September 24, 2001

Mr. Craig Jensen
Radiation Safety Officer
Battelle Memorial Institute
Columbus Operations
505 King Avenue
Columbus, OH 43201-2693

SUBJECT: NRC INSPECTION REPORT 07000008/2001-003(DNMS) - BATTELLE

Dear Mr. Jensen:

This refers to the routine inspection conducted at your facilities located at the Battelle Columbus Laboratories' West Jefferson Site, located at West Jefferson, Ohio, on August 20 through 24, 2001. Preliminary inspection findings were also discussed with you on September 18, 2001. Areas examined during this inspection included facility management and control, radiological safety, transportation activities, Part 21, maintenance and surveillance activities, and OSHA activities.

As a result of the inspection conducted on August 20-24, 2001, the enclosed NRC Form 591, SAFETY INSPECTION, is issued for License No. SNM-7. You will note, as discussed during our September 18, 2001 telephone conversation, that this form indicates that two violations were noted during the inspection. Since the corrective measures were prompt and satisfactory, no written response other than signing and returning the last two pages of the 591 is necessary.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter and its enclosure, will be available **electronically** for public inspection in the NRC Public Document Room **or** from the *Publicly Available Records (PARS) component of NRC's document system (ADAMS)*. *ADAMS is accessible from* the NRC Web site at http://www.nrc.gov/NRC/ADAMS/index.html (the Public Electronic Reading Room).

We will gladly discuss any questions you have concerning this inspection.

Sincerely,

/RA/

Bruce L. Jorgensen, Chief
Decommissioning Branch

Docket No. 07000008
License No. SNM-7

Enclosure: As stated

cc: R. Vandegrift, Ohio Department of Health

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MATERIALS DECOMMISSIONING INSPECTION FIELD NOTES
FOR FACILITIES NEEDING SIGNIFICANT DECOMMISSIONING EFFORT

Region:	III
Inspection Report No.:	07000008/2001003 (DNMS)
License No.:	SNM-7
Docket No.:	070-00008
Licensee (Name & Address):	Battelle Memorial Institute Battelle Columbus Laboratories Decommissioning Project (BCLDP) West Jefferson, Ohio
Licensee Contact:	Craig L. Jensen, Radiation Safety Officer
Telephone No.:	(614) 424-5170
Last Amendment No.:	23
Date of Amendment:	August 25, 2001
Program Code:	21130 & 22200
Date of Last Inspection:	June 2001
Date of This Inspection:	August 20-24, 2001
Date of Next Inspection:	November-December 2001

Type of Inspection: (X) Announced ( ) Unannounced

(X) Routine ( ) Special

( ) Initial Decomm (X) Reinspection of Decomm.

Level of Inspection: (X) Normal ( ) Reduced ( ) Extended

Brief Description of Inspection Activities: This was a routine decommissioning inspection performed in accordance with Battelle's Master Inspection Plan (MIP)). The MIP specified that the following inspection procedures were to be used for this inspection:
1. 88005 MANAGEMENT ORGANIZATION AND CONTROLS;
2. 83822 RADIATION PROTECTION;
3. 87104 DECOMMISSIONING INSPECTION PROCEDURE;
4. 86740 INSPECTION OF TRANSPORTATION ACTIVITIES;
5. 36100 10 CFR PART 21 INSPECTION;
6. 88025 MAINTENANCE AND SURVEILLANCE TESTING;
7. 93001 OSHA INTERFACE ACTIVITIES.

Additionally, a number of past "Open Inspection Items" (NRC Inspection Report 070-00008/2001001) regarding the licensee's Environmental Protection Program (IP86740) were reviewed during this inspection.

The inspection included a meeting on August 21, 2001, among NRC Management (Bruce Jorgensen), NRC staff and BCLDP Management and staff. The purpose of the meeting was to discuss the BCLDP decommissioning schedule, and the NRC's considerations regarding NRC/DOE coordination and cooperation pertaining to joint over-sight of the BCLDP Decommissioning Project.

Brief Description of Findings and Actions: Two Severity Level IV violations were identified during this inspection as follows:

1. Failure to comply with the Licensee's procedure HP-AP-36.0, rev. 0, *Control of Radiation Control Program Documents* and
2. Failure to limit worker exposure to a derived airborne concentration (DAC) limit specified in a radiation work permit (RWP) for a specific decommissioning activity (see Item 3.A. below).

Open Items identified during a past NRC inspection (NRC Inspection Report (07000008/2001-001) regarding the Licensee's Environmental Monitoring Program were satisfactorily closed.

A number of concerns were also identified during the inspection as follows:

1. The licensee has lost a number of key BCLDP staff, resulting in some challenge in maintaining high performance standards;
2. The licensee was pursuing the use of a DOE "Pump and Treat System" and had not considered whether this activity was authorized by their license (see Item 2.A. below);
3. Work Instructions (established for each major decommissioning activity) had many revisions ("field changes") which could increase the potential that the original safety assessment is no longer representative of the work being done; and
5. The licensee does not possess procedures for certain shipments of licensed material for disposal.

