



Department of Energy

Washington, DC 20585

September 10, 2025

Mr. Robert Wilkinson
President and Project Manager
Central Plateau Cleanup Company, LLC
Post Office Box 1464
Richland, Washington 99352

NEL-2025-02

Dear Mr. Wilkinson:

The Office of Enforcement has completed an evaluation into a series of events that resulted in Central Plateau Cleanup Company, LLC (CPCCo) workers being exposed to hazards and risks due to weaknesses in the development, management, and implementation of hazard controls during work activities that occurred between November 15, 2021, and October 24, 2024.

The events include the following:

- On November 15, 2021, two workers at Building 211A, tasked with draining oil from a caustic pump system, were splashed with an unknown liquid, which resulted in the reddening of one worker's skin, discoloration of their clothing, and damage to a flashlight's outer coating. The liquid was later determined to be a 50 percent sodium hydroxide and 50 percent water solution, with an approximate pH of 13.
- On July 19, 2023, three workers at Building 224B were allowed to work in an excavation that was approximately 8 feet deep without the presence of a competent person¹, shoring, or a safe means of egress. Additionally, CPCCo operated heavy equipment near an energized overhead power line without ensuring it was de-energized. This created a significant risk of electrocution for workers operating the equipment.
- On September 26, 2023, five workers at Building 224B received unplanned radioactive material uptakes while filling a tank with grout. The maximum dose assigned was 2 mrem (the regulatory limit is 5,000 mrem and "as low as is reasonably achievable").
- On October 24, 2024, four workers at 105K-West Reactor (105KW) were sprayed with radioactively contaminated liquid while removing flexible hoses from

¹ 29 C.F.R. 1926, Subpart P, *Excavation*, defines a competent person as "one who is capable of identifying existing and predictable hazards in the surroundings, or working conditions which are unsanitary, hazardous, or dangerous to employees, and who has authorization to take prompt corrective measures to eliminate them."

dewatering equipment. One worker's face was radiologically contaminated at 100,000 disintegrations per minute (dpm)/100cm² beta-gamma and 500 dpm/100cm² alpha (the regulatory limits are 5,000 dpm/100cm² for total beta-gamma contamination and 500 dpm/100cm² for total alpha from transuranic contamination).

Based on this evaluation, the Office of Enforcement has identified concerns that warrant management attention by CPCCo. These events revealed underlying weaknesses in the safety management processes used to develop, manage, and implement hazard controls during work planning and execution, including (1) an overreliance on assumptions, (2) acceptance of deviation from prescribed work processes, (3) a lack of oversight of hazardous work, and (4) weaknesses in the corrective action processes intended to identify and correct process problems.

Overreliance on Assumptions

The following examples illustrate specific instances where CPCCo's inaccurate or unverified assumptions directly led to increased worker risk and hazard exposure:

- CPCCo assumed that workers at Building 211A were familiar with the caustic pump system configuration, even though these workers had limited site experience and no prior work on this type of pump. Because worker knowledge and system configuration had not been verified beforehand, this inaccurate assumption resulted in a worker misidentifying a drain plug, leading to workers being splashed with caustic liquid.
- CPCCo assumed the overhead power lines at Building 224B were de-energized without any verification process. This unchecked assumption directly led to workers excavating near live power lines, creating a significant electrocution hazard that was preventable with the proper verification protocols. Additionally, the excavation at Building 224B increased the workers' exposure to hazards by the unverified assumption regarding pipe depth; the pipe was believed to be near the surface but was much deeper. This misjudgment prompted the field work supervisor to authorize digging far beyond the authorized depth specified in the work package, resulting in three workers entering a hazardous eight-foot excavation to locate the pipe.
- CPCCo's planning for the Building 224B tank grouting relied on weather assumptions that did not account for potential changes. This inadequate assumption about stable weather led to contamination controls failing when weather conditions changed, resulting in an unplanned radioactive dose to workers.
- CPCCo assumed that a flexible hose associated with the 105KW dewatering equipment was depressurized, but did not include a verification step in the work instructions. This incorrect assumption led to the contamination of workers exceeding regulatory limits.

While CPCCo acknowledged that the assumptions discussed above were less than adequate, CPCCo did not evaluate whether there were additional assumptions associated with this type of work, or other work, that were similarly less than adequate.

Acceptance of Deviation from Prescribed Work Processes

In part because of CPCCo's overreliance on assumptions (as discussed above), work on several occasions deviated from the work instructions that were designed to ensure safe work practices. This acceptance of deviations, in turn, compromised safety controls and increased risk. For example:

- CPCCo allowed an unqualified field work supervisor to oversee and authorize work involving hazardous liquids and permitted the work to proceed without the required safety equipment, such as an emergency eyewash and shower, as specified in the work package. This acceptance of deviations from work package requirements for supervisor qualifications and safety equipment resulted in personnel exposure to a caustic liquid without the means for immediate decontamination.
- During the excavation, CPCCo allowed digging to exceed the authorized depth and did not complete the step verifying power line de-energization. This acceptance of deviations in excavation depth and electrical safety procedures resulted in workers entering an unsafe, deep excavation near potentially energized lines, demonstrating a lack of adherence to planned work controls.
- During Building 224B tank grouting, CPCCo workers intentionally modified the configuration of the planned engineered ventilation radiological hazard control (EVRHC) (i.e., removed plastic sheet curtains and chained the enclosure doors partially open). CPCCo workers described these changes as "worker easing" because they perceived the changes as making the work easier. However, this acceptance of unauthorized deviation from engineered controls significantly reduced the efficacy of the EVRHC. CPCCo workers accepted this deviation from prescribed work process controls without notifying the cognizant safety organization or raising concerns through other means such as stopping work.

