N-2012-06404
Event Title: Difficulty in Arranging Walkdown
Discovery Date: 14DEC2012
Date Occurred: 14DEC2012
Time: 12:00
Location: GM Building
Condition Description and How Discovered: To progress tasks for Refurbishment, a walkdown was arranged for Friday, December 14 of the MCR while B Crew would be on shift. This walkdown was selected for this date because of familiarity with the crew and the CRSS. Notification was given to the vendor company on Monday, December 10 with a basic description of the walkdown provided. Along with completing the vendor version of a pre-job brief (an FLRA), a pre-job brief checklist and expectations sheet titled "Pre-Job Brief/ Post-Job Review and General Expectations" prepared by the vendor to cover OPG's minimum vendor supervisor pre-job brief expectations was provided for completion. This document requires completion two days in advance of walkdown, in order to be forwarded to the OSS Contract Administrator, CMO Site Contact and the Project Manager one day in advance of the walkdown. OPG's requirements for vendors performing walkdowns were then updated on Tuesday, December 11 adding some additional requirements. OPG's requirements for vendors performing walkdowns have been under development by the OSS Contract Management team working with Conventional Safety.

While completing the forms, there was some uncertainty on how the forms should be completed, as well as the level of detail required. For example, at one point the vendor requested that the walkdown attendees add additional hazards to the form. These forms should not contain unnecessary information just to satisfy the appearance of completeness; the purpose of these forms was to document the actual hazards present on the PPE exempt walkway up to the MCR and back for this walkdown. Another area of concern was the escort requirements, as it was not immediately obvious that all participants had an Orange 1 qualification. As well, the completion of the PJB according to the forms, did not clearly show the vendor supervisor that provided the PJB to the walkdown participants nor was a PJB provided in a timely manner. Three members of the vendor team, along with the walkdown attendees were involved with the completion of the forms. Multiple follow-up emails were sent to address the concerns of the multiple parties (the vendor team and the CMO Site Contact) reviewing the forms. Project manager email notification was also incorrectly sent to the wrong project manager, adding further confusion.

When it began to appear that confirmation of acceptance of all the forms could not be attained the day prior to the walkdown, it became necessary to escalate the priority of completing the forms. The next weekday-day-shift that B Crew would be on shift (that was not a statutory holiday) would be 8JAN2013, so it was important to ensure the walkdown took place as originally planned. To expedite the completion of the forms, face-to-face communication was sought after, however the site rep was unavailable for consultation this morning. A number of individuals were involved and contacted while completing the forms and obtaining approval for the walkdown, requiring an unnecessary amount of time being spent on paperwork and discussion. A simple email turned into a lengthier checklist and

process that actually turned out to be quite cumbersome and required a great deal of resources to meet the perceived requirements.

Through completing all of these steps, the question of TLDs was raised. Although all individuals attending the walkdown were Orange 1 qualified, not all individuals had TLDs assigned to them at Darlington. An email was sent to Rad Data however the response did not contain the information actually being sought after. Multiple phone calls were placed to Rad Data for clarification but there was no answer. After discussing the matter with OPG staff, it was determined that even though it was the day before the scheduled walkdown, it was probable that a TLD could be obtained the day of the walkdown by completing N-FORM-10019 and that the walkdown should be pursued.

While completing N-FORM-10019, it was unclear who should sign for the OPG Supervisor/ Sponsor per Part B of the form. It appears this space has been completed inconsistently throughout Refurb. According to N-PROC-RA-0010, a facility sponsor must sign, which according the definitions at the end of the document, must be a person whose primary work location is at the Nuclear facility. When the CMO Site Contact was called regarding this, initial feedback was given to have the Refurb SM sign, however upon further discussion regarding the requirements of N-PROC-RA-0010, the CMO Site Contact agreed to sign the form as the facility sponsor since the Refurb SM could not sign under this definition. Once the forms were submitted to Rad Data, notification was given that it would take 24 hours to process the TLDs and obtain a Darlington DISN. Visitor TLDs could be provided, however since these badges would be considered “Red” an escort would be required. The CMO Site Contact agreed to escort to ensure the walkdown still took place.

The walkdown took place on Friday, December 14 and a number of lessons learned were obtained. This walkdown involved Orange 1 qualified staff in an area where no conventional or radiological hazards were expected yet required a great deal of coordination. The lessons learned from this walkdown need to be incorporated to streamline the process further such that the increased number of vendor walkdowns to occur and short notice vendor walkdowns can be coordinated.

Immediate Action Taken: Acknowledgement that the process was recently developed and could be further improved was made by both OPG and Vendor staff. A lessons learned meeting was tentatively scheduled for 7JAN2013 to discuss this.
It should be noted that a new N-INS has been prepared, N-INS-09701-10006 and clarifies the requirements for Site contracts for Refurbishment Project when Managed Task Personnel are Accessing Darlington Nuclear Generating Station. Its roll-out will help reduce confusion over roles and accountabilities.

Recommended Actions: 1. Review current process requirements and streamline where possible. 2. Reinforce expectations for the role of Vendor Supervisor with respect to PJBs and completion of any associated forms to reduce the number of parties involved in the process 3. Provide instructions to vendors on governance protocol for arranging TLDs to reduce confusion on OPG’s process. 4. Roll-out N-INS-09701-10006 to affected staff.