

June 4, 1996

Mr. Ambrose Schwallie
[]
Westinghouse Savannah River Company
Building 703-A
P.O. Box 616
Road 1
Aiken, SC 29802

Dear Mr. Schwallie:

Subject: Noncompliance with 10 CFR 830.120 (Quality Assurance Requirements) and 10 CFR 835 (Occupational Radiation Protection) at selected Savannah River Site Facilities

On March 26-27, 1996, the Office of Enforcement and Investigation conducted an onsite evaluation of the five potential noncompliances reported to DOE by you in the Noncompliance Tracking System (NTS). Additionally, selected Occurrence Reporting Processing System (ORPS) reports associated with potential Price-Anderson Amendments Act (PAAA) enforcement issues were also reviewed. The following NTS and ORPS reports were included in the onsite review:

1. NTS-SR--WSRC-FCAN-1995-0001
2. NTS-SR--WSRC-WVIT-1995-0001
3. NTS-SR--WSRC-HTANK-1995-0001
4. NTS-SR--WSRC-FTANK-1996-0001
5. NTS-SR--WSRC-FCAN-1996-0001
6. SR--WSRC-ALABF-1995-0016
7. SR--WSRC-HCAN-1996-0001
8. SR--WSRC-REACK-1996-0002
9. SR--WSRC-REACC-1996-0001

The objective of this evaluation was to ascertain whether formal enforcement action was required in accordance with the DOE Enforcement Policy criteria (Appendix A to 10 CFR Part 820). During this review, the enforcement staff evaluated the rigor with which Westinghouse Savannah River Company (WSRC) was addressing the safety questions arising out of these incidents and to assess the progress of the implementation of corrective actions developed to address these problems. The reported noncompliances collectively are potential violations of the Quality Assurance and Occupational Radiation Protection Rules in the areas of: Personnel Training and Qualification, Work Processes, Radioactive Contamination Control and Monitoring, Entry Control, and Design and Control.

A review of the root causes identified by WSRC for the NTS reports indicated the following common and recurring management control problems: inadequate procedures, failure to follow procedures, and less than adequate communications. These problems are being addressed in the

corrective actions for each NTS report, but recurrence would indicate a larger programmatic weakness that needs to be addressed. During our meeting on March 27, 1996, you presented a series of ongoing programmatic improvement actions in the area of management controls which were developed as an outgrowth of your internal self-assessment of these issues.

DOE has evaluated the root cause analyses, as well as the corrective action plans, addressing each of the reported noncompliances. Such plans, if fully implemented, appear to provide substantial benefit in addressing the safety concerns. When coupled with WSRC's early proactive efforts to identify and report noncompliances and to aggressively undertake programmatic solutions in this early stage of the Price-Anderson enforcement program, it is appropriate, in this case, pursuant to the Enforcement Policy, to refrain from undertaking enforcement action at this time. Enforcement staff, in coordination with DOE Savannah River Operations Office personnel, will continue to review the implementation and adequacy of corrective actions for these issues. A final decision in this regard will be made upon the timely completion of all corrective actions and, if satisfactory, the noncompliances will be closed.

Review by the Enforcement Staff of future nuclear safety rule noncompliance issues will include consideration of the effectiveness of these corrective actions in preventing recurrence of the known problem areas such as those identified in your root cause analyses in determining whether enforcement action is warranted

If you have any further questions on these matters, please contact the DOE Savannah River Price-Anderson coordinator, Mosi Dayani at 803-725-7721, or Susan Adamovitz of my staff at 301-903-0100.

Sincerely,

R. Keith Christopher
Director
Office of Enforcement and
Investigation