These examples demonstrate CPCCo's acceptance of deviations from prescribed work processes, whether through supervisory allowance or worker-initiated changes or compromised planned safety measures, and placed workers at unnecessary risk.

Lack of Oversight of Hazardous Work

The following examples demonstrate inadequacies in CPCCo's oversight of hazardous work. Specifically, CPCCo did not ensure that identified controls were implemented, communicated to workers, or reported to the cognizant safety organizations for adjustments when deviations occurred. For example:

- CPCCo allowed a field work supervisor trainee to oversee work with caustic liquids at Building 211A without sufficient oversight from qualified personnel.

This lack of adequate oversight of a supervisor trainee contributed to the incidents involving the caustic exposure.

- During the excavation at Building 224B, CPCCo did not ensure that a competent person was present and that supervisors and workers were trained in excavation hazards. This lack of oversight regarding competent personnel and training directly resulted in workers entering an unsafe excavation environment, emphasizing a gap in safety oversight for recognized hazards.
- CPCCo's oversight of the Building 224B tank grouting was inadequate to detect or prevent workers from modifying the approved controls. This lack of effective oversight allowed "worker easing" modifications to go unnoticed, directly leading to a failure to prevent radiological exposure, specifically the "worker easing" discussed above. Because this deviation from the controls was not identified as a possible safety concern, CPCCo management did not inform the radiological control work planners of the modifications, preventing them from evaluating the impact on the EVRHC before the work was performed. Consequently, workers were exposed to unnecessary hazards.

These examples indicate a weakness in CPCCo's oversight across various hazardous work activities resulted in the improper implementation and maintenance of hazard controls, leading to increased worker risk.

Weaknesses in Corrective Action Processes

The causal analyses associated with each of these events were ineffective and did not identify systemic weaknesses within CPCCo's processes for learning from events and implementing effective corrective actions. For example:

- Although CPCCo conducted a Root Cause Analysis relating to the workers who were splashed with an unexpected liquid while working in Building 211A, the corrective actions did not prevent recurrence of similar issues. For example, CPCCo's Occurrence Report EM-RL--CPCC-CENTPLAT-2024-0005 identifies multiple instances of field teams executing out-of-sequence, out-of-scope, and tasks unspecified in the work package, demonstrating continued poor adherence to conduct of operations across projects.
- CPCCo identified in Occurrence Report EM-RL--CPCC-GENLAREAS-2023-0001 that a work package step was missed requiring electrical utilities to verify that the power line was de-energized at Building 224B. Additionally, the work package did not address the lack of a competent person and the need for training for the supervisor and workers to recognize excavation hazards.
- CPCC-CR-2024-0038, *224B CAMs [continuous air monitors] Alarm After Grouting Activities Apparent Cause Evaluation Report*, focused on the lack of a formal process for maintaining the temporary enclosure that was intended to control airborne contamination. As a result, CPCCo overlooked not only the willingness of workers to circumvent this control when they believed it impeded work, but also the weaknesses in oversight that allowed this circumvention to

occur. This limited perspective did not fully address CPCCo's responsibility for ensuring adherence to procedures and anticipating potential circumvention of controls perceived by workers as overly burdensome.

- CPCCo documented lessons learned from a similar wetting event at Building 211A in 2021, during which workers were sprayed with chemical liquids when assumptions about the contents of the system proved incorrect and were not verified prior to commencing work. However, CPCCo did not incorporate these lessons learned into concrete actions within the 105KW dewatering work plan; assumptions about system conditions were again not adequately verified. This oversight contributed to workers being sprayed with radioactive liquid, emphasizing the need for a more robust process to incorporate past lessons learned into preventative measures and to strengthen work planning practices and assumption validation.

The Office of Enforcement has elected to issue this Enforcement Letter to convey concerns about potential weaknesses in the safety management processes used to develop, manage, and implement hazard controls during work planning and execution. These concerns include: (1) an overreliance on assumptions, (2) acceptance of deviation from prescribed work processes, (3) the lack of oversight of hazardous work, and (4) weaknesses in the corrective action processes intended to identify and correct these types of issues. Issuance of this Enforcement Letter reflects DOE's decision not to pursue further enforcement activity against CPCCo at this time. In coordination with the DOE's Office of Environmental Management, the Office of Enforcement will continue to monitor CPCCo's efforts to improve nuclear and worker safety performance.

This letter imposes no requirements on CPCCo, and no response is required. If you have any questions, please contact me, or your staff may contact Mr. Jacob M. Miller, Director, Office of Nuclear Safety Enforcement, at (301) 903-7707 or Ms. Shannon Holman, Director, Office of Worker Safety and Health Enforcement, at (301) 903-0100.

Sincerely,



Robin M. Keeler
Acting Director
Office of Enforcement
Office of Enterprise Assessments

cc: Ryan Hadley, Central Plateau Cleanup Company, LLC
Raymond Geimer, HFO