins and general parameters would improve consistency between reviewers/tank farms.

6/26/2018	WRPS-PER-2018-1667	Coordination between Evaporator and Transfer Engineering	Using a small team of CSEs, Evaporator Engineers and Transfer engineers determine if any procedure or checklist items need to be strengthened to ensure integration between evaporator and TF in the development of evaporator campaign procedures/memos.
6/26/2018	WRPS-PER-2018-1668	Instrument calibrations throughout the ETF fail to include Control Room Readings (HMI Readings)	Many of our loop calibrations fail to take a control room reading. For as long as WRPS has had this facility the Instrument Technicians have been asking that this value be added to our data sheets, along with a tolerance so we know what operations is reading is correct.
6/26/2018	WRPS-PER-2018-1669	ETF flagpole stability	The ETF Safety Representative noticed that the 2025EA flagpole on the East side of the building has tipped very slightly and was concerned about the stability of the pole. He was concerned there might be some structural fatigue in the pole at the base. This he mentioned to the SOM on duty (after everyone from the building had left).

6/27/2018	WRPS-PER-2018-1595	Expired ERO Training	EP-PE 3 - Training and Drills While conducting a review of the 222-S HSWET for ERO members it was discovered that a current member was expired on a required Hanford ICS training course. The expired training had not been identified during a PI review at the beginning of the month. The training course had not been set as part of the ERO members training plan so no notifications were sent to the ERO member when the course expired and it displayed as a dull pink in the HSWET system rather than a normal red when expired and part of a set training plan.
6/27/2018	WRPS-PER-2018-1462	Evaluate the need for Controlled Print File (CPF) use at ETF.	During the presentation of the recent Configuration Management program management assessment completed during FY2018 to the ESRB, issues were identified with use of the ETF Controlled Print Files (CPF). Specifically, it was noted that the use and function of Controlled Print Files in the Tank Farms has been eliminated and replaced by the implementation and use of Smart Plant Foundation (SPF). Controlled Print Files (CPF) are manually maintained by Document Control personnel and the process is costly and potentially prone to error. The use of hard copy Controlled Print Files should be eliminated in favor of use of the electronic Document Control System (SPF) relied on for other facilities and as the basis of emergency management.
6/27/2018	WRPS-PER-2018-1682	Review of the ALARA Design Review Checklist (form A-6003-994, Rev. 5)	A review of the ALARA Design Review Checklist (form A-6003-994, Rev. 5) shows that the form does not take into consideration any contamination control evaluations when completing section I. Section I only considers whether whole body dose greater than 1 is received during the project activity or if greater than 10 person-Rem over the life time of the project is received. If neither of these trigger values are exceeded, the remaining sections of the form are not required to be filled out. The remaining sections of the form (sections II through XXIII) have multiple consideration questions to evaluate contamination controls for the project. If the project being evaluated does not have whole body dose rates associated with the activities, the form may direct the preparer away from performing any contamination control considerations for ALARA Design purposes. Discussions with the WRPS Company Technical Authority for ALARA Design Review revealed that the form was designed using 10CFR835 Subpart K requirements that state:(a) Measures shall be taken to maintain radiation exposure in controlled areas ALARA through engineered and administrative controls. The primary methods used shall be physical design features (e.g., confinement, ventilation, remote handling, and shielding). Administrative controls shall be employed only as supplemental methods to control radiation exposure.(b) For specific activities where use of engineered controls is demonstrated to be impractical, administrative controls shall be used to maintain radiation exposures ALARA.

6/27/2018	WRPS-PER-2018-1681	Numerous drip container ID tags in the process area are becoming illegible	While performing a focused MOP of the routine weekly contamination surveys of catch containers and catch pans (LE-W100) in the ETF process area, I noted that numerous containment ID tags were becoming difficult to read (numbers had faded or been smudged).
6/27/2018	WRPS-PER-2018-1673	Improper Notification of LOTO AWL Lock Removal at 222-S	On Friday 6/22/18, during swing shift, six AWL locks were removed in support of Work Order #363054, "Exhaust Fan Upgrade/MCC1 Removal and 222-SM Tie-in." Of the six AWL locks to be removed, four personnel were properly notified per DOE-336. Notifications to the remaining two maintenance craft personnel were LTA to meet the intent of DOE-336.
6/27/2018	WRPS-PER-2018-1684	SOME HEPA FILTERS DO NOT HAVE A PM IN EAM THAT IDENTIFIES REPLACEMENT DUE DATES	Some HEPA filters do not have a PM in EAM that identifies the required replacement due date. The TOC HEPA FILTER MANAGEMENT PLAN, RPP-RPT-54544, requires all PIC-1 through PIC-4 HEPA filters be replaced in accordance with the plan. PMs were established for some but not all of the applicable filters.

