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K-65 DECANT SUMP TANK REMOVAL ACTIONS RISK MANAGEMENT PLAN MARCH 1991

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K-65 DECANT SUMP TANK REMOVAL ACTION

RISK MANAGEMENT PLAN

BY

Operable Unit No. 4

MARCH 1991

Approved by: _____

Concurrence: _____ for JL Click

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K-65 DECANT SUMP TANK REMOVAL ACTION

RISK MANAGEMENT PLAN

I. Introduction

This Risk Management Plan (herein referred to as the "Plan") is intended to describe the specific actions and responsibilities to mitigate or eliminate the consequences of failure or concerns identified in the Risk Assessment Report, titled "K-65 Decant Sump Tank Removal Action"; dated March 19, 1991 and approved for this project.

II. Summary

The K-65 Decant Sump Tank Removal Action effort involves one potential failure or concern which merits special management attention due to the severity of its consequence. This consequence can be managed, minimized or eliminated by close adherence to the risk control measures identified. Specific control measures directed by management and implemented by pertinent personnel provide the effective risk control required. This Plan specifies the controls for the management of risks associated with this effort.

III. Risks Requiring Inclusion in the Plan

The Risk Assessment Report (RAR) identifies one possible failure or concern (risks) associated with the K-65 Decant Sump Tank Removal Action effort. This risk is identified as Quality Level 2 and is described below.

Quality Level 2

The overflow of the Transport Tanker during the filling operation. The failure of the level indicator to function. (RAR item 2).

IV. Description of Control Measures and Requirements

General Risk Control Measures

1. Specific Operating Instructions and Procedures

All K-65 Decant Sump Tank Removal Action operations shall be accomplished in accordance with the following written instructions for the effort.

- K-65 Decant Sump Tank Removal Action Site Specific Health and Safety Plan, December 1990.
- K-65 Decant Sump Tank Removal Action Work Plan, December 1990.
- The Operational Work Plan, March 1991.
- The System Operability Test Plan, March 1991.
- K-65 Silo Numbers 1 & 2 Area Emergencies, SOP 65-C-201.
- Radon Treatment System Emergencies, SOP 66-C-909.
- FMPC Underground Storage Tank Content Removal, CIO No. C90-063. (Inactive - For Reference Only).
- K-65 Clear Liquor, Specification No. 3B-603.16. (Inactive - For Reference Only).
- FMPC-511. Control of Entry to the Waste Storage Area.
- FMPC-515. Issuance and Implementation of Radiation Work Permits.
- FMPC-704. Minor Event Report System.
- FMPC-718. Measuring and Test Equipment Calibration and Control.
- FMPC Spill Contingency Plan.

2. The Work Plans and Procedures detail the normal activities expected during the K-65 Decant Sump Tank Removal Action. The procedures provide instructions and details to address the potential failures or concerns identified.

<u>Risk Addressment</u>

Specific activities which address the identified risk (as listed in Section III) are as detailed below.

1. Performance of the System Operability Test Plan.
2. PQA Inspection.
3. Operators' Training in the System Operability Test Plan, the Operational Work Plan, the

Site Specific Health and Safety Plan, K-65 Silo Numbers 1 & 2 Area Emergencies or Radon Treatment System Emergencies.

4. Follow the Site Specific Health and Safety Plan, Section No. 11, and the FMPC Spill Contingency Plan.

V. Training

Training on the specifics of the Decant Sump Tank Removal Action fully supports the written procedures and work plans. All supervisors, operators, support engineers, radiological technicians, Emergency Response Team and Safety & Fire personnel have received training pertinent to their roles in the Decant Sump Removal Action.

FMPC
RISK ASSESSMENT REPORT

TITLE: K-65 DECANT SUMP TANK REMOVAL ACTION
WBS NO.: 1.2.01.04.02.02 DATE: 3/20/91
LOCATION: PLANTS 2/3 AND 8 REVISION NO.: 1

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RISK ASSESSMENT REPORT NUMBER

