



Department of Energy
Savannah River Operations Office
P.O. Box A
Aiken, South Carolina 29802

APR 03 2013

The Honorable Peter S. Winokur
Chairman
Defense Nuclear Facilities Safety Board
625 Indiana Avenue, NW, Suite 700
Washington, DC 20004

Dear Mr. Chairman:

SUBJECT: Transmittal of Defense Nuclear Facilities Safety Board (DNFSB) Recommendation 2012-1 Implementation Plan (IP) Deliverable 3-3, (Letter, Hunt to McGuire, Updated F-Area Drill Plan Revision, 04/01/13)

This letter transmits a deliverable consistent with Commitment 3-3 of the Department of Energy's IP for DNFSB 2012-1, Savannah River Site Building 235-F Safety. The deliverable is an updated F-Area Drill Plan that explicitly describes the level of participation, and the drill dates for the facilities and construction sites surrounding Building 235-F.

We will continue to work with your staff to effectively respond to the concerns raised in the recommendation, and complete the IP.

If you have any questions please contact me, or have your staff contact Patrick McGuire, Assistant Manager for the Nuclear Material Stabilization Project at (803) 208-3927.

Sincerely,

A handwritten signature in black ink, appearing to read "T. Z. Moody", is written over the typed name.

David C. Moody
Manager
DC

NMPD-13-0024

Enclosure:
Letter, Hunt to McGuire, 04/01/13

cc w/encl:
David Huizenga, EM-1
Matthew Moury, EM-40
Todd Lapointe, EM-41
Marie-Josette Campagnone, HS-1.1

Enclosure: Letter, SUBJECT: Transmittal of
Defense Nuclear Facilities Safety Board Recommendation
2012-1 Implementation Plan Deliverable 3-3, dated

APR 03 2013

April 1, 2013

SRNS-N0000-2013-00026
RSM Track No. 10048

Mr. Patrick W. McGuire, Assistant Manager
Nuclear Material Stabilization Project
Savannah River Operation Office
P. O. Box A
Aiken, SC 29802

Dear Mr. McGuire:

UPDATED F AREA DRILL PLAN REVISION

The purpose of this letter is to provide an updated response to the Department of Energy – Savannah River (DOE-SR) deliverable listed in Action 3-3 of the approved DOE Implementation Plan for Defense Nuclear Facility Safety Board (DNFSB) Recommendation 2012-1. This revised document incorporates final DOE comments.

Please feel free to contact me or Dewitt Beeler, 2-4372, of my staff if you need additional information.

Sincerely,



Paul D. Hunt, Senior Vice President
Environmental Management Operations

db/cc

Att.

c: J. J. Hynes, DOE-SR, 703-H
W. C. Dennis, 730-2B
J. N. Lovett, 730-B
C. N. Smith, 730-B
M. A. Mikolanic, 730-B
V. B. Wheeler, 703-H
L. M. Quarles, 703-H
J. D. Kekacs, 703-H
D. J. Dearolph, NNSA-SRSO, 246-H
T. P. Fischer, 246-H
K. T. Hall, 246-H
W. D. Clark, Jr., 706-8F
S. C. Shaw, 706-8F
C. S. Brizes, 706-5F
D. A. Wilson, SRNS, 730-1B
J. F. Dohse, 730-1B
J. W. Temple, 730-1B
L. C. Clevinger, 730-1B
S. J. Howell, 703-H
D. L. Beeler, 707-7F
W. R. Tadlock, 707-F
D. P. Drake, 707-F
H. E. Bilson, 730-1B
J. M. Clark, 730-4B
J. W. Rumley, 707-7F
Records Administration, 773-52A
DOE ECATS, 730-B

March 28, 2013

Building 235-F Drill Plan

Defense Nuclear Facilities Safety Board Recommendation
2012-1, Action 3-3


Approved by:

William R. Tadlock, F-Area Complex Facility Manager

Date

Willie T. Davis, Jr., Waste Solidification Building

Date



Kelly D. Trice, MOX Services

2 Apr 13
Date



Brenda L. Green, Tank Farm/ETP Operations Facility Manager

3/28/2013
Date



Melanie M. Lepard, Manager, Emergency Management

4/1/2013
Date



Donald R. Ludwick, Manager, Emergency Services

4/1/2013
Date

March 28, 2013

Building 235-F Drill Plan

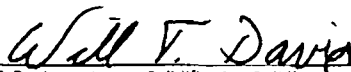
Defense Nuclear Facilities Safety Board Recommendation
2012-1, Action 3-3

Approved by:



William R. Tadlock, F Area Complex Facility Manager

4/1/13
Date



Willie T. Davis, Jr., Waste Solidification Building

4/1/13
Date



Kelly D. Trice, MOX Services

2 Apr 13
Date

Brenda L. Green, Tank Farm/ETP Operations Facility Manager

Date

Melanie M. Lepard, Manager, Emergency Management

Date

Donald R. Ludwick, Manager, Emergency Services

Date

Contents

Purpose	1
Drill Participation	1
May 15, 2013 Drill	1
F-Area Complex.....	1
WSB	2
F-Tank Farm	2
MOX	2
June 12, 2013 Drill.....	3
F-Area Complex.....	3
WSB	4
F-Tank Farm	4
MOX	4

Purpose

The purpose of the Building 235-F Drill Plan is to develop, maintain and test the capability of the F-Area Emergency Response Organization (ERO) to respond to an emergency in Building 235-F that affects the collocated workers in facilities, construction sites, and trailers located within the F-Area boundary.

This plan will be updated at the end of each Calendar Year. Revisions will include the coming year's drill schedule, training activities, and lessons learned as appropriate.

The plan follows the guidelines contained in DOE O 151.1C, *Comprehensive Emergency Management System*, DOE G 151.1-3, *Programmatic Elements*, Manual SCD-7, *SRS Emergency Plan*, and facility/area Emergency Plan Implementing Procedures (EPIPs).

Drill Participation

The level of participation for each facility or construction site in F-Area during the two drills based on a radiological release from Building 235-F in Calendar Year 2013 is summarized in the table below. Additional information for each drill follows the table.

Date	Type	Time	Level of Participation			
			F-Area Complex	F-Tank Farm	MOX	WSB
May 15, 2013	Coached	0800-1100	Full	None	Full**	Full
June 12, 2013*	Assessed	0800-1100	Full	Full	None	Full

* May be conducted on June 26, 2013 if facility conditions are such that the drill cannot be conducted safely and effectively on June 12.

** Assessed for MOX see description below

May 15, 2013 Drill

F-Area Complex

As the primary response facility for events originating in Building 235-F, F-Area Complex personnel will participate to the maximum extent allowed by facility operations. Facility management will ensure ERO members are provided adequate opportunity to participate in the facility drills and training to maintain and improve proficiency. Drill exemptions will be limited to the maximum extent possible to allow Players to demonstrate their response capabilities.

This drill will be used to reinforce the lessons presented and to refine response techniques. During this drill, Controllers will coach Players on the expected response actions and techniques, with a focus on identifying areas needing improvement.

WSB

WSB plans to support full participation by all WSB personnel, including contractors, sub-contractors, and construction personnel for this drill. WSB participation is limited to implementing the protective action issued by the F-Area AEC. WSB participation will be terminated once all personnel have demonstrated the ability to appropriately take protective actions.

F-Tank Farm

The F-Tank Farm maintains DOE Order 151.1C drill requirements and conducts various drills throughout the year. Prior to the establishment of this drill schedule, F-Tank Farm previously scheduled an accountability drill with Technical Support Room (TSR) play to be conducted on May 16, 2013 and plans to maintain that schedule. Additionally, the F-Tank Farm schedule includes project work to consolidate all Tank Farm Control Rooms in H-Area and closure activities for tanks. Because of the importance of this work, F-Tank Farm will not participate in this drill.