6/27/2018	WRPS-PER-2018-1670	Safety Shower Use	EP P/E 8 - Facilities and Equipment On April 24th, 2018 the WRPS Emergency Management department conducted an emergency preparedness Field Drill that involved Tank Farms Emergency Response Organization, shift production and projects personnel responding to simulated waste spill from a suspended object at AZ Farm. (EM-PO-FD-2018-04-01) The Safety Shower door, when open, allows for substantial amounts of over spray and runoff to come out of the shower door, which could lead to contamination spread. (P/E 8.13 – Equipment Response)
6/27/2018	WRPS-PER-2018-1671	Safety Shower Equipment	EP P/E 8 - Facilities and Equipment On April 24th, 2018 the WRPS Emergency Management department conducted an emergency preparedness Field Drill that involved Tank Farms Emergency Response Organization, shift production and projects personnel responding to simulated waste spill from a suspended object at AZ Farm. (EM-PO-FD-2018-04-01) The Safety shower is not equipped with scissors to assist with removal of contaminated clothing. The safety shower does not have blankets, towels to dry off with, or disposable PPE to dress affected personnel once they have been showered for 15 minutes. Personnel may be adversely affected by the temperature of the water in the safety shower and there isn't supplies readily available to assist in mitigating this. (P/E 8.15 - Equipment Response)
6/27/2018	WRPS-PER-2018-1672	Event Discoverer Training - Field Work Supervisors	EP P/E 3 - Training and Drills On April 24th, 2018 the WRPS Emergency Management department conducted an emergency preparedness Field Drill that involved Tank Farms Emergency Response Organization, shift production and projects personnel responding to simulated waste spill from a suspended object at AZ Farm. (EM-PO-FD-2018-04-01) Currently Field Work Supervisors are not identified as requiring 35E006 Event Scene Response Training. The Field Work Supervisors may be unaware of the expected actions of event discoverers and direct their crew to respond differently such as what to do when Take Cover sirens are heard. (P/E 3.10 - Training Program)

6/27/2018	WRPS-PER-2018-1674	Timely Dispatch of ERO (Emergency Response Organization)	EP P/E 6 - Emergency Response Organization (ERO) On April 24th, 2018 the WRPS Emergency Management department conducted an emergency preparedness Field Drill that involved Tank Farms Emergency Response Organization, shift production and projects personnel responding to simulated waste spill from a suspended object at AZ Farm. (EM-PO-FD-2018-04-01) It is imperative for effective event response that the ERO team is dispatched in a timely manner to the event scene. The BED dispatched the ERO but they did not arrive for 20 minutes due to coordination of resources, gathering of supplies, and waiting for personnel and supplies. This hindered event response coordination with HFD. (P/E 6.20 - ERO Operations)
6/27/2018	WRPS-PER-2018-1675	Event Scene Accountability	EP P/E 6 - Emergency Response Organization (ERO) On April 24th, 2018 the WRPS Emergency Management department conducted an emergency preparedness Field Drill that involved Tank Farms Emergency Response Organization, shift production and projects personnel responding to simulated waste spill from a suspended object at AZ Farm. (EM-PO-FD-2018-04-01) Effective event scene accountability was not demonstrated by either the FWS of his crew or by the responding ERO. Personnel accountability is imperative to maintain the safety of personnel. (P/E 6.33.10 - ICS)
6/27/2018	WRPS-PER-2018-1676	Event Scene Command and Control	EP P/E 6 - Emergency Response Organization (ERO) On April 24th, 2018 the WRPS Emergency Management department conducted an emergency preparedness Field Drill that involved Tank Farms Emergency Response Organization, shift production and projects personnel responding to simulated waste spill from a suspended object at AZ Farm. (EM-PO-FD-2018-04-01) Command and control at the event scene was not demonstrated effectively by all ERO members. Establishing roles and responsibilities during event response and maintain proper chain of command is imperative to successful event response. (P/E 6.6 - ERO Organization Structure)

