

# RCD's Assessment of Recent DOE Enforcement Actions

---

Chuck Schaefer, RCD Manager

April 25, 2007

# Enforcement Action by DOE-OE

---

- LLNL received civil penalty of \$588k in 2006 due to “long-standing Radiological Protection Program, Quality Assurance and Safety Basis deficiencies”
- ANL also received a fine of \$550k in 2006 due to failures to comply with nuclear safety requirements contained in 10CFR835 and 10CFR830 and insufficient actions to address findings from prior DOE-ISM assessments
- LLNL and ANL both exempt by statute from having to pay
- BSA would not be exempt from having to pay PAAA fines

# A Summary of the Issues

---

- Unauthorized and uncontrolled removal of radioactive material from the site
- Inadequate spill response to a spill of radioactive liquid
- Radiological boundaries too large
- Lack of ESH SME involvement in work planning
- Unplanned radiological uptakes (regulatory dose limits not exceeded)

# A Summary of the Issues (Cont.)

---

- Inadequate ALARA Reviews (ALARA Committee recommendations not flowing down to RWPs)
- Repetitive failures to effectively capture, report and correct Radcon Program deficiencies
- Acknowledged failure by management to properly oversee correction of repetitive failures
- Non-conservative decision making by technical experts and field supervision
- Lack of a Confinement Policy and implementing SOPs for glove boxes and containments

# RCD's Response

---

- Convened a panel of Managers and staff to review Radiological Control and Quality issues cited in NOVs to determine if similar weaknesses exist in the BNL Program
- Develop a “punch list” of items requiring follow up
- Assign responsible individuals
- Track follow up actions in Family ATS
- Issued Report to Senior Management

# Assessment Results

---

- No significant weaknesses identified in BNL RPP, but several opportunities for improvement
  - Help ERP to establish a confinement monitoring strategy for BGRR graphite removal that is responsive to degradation of confinement (i.e., loss of HEPA Ventilation)
  - RCD benchmarked its radiological confinement policy against WSRC and is clarifying requirements in the BNL Radiological Control Manual
  - RCD revised the BNL RWP Procedure to drive increased use of BNL/DOE Lessons Learned

# Assessment Results (Continued)

---

- RCD assessed all radiologically posted areas at BNL to ensure areas were optimized
- RCD sampled departmental ALARA Committee meeting minutes to ensure flow down of committee requirements to RWPs
- Reviewed contamination monitoring strategies to ensure survey techniques are appropriate for the radiological source terms
- Published an article in the quarterly Radiological News on proper response to spills of radioactive liquids

# Assessment Results (Continued)

---

- Strengthened institutional RWP Procedure by standardizing use of “Limiting Conditions” “Hold Points” and “Void Points”
- Implemented improved performance analysis tool to identify developing trends of poor performance
- Commenced formal Verification of Effectiveness Reviews as part of triennial assessment program
- Periodic Management reviews of RWPs to ensure flow down of program expectations

# What Can You Do to Help Ensure the Success of the BNL ISM Assessment?

---

- Ask for Facility Support involvement early in the work planning process
- Ensure your staff are knowledgeable of the radiological controls that pertain to their work
- Ensure staff qualifications are current
- Ensure staff understand requirements for moving radiological materials on site and the proper actions to follow for spills