RISK MANAGEMENT PLAN NUMBER TO BE ASSIGNED

DEPT	SECTION	SEQ

POSSIBLE FAILURE/CONCERN	SERIOUSNESS CODE	SERIOUSNESS RATIONALE	POSSIBLE CAUSE OF FAILURE/CONCERN	EFFECT OF FAILURE/CONCERN	NORMAL STANDARDS OR PROCEDURES TO ELIMINATE OR MINIMIZE A FAILURE/CONCERN	PROBABILITY CODE	QUALITY LEVEL
5. SYSTEM VALVES OR CONNECTIONS LEAK.	2	CLEAN UP COSTS. REPAIR/REPLACE WELDS/PIPING. DELAY < 1 MONTH - LOW	FAULTY CONNECTIONS OR FAULTY VALVE MANUFACTURING.	MINIMAL LOCALIZED CONTAMINATION. CHANGE VALVES OR CONNECTIONS.	1) ALL WELDERS ARE CERTIFIED. 2) P.Q.A. INSPECTION. 3) PERFORMANCE OF SYSTEM OPERABILITY TEST. 4) FOLLOW SITE SPECIFIC HEALTH & SAFETY PLAN. 5) FOLLOW FMPC SPILL CONTROL CONTINGENCY PLAN.	4	4
6. RUBBER HOSES FOR LOADING AND UNLOADING LEAKS.	2	CLEAN UP COSTS. REPAIR/REPLACE WELDS/PIPING. DELAY < 1 MONTH - LOW	FAULTY HOSE MANUFACTURING.	MINIMAL LOCALIZED CONTAMINATION. REPLACE OR REPAIR HOSE.	1) P.Q.A. INSPECTION. 2) PERFORMANCE OF SYSTEM OPERABILITY TEST. 3) FOLLOW SITE SPECIFIC HEALTH & SAFETY PLAN. 4) FOLLOW FMPC SPILL CONTROL CONTINGENCY PLAN.	4	4

PREPARER	FACILITY OWNER	OPERATIONS SAFETY AND HEALTH	QUALITY ASSURANCE	APPROVAL
S.A. Radebaugh 3-20-91	[signature] 3/20/91	[signature] for JL Click 3/20/91	[signature]	[signature]

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POSSIBLE FAILURE/CONCERN	SERIOUSNESS CODE	SERIOUSNESS RATIONALE	POSSIBLE CAUSE OF FAILURE/CONCERN	EFFECT OF FAILURE/CONCERN	NORMAL STANDARDS OR PROCEDURES TO ELIMINATE OR MINIMIZE A FAILURE/CONCERN	PROBABILITY CODE	QUALITY LEVEL
1. RUPTURE OF TRANSPORT TANKER CAUSED BY AN ACCIDENT.	4	ADVERSE PUBLIC OPINION - HIGH INJURY - MODERATE POTENTIAL $ LOSS - NEGLIGIBLE PRODUCTION DELAY - NEGLIGIBLE ENVIRONMENTAL IMPACT	OVERTURNING OF THE TANKER. TANKER HIT BY ANOTHER VEHICLE, ETC..	CONTAMINATION OF IMMEDIATE AREA. ADVERSE PUBLIC REACTION.	1) MUST HAVE DRIVER AWARENESS AND ESCORT. 2) FOLLOW SITE SPECIFIC HEALTH & SAFETY PLAN SECTION 11.0 AND FMPC SPILL CONTROL CONTINGENCY PLAN.	2	4
2. OVERFLOW OF TANKER DURING FILLING OPERATION. FAILURE OF LEVEL INDICATOR TO FUNCTION.	4	ADVERSE PUBLIC OPINION - HIGH INJURY - LOW $ LOSS - LOW PRODUCTION DELAY - NEGLIGIBLE	OPERATORS' FAILURE TO WATCH LEVEL INDICATOR. FAILURE OF INDICATOR.	CONTAMINATION OF IMMEDIATE AREA. ADVERSE PUBLIC REACTION.	1) PERFORMANCE OF SYSTEM OPERABILITY TEST. 2) P.Q.A. INSPECTION. 3) OPERATOR TRAINING. 4) FOLLOW SITE SPECIFIC HEALTH & SAFETY PLAN AND FMPC SPILL CONTROL CONTINGENCY.	4	2
3. STAINLESS STEEL PIPE FAILURE ON TRANSPORT TANKER OR STORAGE TANKS.	2	WNCO RESPONSE - LOW COST TO REPAIR/REPLACE - LOW COST TO CLEAN UP - LOW	FAULTY PIPE MANUFACTURING.	MINIMUM LOCALIZED CONTAMINATION. REPAIR/REPLACE PIPING.	1) PERFORMANCE OF SYSTEM OPERABILITY TEST. 2) P.Q.A. INSPECTION. 3) FOLLOW SITE SPECIFIC HEALTH & SAFETY PLAN AND FMPC SPILL CONTROL CONTINGENCY. 4) STORAGE TANKS ARE IN A CONTAINMENT AREA.	3	4
4. FAILURE OF PIPING WELDS.	2	CLEAN UP COSTS. REPAIR/REPLACE WELDS/PIPING. DELAY < 1 MONTH - LOW	POOR OR INCOMPLETE WELDING.	MINIMAL LOCALIZED CONTAMINATION. RE-WELD.	1) ALL WELDERS ARE CERTIFIED. 2) P.Q.A. INSPECTION. 3) PERFORMANCE OF SYSTEM OPERABILITY TEST. 4) FOLLOW SITE SPECIFIC HEALTH & SAFETY PLAN. 5) FOLLOW FMPC SPILL CONTROL CONTINGENCY PLAN.	4	4

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