6/27/2018	WRPS-PER-2018-1677	Firefighter doffing Training - non-shift personnel	EP P/E 3 - Training and Drills On April 24th, 2018 the WRPS Emergency Management department conducted an emergency preparedness Field Drill that involved Tank Farms Emergency Response Organization, shift production and projects personnel responding to simulated waste spill from a suspended object at AZ Farm. (EM-PO-FD-2018-04-01) Many of the work crew from the AZ-102 pump pull job self-identified they had not doffed a firefighter before. As HPTs, IHTs, and NCOs they may be requested to assist in this activity and should be trained to do so. (P/E 3.10 - Training Requirements - Onsite)
6/27/2018	WRPS-PER-2018-1678	Emergency Equipment Location	EP P/E 8 - Facilities and Equipment On April 24th, 2018 the WRPS Emergency Management department conducted an emergency preparedness Field Drill that involved Tank Farms Emergency Response Organization, shift production and projects personnel responding to simulated waste spill from a suspended object at AZ Farm. (EM-PO-FD-2018-04-01) The location of emergency equipment (e.g., emergency safety shower, emergency decon kits) should be closer to high risk work. The closest emergency safety shower to AZ-102 is the AN Emergency Safety shower that is ~ 170 meters (557 feet) from AZ-102 outside of AN Farm. (P/E 8.12 - Equipment (Response))
6/27/2018	WRPS-PER-2018-1679	Drillsmanship	EP P/E 3 - Training and Drills On April 24th, 2018 the WRPS Emergency Management department conducted an emergency preparedness Field Drill that involved Tank Farms Emergency Response Organization, shift production and projects personnel responding to simulated waste spill from a suspended object at AZ Farm. (EM-PO-FD-2018-04-01) Good drillsmanship was not observed throughout the drill. Controllers noted misuse of instruments, sporadic/inconsistent survey speeds, simulating actions without controller approval, asking for information without performing an action, boundary violations uncorrected, and instruments with daily source check of the day before. Many players noted this was the first drill they had participated in. (P/E 3.17 - Drills)

6/27/2018	WRPS-PER-2018-1680	Event Scene Habitability Monitoring	EP P/E 3 - Training and Drills On April 24th, 2018 the WRPS Emergency Management department conducted an emergency preparedness Field Drill that involved Tank Farms Emergency Response Organization, shift production and projects personnel responding to simulated waste spill from a suspended object at AZ Farm. (EM-PO-FD-2018-04-01) Ground surveys and IH monitoring were on-going at the event scene. An air sampler was not set-up and monitoring started until an hour after the event. Knowledge of where to find one and power to operate it at the event scene was not demonstrated by the majority of the personnel. (P/E 3.17 - Drills)
6/27/2018	WRPS-PER-2018-1685	Forklift rolled backward	Forklift HO-75-04117 parked on the north side of farm in a CA rolled backward about 200' coming to rest on C-111 dome
6/27/2018	WRPS-PER-2018-1686	Drawing Inconsistencies in the H-14-107346, DST Waste Transfer Piping Diagram Legend	According to TFC-ENG-STD-10, Drawing Standard, "Symbology used on drawings that defines components needs to be traceable to an engineering drawing (see Section 3.16.1) or a LEGEND placed on the drawing." The H-14-107346 Legends is not all inclusive, for example: - The Process Blank in the legend has a blue asterisk, but in the drawing there are occurrences of an all-black Process Blank. - The Capped Line in the Legend is all black, but in the drawing there are also blue Capped Lines. - The Legend includes solid green lines and dashed green lines using a "dash dit dit" pattern but the drawing also includes lines with a green "dit dit dit" pattern. - The intra-sheet references are all-black text in the Legend, but the drawing sheets have all blue and all red references as well. The H-14-107346 Legend has an identified 53 symbols/components in its Legend. ERB has a collection of 266 symbols in its Legend. ERB used 51 symbols that match one-to-one in the H-14-107346 Legend; 2 symbols were not used in the data import process. 111 new symbols/icons were created for components that were not on the H-14-107346 Legend. 104 Symbols in the ERB Legend have been identified as "variations" of existing or new symbols and were created to account for variations in how the symbols were drawn.

6/27/2018	WRPS-PER-2018-1687	Employee Exit Property Review: 10/1/17 - 5/31/18	Reviewed listing of all WRPS Manager, Exempt and Non-Exempt employees that exited the company between 10/1/17 and 5/31/18 to ensure that property records had been reviewed/updated in accordance with TFC-BSM-FPM_PR-C-01, Property Management, Section 4.3.4 - Review and Reassignment of Employees Leaving WRPS. During the eight month period of time, 69 employees exited and of that set, five(5) employees (7%) were still listed in Sunflower Asset Management System (SAMS) as Custodian of property item(s). None of the 69 employees were listed as Custodian of vehicles/equipment in EAM.
6/27/2018	WRPS-PER-2018-1688	Proto Torque Wrench "As Found" Out of Tolerance during calibration	Proto Torque Wrench, Model# 6064C, Serial # DNK65795 (M&TE # 825-88-01-005) "As Found" reading during calibration was Out-Of- Tolerance. It was adjusted to manufacturer spec.
6/27/2018	WRPS-PER-2018-1657	ATS-MP-1032 revisions are needed to resolve QA independent assessment observations	QA Independent Assessment FY2018-WRPS-I-0010, Observations O-01 & O-02 noted bullet references and a requirement matrix need edits to better align. O-01: Chapter 1 of ATS-MP-1032 needs revised to either add the implementing documents to the bullets noted or delete the bullets altogether. Additionally, Table 1-1 should be revised to ensure all the implementing procedures noted are in the Matrix. O-02: Revise Table 1-1 to list the implementing procedures in the text and review TFC-PLN-41 to determine if it warrants a listing in the table.