



Department of Energy

Washington, DC 20585

December 22, 2004

Mr. John G. Lehew, []
CH2M Hill Mound, Inc
1 Mound Road
P.O. Box 3030
Miamisburg, OH 45343-3030

Subject: Enforcement Letter-Spread of Contamination during Group 9 Waste Line
Remediation

Dear Mr. Lehew:

My office has completed an evaluation of the facts and circumstances relating to the contamination event reported in the above subject. On Tuesday, July 27, 2004, several employees working in the soil contamination area (SCA) were unnecessarily contaminated with radioactive material as they traversed the SCA. The employees were assisting in the removal of a concrete encased underground radioactive material waste line.

Documentation for the removal of prior sections of the waste line in potential release site [no.] indicated that removable radioactive contamination was minimal. The section of pipe being removed during this event was closer to the low point in the line than previously removed sections. A greater potential for contamination had been anticipated during work planning when work approached within ten feet of the low point in the line. More frequent characterization of the excavation area was not conducted in spite of increased proximity to the low point and an indication of increased soil radioactivity detected during the previous day. A section of concrete and waste pipe was surveyed after its removal. Subsequent to the removal of the final bucket of debris but before the contamination survey results were available, several subcontractor employees walked through the SCA at the beginning of their lunch break. Personnel contamination was found on these individuals as they exited the area for lunch. They were later found to have received uptakes of [radioactive material]. The amount of removable contamination on the exposed concrete just below the waste pipe was later found to be significant. It was fortuitous that their preliminary dose estimates were low in magnitude. It is appropriate to note that there have been no dose assignments to date as a result of this event.

Earlier on the day of these personnel contaminations and related to the same project, other subcontractor employees were observed removing a cover that restricted access to a manhole. The manhole was a known high contamination area. The workers had not signed in on the appropriate radiological work permit (RWP) and were not wearing

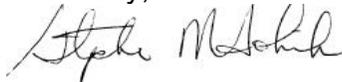
appropriate protective equipment nor were they supported by a radiation control technician (RCT). Further access to the manhole was stopped by a passing RCT. Fortunately, no radiological exposures resulted from this activity.

With respect to the above events, violations of 10 CFR 830 and 835, "Nuclear Safety Management" and "Occupational Radiation Protection," have apparently occurred. Typically, I would consider pursuing an enforcement action for the combination of such events. Relative to this event I recognize that your company has expended considerable effort investigating this event and did so expeditiously. I have also considered the fact that your past compliance history at Mound relative to decontamination and demolition activity has been good. Additionally, I considered the relatively low safety significance of the personnel contaminations. For these reasons, I have decided not to take enforcement action at this time. I am, however, concerned that your causal analysis may not have considered all contributing factors. For example, the documentation provided to this office did not offer a reason for the degradation in procedural compliance. It is important to reexamine the events' causative factors. Only after such a reexamination can it be concluded that the corrective actions are adequate and, once fully implemented, should facilitate improvement in a number of areas, including training, compliance, and assessments.

I have chosen to exercise enforcement discretion on these matters consistent with the DOE enforcement Policy. However, it should be understood that my office will continue to monitor Mound site nuclear safety performance, including any reexamination of causative factors, and will take enforcement action if warranted.

No response to this letter is required. Please contact me at (301) 903-0100, or have your staff contact Roy Gibbs at (301) 903-6231, should you have any questions.

Sincerely,



Stephen M. Sohinki

Director

Office of Price-Anderson Enforcement

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