The violations and concerns were discussed with licensee representatives during an August 24, 2001, Exit Meeting. A copy of the Attendance Record for the Exit Meeting is attached to this report.

Summary of Findings and Actions:

( ) No violations cited, clear NRC Form 591 or regional letter issued
(X)Violation(s), NRC Form 591 issued
(X)Violation(s), regional letter issued (Form 591 attached to this letter)
( ) Follow up on previous violations
(X)Follow up on Open Inspection Items

Inspectors: George (Mike) McCann, Senior Decommissioning Inspector ***/RA/***
NRC Region III, Decommissioning Branch

Mike LaFranzo, Radiation Specialist
NRC Region III, Decommissioning Branch

Bruce L. Jorgensen, Chief (August 21, 2001)
Decommissioning Branch

Accompanied By: Eric Denison, M.S., Ohio Department of Public Health

Approved by Branch Chief: ***/RA/*** Date: 09/24/01
Bruce L. Jorgensen, Chief,
Decommissioning Branch

1. SUMMARY OF DECOMMISSIONING STATUS

A. Licensee ceased operational program. (X) Y ( ) N

B. Required decommissioning financial assurance mechanisms in place. (X) Y ( ) N

C. Decommissioning Plan (DP) required. (X) Y ( ) N

D. Licensee final survey required. (X) Y ( ) N

E. NRC confirmatory survey required. (X) Y ( ) N

F. NRC closeout inspection required. (X) Y ( ) N

G. Licensee doing decommissioning planning and preparation before dismantlement. (X) Y ( ) N

H. Licensee actively remediating site. (X) Y ( ) N

I. Licensee completed site remediation. ( ) Y (X) N

Description of Facility Status: The licensee continues to remediate its facilities with good progress. All the hot cells, except for the High Energy Cell have had all bulk radiological materials removed, and placed in the High Energy Cell. The licensee now estimates the total inventory of radiological materials in the "hot cells" is closer to 2,000 curies, rather than the previous estimate of approximately 80,000 curies.

BCLDP Management indicated, during the August 21, 2001, briefing of the NRC, that they can finish the Decommissioning Project by 2006 if DOE funding is provided as committed. Previous discussions relating to possible DOE funding cuts indicated they could have delayed final decommissioning until 2012-2015. BCLDP Management was informed by the NRC that it was still exploring options regarding NRC and DOE discussions.

2. INSPECTION OF KEY DECOMMISSIONING ACTIVITIES

A. LICENSEE ACTIVITIES INSPECTED BEFORE DISMANTLEMENT

1. Licensed material used during operations has been removed from site. ( ) Y (X) N

2. Facility license conditions are in place and met by licensee. (X) Y ( ) N

3. Site security and control of contaminated material being maintained in compliance with 10 CFR 20.1801 and 20.1802. (X) Y ( ) N

4. Support systems and services (e.g., lighting, water supply) are in place. (X) Y ( ) N

5. Decommissioning schedules are consistent with timeliness requirements in 10 CFR 30.36, 40.42, and 70.38. (X) Y ( ) N

6. Licensee's record keeping is consistent with 10 CFR 30.35, 40.36, and 70.25. ( ) Y ( ) N

This area not reviewed during this inspection.

7. Financial assurance requirements are being maintained in accordance with 10 CFR 30.35, 40.36, and 70.25. ( ) Y ( ) N

This area not reviewed during this inspection.

8. Licensee is conducting site characterization in accordance with applicable radiation protection procedures. ( ) Y ( ) N

This area not reviewed during this inspection.

9. Construction of new site features (e.g., roads, rail spurs, staging areas, sediment control ponds) conforms to DP and does not compromise health and safety of workers and public. (X) Y ( ) N

10. Licensee activities conform to specific license conditions and licensee programs and procedures. (X) Y ( ) N

11. Other licensee activities: (SEE COMMENTS BELOW) ( ) Y (*) N

Basis for Findings: The NRC Inspectors, accompanied by the State of Ohio Inspector, observed the Licencee's daily 7:20 am morning meetings for Health Physics Technicians and Deconners, during which the daily decommissioning, safety and radiation protection topics and issues were discussed. The Inspectors conducted daily rounds of buildings and grounds inside the licensee's fenced site and observed decommissioning work activities, such as radiological area, equipment, and personnel surveys, storage of low level waste, personnel dress-out and PPE practices, posting, and labeling of areas and materials, and completion of logs.

Inspectors determined that the licensee was evaluating a pump and treat system used by the DOE at other DOE sites for the remediation of chemical contamination in soils. The system, referred to as the WIDE (Well Injection Depth Extraction) was being considered for extracting soluble cesium 137 from a partially remediated filter bed associated with the former research reactor located at the Battelle West Jefferson Site. The inspectors determined that the licensee had not assessed their license and approved Decommissioning Plan, to insure that the use of such a system was authorized. The BCLDP RSO took prompt action (issued an immediate stop work order) whether the license allows the proposed activity. The RSO indicated to the inspectors that this issue would be investigated immediately, and if a license amendment was necessary would take appropriate steps to submit a license amendment.

