

July 6, 1995

NTS No. NTS-RL--WHC-PUREX-1995-0001

Westinghouse Hanford Corporation
ATTN: Mr. Ronald J. Bliss
[]
P.O. Box 1970
MSIN: B3-04
Richland, WA 99350

Subject: Noncompliance with 10 CFR 830.120 (Quality Assurance Requirements) at the
Plutonium Uranium Extraction Facility

Gentlemen:

This letter refers to the Department of Energy's (DOE) evaluation of Westinghouse Hanford Company's (WHC) investigation of an event that occurred between February 22-March 7, 1995, at the Plutonium Uranium Extraction Facility (PUREX) at DOE's Hanford site. The event, which involved the cutting of a highly contaminated canyon exhaust air sampling probe as part of waste disposal activities without adequate management controls, resulted in your decision to temporarily curtail waste cutting activities. Based on your investigation of the event, you identified and reported to DOE on April 12, 1995, a potential noncompliance with the Work Process requirements of 10 CFR Part 830.120 (Quality Assurance Requirements). On June 8, 1995, a conference was held with you and members of your staff to discuss the facts and circumstances surrounding the potential noncompliance, its safety significance, and the status of corrective actions taken or planned to resolve the problem. A summary conference report is enclosed.

The noncompliance identified by WHC occurred during an evolution in which operators, while cutting the air sampling probe in half inside a glove bag, were unaware of and therefore did not adhere to a radiological hold point in the work control package. The radiological hold point had been deemed necessary to certify the glove bag and to generate a special Radiation Work Permit (RWP) for cutting the probe since the exact radiological conditions could not be known until the probe was removed.

WHC's investigation determined that a number of management breakdowns in the control of the work occurred during this event. For example, the special RWP was never developed and the workers were never made aware of the exact contamination or radiation levels involved in the work. Additionally, there was no Health Physics coverage involved in the necessary stages of the work which would have prevented a number of the identified breakdowns; and, Waste Operations Management, which is responsible for the waste disposal work, was never involved in planning or preparing the original work packages. As a result, when the glove bag was inadvertently cut during the evolution, localized, but significant contamination [] occurred in the area of the cut. However, the potential for airborne contamination resulting from the cut was not identified until the following day.

DOE recognizes that in analyzing, identifying and reporting to DOE potential noncompliances with nuclear safety requirements promulgated pursuant to the enforcement provision of the Price-Anderson Amendments Act of 1988, WHC is entering into a new and unfamiliar arena. The single most important goal of DOE's nuclear safety enforcement program is the early identification, reporting and correction of nuclear safety deficiencies by DOE's contractors before there is an adverse impact on public and worker safety. In this regard, DOE commends WHC in its willingness to embrace this concept in its approach to resolving nuclear safety issues.

DOE is concerned, however, that adequate job planning, preparation and radiological controls over the performance of this work was not implemented. Additionally, while your proposed corrective actions appear appropriate, recent similar problems associated with work control in the PUREX facility indicate that more emphasis needs to be placed on work control in general at the facility level. For example, DOE is particularly concerned with the apparent degraded working relationship between Operations and the Health Physics management and personnel. This issue has resulted in a continuing problem in planning and integration of work activities both at PUREX and certain other facilities. WHC needs to define what actions are being taken at PUREX and on a site-wide basis.

While a Notice of Violation could be issued at this time, DOE believes that the better course is to defer a decision on whether to issue a Notice of Violation for a period of 60 days. During this time, you will have the opportunity to fully implement your corrective action plan to prevent recurrence and show substantial progress in areas which could warrant more than 60 days. If the corrective actions are fully implemented, it is DOE's plan to exercise enforcement discretion and not issue a Notice of Violation. If, however, the corrective actions are not adequately implemented and effective, DOE will then consider the full range of enforcement options available to it, including the issuance of a Notice of Violation.

WHC should provide an outline of its corrective action plan to resolve the root causes of this event to Mr. James Mecca, [], by a mutually agreed upon date and in 60 days, provide a status of the implementation of corrective actions for DOE review. WHC should meet with representatives of your DOE Operations Office as appropriate to discuss the status and progress of your corrective actions. Please provide copies of any additional documents or correspondence developed with respect to your discussions with the DOE Operations staff to the Director, Enforcement and Investigation Staff, for inclusion in the Docket File.

Sincerely,

R. Keith Christopher
Director
Office of Enforcement and
Investigation

Enclosure:
Conference Summary Report