

August 22, 1996

Mr. Michael T. Sullivan
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EG&G Mound Applied Technologies
P.O. Box 3000
Miamisburg, OH 45343-3000

Re: Noncompliance Number NTS-OH-MB-EGGM-EGGMAT01-1996-0001

Dear Mr. Sullivan:

On April 17, 1996, the Office of Enforcement and Investigation conducted an onsite evaluation of the referenced potential noncompliance reported to Department of Energy (DOE) by EG&G Mound (EG&G) in the Noncompliance Tracking System (NTS). This potential noncompliance, which occurred on January 11, 1996, and was reported on January 24, 1996, involved the inadvertent transfer of contamination, resulting in low level contamination of individuals, equipment and locations outside designated radiological areas.

The April 17, 1996, site visit evaluated the adequacy of and progress toward completion of corrective actions related to the January 11 event. We also reviewed your Contamination Control Review Team investigation report which addressed the January event and several contamination events that occurred in 1995 as well as planned corrective actions. Based on this review, it was determined that EG&G had performed a comprehensive root cause analysis of the potential noncompliance including the collective significance of this and other recent contamination events. The review also found that the contractor has made substantial progress in implementing comprehensive contamination control corrective actions. Additionally, this analysis identified certain issues that are being addressed regarding strategies for improving contamination control discipline, the laboratory turnover system, radiation worker training programs, and the identification of nuclear facilities.

Based upon the information provided in your letter dated July 8, 1996, to the Office of Enforcement and Investigation, and in a follow-up meeting with the enforcement staff on July 17, 1996, DOE has concluded that EG&G has promptly completed the remaining corrective actions to resolve inadequacies in site-wide contamination control practices. We note that since the January 1996 incident, the site has not experienced a single personnel contamination, clothing contamination or loss of contamination control even compared to multiple events in the months prior to implementation of corrective actions.

The issues involved, in resolution of the specific noncompliance, have reflected a proactive and responsive contractor self-identification and reporting initiatives as well as timely and effective corrective actions.

Accordingly, DOE, consistent with its enforcement policy set forth in 10 CFR 820, Appendix A, has elected to exercise enforcement discretion in this matter and not to take formal enforcement action.

Enforcement staff, in coordination with DOE Ohio Field Office and DOE Mound Site Office personnel, will continue to review performance of the radiological control program and any future noncompliances. We will also continue to follow the compliance assessment and surveillance improvements that are being implemented for the quality assurance program at EG&G Mound.

If you have any further questions on these matters, please contact Howard Wilchins of my staff at (301) 903-0107.

Sincerely,

R. Keith Christopher
Director
Office of Enforcement and
Investigation