MOX

MOX Services is governed by the Nuclear Regulatory Commission (NRC) and for emergency response the Occupational Safety and Health Administration (OSHA) 29 CFR 1910/1926. MOX Services has been requested by NNSA to participate in the 235-F drill. MOX Services will participate in the May drill and use it as their assessed drill, a practice drill is not necessary. To help ensure the safety of the MOX Services workforce, especially the craft, the drill is to be conducted during the morning break time. As such, MOX Services will participate as follows:

1. MOX Services will provide Controllers for the identified facilities and responding organizations. These Controllers will be MOX Services employees who are trained in the required responses.
2. MOX Services will provide a Lead Controller who is responsible for all the MOX Controllers and who will interface with the Drill Lead Controller and SRS personnel.
3. NNSA may provide Observers on the MOX project site to observe the actions of personnel and the coordination of activities.
4. Except for the Lead Controller, MOX personnel will not directly interact with SRNS personnel or Defense Board personnel.
5. MOX Personnel in the offices and participating buildings will participate. They will remain in doors and assist the Fire Wardens with manning exterior doors if requested.
6. MOX Fire Wardens will simulate shutting down all ventilation systems in buildings 706-1F, 706-2F, 706-3F, 706-4F, 706-5F, 706-6F, and 226-2F. Fire Wardens will be stationed at all doors to preventing personnel

from exiting the buildings and to segregate any personnel entering the buildings in accordance with the MOX Services Emergency Response Manual for Construction.

7. MOX Services construction supervisors and subcontractor supervisors will perform a radio check with their respective foremen to verify that any announcements would be further provided to the craft personnel. Through random sampling, controllers will check that foreman know what building to go to with their craft for a Remain Indoors.
8. MOX Services craft will have limited participation in the drill. The craft will report to their predetermined meeting points and meet with their Foreman/Supervisor. Once accountability of all the craft has been conducted, the craft will be released back to work.
9. When all initial actions have been completed, MOX Services drill Controllers will notify the MOX Services Lead Controller who will then notify the Drill Lead Controller and then terminate all MOX Services drill activities.
10. MOX Services participation shall be limited to one hour duration.
11. MOX Services Controllers will provide all comments to the MOX Lead Controller who will in turn provide them to the Drill Lead Controller.

MOX Services will assess this drill. The assessment criteria used by SRNS will be offered to the MOX facility for their use. However, MOX may choose to develop a different assessment plan based on criteria that are separate from or in addition to those criteria used elsewhere.

MOX will develop a drill report using the assessment criteria developed by MOX. That report will be provided to NNSA-SRSO for review and dissemination.

June 12, 2013 Drill

All participating facilities for this drill will be assessed using the assessment criteria contained in the site's SCD-4 Drill Database. Controllers in each participating facility will provide their input to the F-Area Complex Lead Controller, who will include that input in the After-Action Report for this drill. Additionally, assessment information received from MOX from the May 15 drill will be included as a stand-alone attachment.

F-Area Complex

As the primary response facility for events originating in Building 235-F, F-Area Complex personnel will participate to the maximum extent allowed by facility operations. Facility management will ensure ERO members are provided adequate opportunity to participate in the facility drills and training to maintain and improve proficiency. Drill exemptions will be limited to the maximum extent possible to allow Players to demonstrate their response capabilities.

WSB

WSB plans to support full participation by all WSB personnel, including contractors, sub-contractors, and construction personnel for this drill. WSB participation is limited to implementing the protective action issued by the F-Area AEC. WSB participation will be terminated once all personnel have demonstrated the ability to appropriately take protective actions.

F-Tank Farm

All personnel in F-Tank Farm will participate in this drill. F-Tank Farm participation is limited to implementing the protective action issued by the F-Area AEC. F-Tank Farm participation may be terminated once all personnel have demonstrated the ability to appropriately take protective actions.

MOX

MOX personnel will not participate in this drill to any extent. Their assessed drill is May 15, 2013.