

---

# **DNFSB 2002-3 Implementation at BWXT Y-12**

**Bruce Wilson  
Chief Engineer  
Facility Safety**



# Issue 1

---

- SACs for Building 9212 had not been implemented.
- Response: Implementation of the 10CFR830 compliant DSA/TSR was completed on July 20, 2007. IVR was performed to verify implementation of the Safety Basis documents as well as all 28 SACs.



## Issue 2

---

- None of the SACs required independent verification by a second qualified operator.
- Response: Independent verification is one of several tools the standard talks to that could be used. BWXT believes we are using applicable SAC attributes and verification is achieved using methods other than independent verification (e.g. maintaining a running total and comparing this against inventory).



## Issue 3

---

- TSR and implementing procedure for at least one SAC contained an insufficient level of detail for the operator to adequately satisfy the intent of the control.
- Response: FHA was revised to be more specific; that data was used to upgrade SAC surveillance guidance sheet used by operator. Extent of condition was evaluated with all other applicable SACs.



## Issue 4

---

- BWXT Y-12 has a unique category of SACs for non-nuclear applications (safety significant non-nuclear)
- Response: BWXT letter dated 10/18/07 to YSO proposed elimination of SSnn. Once S/RID is revised, designations will be removed with subsequent annual updates.



# Issue 5

---

- BWXT Y-12 had not adequately considered the safety classification of a critical system necessary to support one of the SACs as SS.
- Response:
  - Process monitors, alarms, and circuitry relied on by the operator must be designated SS per YSO SER.
  - Compensatory measures were addressed and included in a standing order.
  - Design Adequacy Analysis to be performed on SSC.

