

March 29, 2000

Mr. Joseph J. Buggy, President  
[ ]  
Building 703-A  
Road 1  
Aiken, SC 29802

Subject: Enforcement Letter (NTS-SR-WSRC-ESH-1999-0002)

Dear Mr. Buggy:

This letter refers to the Department of Energy's (DOE) evaluation of the facts and circumstances concerning the referenced Noncompliance Tracking System (NTS) Report which describes the failure to properly retrain portions of the Westinghouse Savannah River Company (WSRC) nonradiological workforce with General Employee Radiological Training (GERT) and the failure to provide such training to all temporary visitors and individuals badged at other DOE locations. These deficiencies were identified by the WSRC Price-Anderson Coordinator in a 10 CFR 835 assessment.

The deficiencies identified were noncompliances with the following requirements:

10 CFR 835.901 *General Employees* requires that (1) All general employees shall be trained in radiation safety prior to receiving occupational exposure during access to controlled areas at a DOE site or facility. Allowance may be made for previous DOE training on generic radiation safety topics (i.e., those not specific to a site or facility), provided the training was received at another DOE site or facility within the past two years. Documentation of the previous training shall clearly identify the individual's name, date of training, topics covered, and name of the certifying individual. The knowledge of radiation safety possessed by general employees shall be verified by examination. (2) Retraining shall be provided when there is a significant change to radiation protection policies and procedures that affect general employees and shall be conducted at intervals not to exceed two years.

In general these types of deficiencies are considered sufficient to initiate an investigation which may have resulted in an enforcement action. They are programmatic, systemic problems that led to untrained or unretained individuals entering and/or working in radiological areas.

However, DOE recognizes that the matter was self-identified in an assessment by the WSRC PAAA coordinator and that upon identification of the problem, the company correctly identified the issue as programmatic. The DOE Savannah River Operations Office confirms that WSRC moved promptly and comprehensively to mitigate risks and

reasonably assure that there would be no recurrence of the problem. Therefore, DOE has decided to issue this Enforcement Letter in lieu of initiating additional enforcement measures. We will continue to monitor this area of WSRC's nuclear safety program to assure compliance.

Should you have any questions, please contact Howard Wilchins of my staff at (301) 903-0107.

Sincerely,



R. Keith Christopher  
Director  
Office of Enforcement and Investigation

cc: B. Costner, SC-1  
D. Michaels, EH-1  
M. Zacchero, EH-1  
S. Carey, EH-1  
H. Wilchins, EH-10  
D. Stadler, EH-2  
O. Pearson, EH-3  
J. Fitzgerald, EH-5  
C. Huntoon, EM-1  
L. Vaughan, EM-5  
G. Rudy, DOE-SR  
M. Dayani, DOE-SR PAAA Coordinator  
K. Thames, DOE-SR PAAA Coordinator  
G. Bell, WSRC PAAA Coordinator  
Docket Clerk, EH-10