



## Department of Energy

Washington, DC 20585

April 1, 2002

Dr. Fred Tarantino

[ ]

Bechtel Nevada

P.O. Box 98521

Las Vegas, NV 89193-8521

Subject: Enforcement Letter

Dear Dr. Tarantino:

This letter refers to the Department of Energy's (DOE) evaluation of Bechtel Nevada's (BN) report of noncompliances with the occupational radiation protection and quality assurance provisions of DOE's nuclear safety requirements occurring at the Nevada Test Site Reactor-Maintenance, Assembly and Disassembly (R-MAD) facility. The issues involved several failures to follow BN's established work controls and resulted in the uncontrolled breach of a posted radiological area boundary for a hot cell undergoing decommissioning. This was reported by your staff into the Noncompliance Tracking System (NTS) (NTS-NVOO--BNOO-NTS-2002-0001) on January 18, 2002.

On November 15, 2001, two BN employees at the direction of a supervisor were observed replacing plywood covers with plexiglass over two hot cell window openings. This work was conducted without adequate approvals, work controls or radiological monitoring. The plywood covers had been clearly posted with a sign and tape indicating internal radiological contamination. The BN employees were Radiological Worker trained and were aware of their responsibilities to adhere to posted requirements; however, the employees did not stop work when they encountered the postings nor did they get approval from a Radiological Control Technician (RCT) to move the radiological postings. Although the work to replace the plywood covers had been directed by a supervisor, the task had not been included in required Plan of the Day briefings and was not within the scope of the approved work package. Further, radiological control personnel and the site safety representative had not reviewed or approved this work as required and were unaware that the work was being done. An RCT fortuitously observed the employees replacing the plywood, and upon discovery, took immediate action to stop the work, secure the area and perform radiological surveys. The breach of the posted radiological boundary did not result in the spread of contamination.

DOE has concluded that potential violations of 10 CFR 830 (Nuclear Safety Management) and 10 CFR 835 (Occupational Radiation Protection) did occur in association with this event. However, DOE acknowledges that once identified, immediate action was taken to stop the work and place the area in a safe configuration.

BN has performed a root cause analysis and identified corrective actions to prevent recurrence. Based on the identified actions, DOE has decided to issue this enforcement letter in lieu of initiating additional enforcement measures. DOE, in conjunction with the DOE-Nevada Operations Office, will continue to monitor completion of the corrective actions.

No response to this letter is required. Should you have any questions concerning this letter, please contact Susan Adamovitz of my staff at 301-903-0125.

Sincerely,



R. Keith Christopher  
Director  
Office of Price-Anderson Enforcement

cc: B. Cook, EH-1  
M. Zacchero, EH-1  
J. Mangeno, NNSA  
R. Crowe, NNSA  
D. Minnema, NNSA  
E. Beckner, NA-10  
J. Roberson, EM-1  
H. Himpler, EM-5  
E. Chittwood, EM-5  
K. Carlson, DOE-NV  
K. Hoar, NNSA-NVOO PAAA Coordinator  
D. Wheeler, DOE-NV PAAA Coordinator  
R. Saval, BN Contractor PAAA Coordinator  
D. Starrett, BN Contractor PAAA Coordinator  
S. Adamovitz, OE  
Docket Clerk, OE