



the CPF for flammable material contents and to provide the information to the Storage Operations Organization. This information is provided by GS to Storage Operations through an Empty Container Prescreening Worksheet. An Empty Container Prescreening Worksheet was initiated by GS Operations personnel and issued to Storage Operations personnel prior to movement of the containers. GS personnel completed the section of the worksheet that conveyed information to Storage Operations needed for disposition of the empty drums. This section of the worksheet designates if fire protection (FP) monitoring is required for each container, special conditions (flammable, PCB, etc.), and results from LEL measurements of internal vapors when fire protection monitoring is required. The containers related to this event were listed on the worksheet as flammable liquid not requiring FP monitoring (this was an error, FP monitoring was required). Because the worksheet required no fire protection monitoring, Waste Storage Operations transported the empty drums to the CPF. The requirement for FP monitoring was marked "NO" by GS because the individual who initiated the worksheet did not fully understand this task. This person believed the abbreviation for fire protection "FP" monitoring stood for flash point. Training for the procedure had not been provided to GS personnel because it was considered a Storage Operations procedure. Storage Operations personnel had been trained to the procedure. Due to this lack of training, GS personnel were unaware of the requirement for LEL monitoring or the requirement for no containers previously containing flammable materials to be staged at CPF.

During the investigation of this incident, the need for a documented process for disposition of empty containers previously containing flammable materials was identified. In response to this need, work instruction(s)/procedure(s) will be implemented that describe requirements for the disposition of empty containers that previously contained flammable materials.

#### **RESOLUTION/RECOMMENDED ACTIONS:**

- Ensure a review of all waste disposition and waste storage procedures to identify tasks performed in support of the primary process described in the procedure.
- Develop training and provide to personnel who perform support tasks.
- Establish an area for the disposition of empty drums previously containing flammable materials.
- Ensure procedure(s) is implemented for the disposition of empty containers that previously contained flammable materials.

ORIGINATOR: Bechtel Jacobs Company, LLC: E. J. Lavender, (423) 576-4620 Performance/Quality Assurance

VALIDATOR: Brad A McKeehan, (423) 241-5077

CONTACT: Joanne E. Schutt, (423) 574-1248

NAME OF AUTHORIZED DERIVATIVE CLASSIFIER: Jeffrey S. Paris

NAME OF REVIEWING OFFICIAL: D. D. Holt

PRIORITY DESCRIPTOR: Blue/Information

KEYWORDS: RCRA, ASA, Auditable Safety Analysis, drums, flammable material, vapors

REFERENCES: ORO--BJC-K25WASTMAN-1998-0006; Critique Summary CR-98-029, "Violation of ASA at K-1423 Container Processing Facility

DOE FUNCTIONAL CATEGORIES: Environmental Restoration and Waste Management,

Training and Qualification

BJC FUNCTIONAL CATEGORIES: WM - Waste Management, TQ - Training and Qualification

HAZARDS: Hazardous Material

WORK ACTIVITY: Material Storage

**FOLLOW-UP ACTION:** Information in this report is accurate to the best of our knowledge. As means of measuring the effectiveness of this report please notify Joanne E. Schutt at (423)574-1248, e-mail at [s6u@ornl.gov](mailto:s6u@ornl.gov) of any action taken as a result of this report or of any technical inaccuracies you find. Your feedback is important and appreciated.