

May 5, 2004

Dr. Leonard K. Peters, []
Batelle Memorial Institute
Pacific Northwest Division
P.O. Box 999
902 Battelle Blvd.
Richland, WA 99352

Subject: Pacific Northwest National Laboratory Enforcement Letter

Dear Dr. Peters:

The Office of Price-Anderson Enforcement (OE) has conducted a preliminary evaluation of the deficiencies described in Noncompliance Tracking System (NTS) report NTS-RL--PNNL-PNNLNUCL-2003-0004. Our evaluation included review of the causal analysis, corrective actions, additional supporting information, and discussion with Department of Energy Richland Operations Office (RL) personnel.

The subject NTS report described multiple deficiencies identified through a DOE-RL assessment of contamination control and survey practices associated with fume hood work at the PNNL Radiochemical Processing Laboratory. The DOE-RL assessment was formally transmitted to PNNL on November 10, 2003. Specific deficiencies identified as part of the DOE assessment included multiple instances of workers failing to perform required contamination self-surveys, workers performing incomplete or cursory self-surveys, and workers failing to perform or performing incomplete qualitative surveys of the work area after work completion. The assessment also identified deficiencies in general radiological work practices and the radiological training provided to support work in fume hoods.

PNNL subsequently performed an extent of condition review that identified similar radiological survey practice deficiencies in other facilities at PNNL. Your NTS report also acknowledged that although similar deficiencies had been identified through prior PNNL assessments, your self-assessment program had not adequately identified the scope and extent of the breakdown in radiological controls associated with fume hood work.

OE has concluded that violations of 10 CFR 830.122 and 10 CFR 835 may have occurred associated with the deficiencies identified in the DOE-RL assessment. OE is concerned that you were prompted to recognize and address the scope of these deficiencies only through an external assessment, rather than through the implementation of your own self-assessment program. It is encouraging, however, that your subsequent extent of condition review assisted in identifying the sitewide nature of the deficiencies. In addition, your corrective actions appear broad and, once fully

implemented, should facilitate improvement in a number of areas, including training, procedures, and assessments.

In recognition of the relatively limited safety significance of the deficiencies and the scope of your corrective actions, OE has determined that no formal enforcement action will be initiated by our office at this time. We will continue working with DOE-RL to monitor your performance in this area, as well as your completion of the identified corrective actions.

No response to this letter is required. Should you have any questions, please contact me at (301) 903-0100 or have your staff contact Tony Weadock at (301) 903-4283.

Sincerely,

Stephen M. Sohinki
Director
Office of Price-Anderson Enforcement

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