

Department of Energy

Washington, DC 20858

August 29, 2002

Dr. D. B. Shipp

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Bechtel BWXT Idaho, L.L.C.
2525 Freemont Avenue
Idaho Falls, Idaho 83415

Subject: RWMC Enforcement Letter (NTS-ID--BBWI-RWMC-2002-0002)

Dear Dr. Shipp:

During July 16-17, 2002, personnel from the DOE Office of Price-Anderson Enforcement (OE) conducted an onsite investigation at the Radioactive Waste Management Complex (RWMC) of multiple events occurring during 2001-2002. The events all involved transuranic (TRU) waste characterization, handling, and shipping activities. The investigation included a detailed review of the March 2002 event in which an incorrect payload of TRU waste drums was shipped to the Waste Isolation Pilot Plant (WIPP). OE also reviewed an additional seven similar events occurring in the year prior to the incorrect payload event. The enclosed report summarizes the scope and findings of the investigation.

The OE review identified multiple instances of procedural noncompliance and/or procedural inadequacies. As an example, during the March 2002 event an intended payload position change was not implemented due to poor communication and use of a mechanism (pen and ink change to payload assembly form) not authorized by contractor procedures. Inadequate verifications of the assembled payloads were performed, due in part to lack of specificity in the procedures. Further, a TRU drum subject to an open Nonconformance Report (NCR) was included in the shipment, due to the failure to adequately tag and control the TRU drum or payload as required by procedures.

Similar deficiencies in procedural adequacy or compliance were reflected in the events occurring during 2001. Bechtel BWXT Idaho (BBWI) has acknowledged problems in this area, and in 2000 it reported a programmatic deficiency in the area of procedural compliance on the Noncompliance Tracking System (NTS). Subsequent corrective actions were not effective in preventing recurrence.

Based on the subject investigation, DOE has concluded that violations of the *Work Processes and Quality Improvement* requirements of 10 CFR 830, "*Nuclear Safety Management*," did occur. DOE's review of the specific noncompliances, however, determined them to be of low safety significance. DOE also noted that BBWI had recognized its continuing concerns in procedural compliance through the

performance of an NTS report closure verification assessment performed in June 2001. Additional corrective actions were developed at that time, including a significant overhaul of the RWMC operating procedures. BBWI's corrective actions in response to the March 2002 event were found to be timely and comprehensive. Contractor and DOE-Idaho assessments performed subsequent to the March event have indicated improved performance.

In light of the above considerations OE has determined, based on the particular factual circumstances described in the enclosed report, to utilize enforcement discretion and conclude its investigation with the issuance of this Enforcement Letter. OE, in conjunction with the DOE-Idaho Operations Office, will continue to monitor RWMC completion of corrective actions and overall nuclear safety performance.

No response to this letter is necessary. Please contact Tony Weadock at (301) 903-4283 if you have any questions about this matter.

Sincerely,



Howard M. Wilchins

for

Stephen M. Sohinki

Director

Office of Price-Anderson Enforcement

Enclosure: Investigation Summary Report

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