B. LICENSEE ACTIVITIES INSPECTED DURING DECONTAMINATION, DISMANTLEMENT, AND SITE REMEDIATION

1. Site security and control of contaminated material being maintained in compliance with 10 CFR Part 20. (X) Y ( ) N

2. Decontamination and dismantlement of structures are being performed consistent with DP and sound industry practice (structures include buildings, utilities, treatment lagoons, etc.). (X) Y ( ) N

3. Decontamination and remediation of the following are being performed consistent with DP and sound industry practice:

a. Soil ( ) Y ( ) N
b. Sediment. ( ) Y ( ) N
c. Surface waters. ( ) Y ( ) N
d. Groundwater ( ) Y ( ) N
e. Other mediums: ( ) Y ( ) N

Details See above regarding proposed Pump & Treat System. Inspectors observation and interview of responsible BCLDP Staff. The remediation of soils, sediments, surface water, groundwater and other media was not an area of focus for this inspection.

4. Licensee release and disposal of decommissioning wastes are consistent with DP and approved by NRC for:

a. Liquid wastes (e.g., groundwater, surface water, liquid from treatment ponds, process liquids). (X) Y ( ) N
b. Solid wastes (e.g., building materials, process and other facility equipment, concrete rubble, soil). (X) Y ( ) N
c. Other wastes:

Details: Inspector observations.

5. Temporary, on-site storage of low-level radioactive wastes from decommissioning meets license conditions and guidance in IP 84890. (X) Y ( ) N

The Licensee has not established an interim waste storage area per the NRC's current policy description. They store radiological waste pending disposal, i.e., all waste currently being stored is awaiting disposal at an approved burial site.

6. Packaging and shipment of radioactive waste materials meet requirements in 40 CFR Parts 173-178 and 10 CFR Part 71. (X) Y ( ) N

7. Restoration of site - Licensee has restored site to meet license conditions and NRC-approved plans. ( ) Y ( ) N

This area not reviewed during this inspection.

8. Licensee survey of material and equipment for free release sufficient to demonstrate compliance with release criteria. ( ) Y ( ) N

This area not reviewed during this inspection.

9. Other licensee activities:

Basis for Findings: NRC inspectors observed the licensee's low level waste storage practices and areas where materials were stored while waiting for shipment to an approved disposal site.

C. LICENSEE ACTIVITIES INSPECTED AFTER COMPLETION OF SITE REMEDIATION

1. Licensee has submitted NRC Form 314 for disposition of licensed material in accordance with 10 CFR 30.36, 40.42, and 70.38. ( ) Y ( ) N

This area not reviewed during this inspection.

2. Licensee's final survey program is acceptable (see Appendix B for inspection items for final surveys). ( ) Y ( ) N

This area not reviewed during this inspection.

3. NRC confirmatory survey performed. ( ) Y ( ) N

This area not reviewed during this inspection.

4. Site maintenance activities (if any, for restricted use) conform to license conditions and NRC-approved plans and are in place and functional. ( ) Y ( ) N

5. Other licensee activities: ( ) Y ( ) N

Basis for Findings: This area not inspected.

3. INSPECTION OF STANDARD HEALTH AND SAFETY AREAS FROM THE OPERATIONAL INSPECTION PROGRAM

A. GENERAL OVERVIEW

1. Describe the licensee's decommissioning organizational structure:

The licensee's organization was as described in the Decommissioning Plan, which was tied down in Amendment 23. The RSO performs general over-sight of the radiation protection program, and insures compliance with license conditions. The licensee's Radiological Technical Support Manager (who is also the Associate Radiation Safety Officer (ARSO)), and Radiological Field Operations Manager are responsible for the day-to-day radiation safety protection program.

2. Licensee is performing decommissioning activities in compliance with its approved DP. ( ) Y (X) N

3. Licensee has implemented procedures for the decommissioning activities identified in the DP. ( ) Y (X) N

4. The RSC and RSO fulfill license requirements to deal with all decommissioning activities. ( ) Y (X) N

Basis for Findings: Two violations were identified as follows:

1. The BCLDP *Battelle Memorial Institute Columbus Operations Decommissioning Plan*, DD-93-19, Revision 3, August 8, 2000, (DP) was incorporated by reference into the license via Amendment No. 23, License Condition Number 12.B. The DP indicates in Section 3.3.1.1 *Documentation,* that "BCLDP DDO HP Procedures shall be generated to guide the implementation of this Plan. HP Procedures shall be implemented as requirements." Further, via letter dated February 5, 1999, License Condition 12.E. incorporated BCLDP Procedure HP-AP-36.0 "Control of Revisions to Radiation Control Program Documents." This Procedure outlines the provisions and requirements which the Radiation Protection Staff must follow when they desire to modify (make Field Changes) approved radiation protection procedures. The final step in approval of modification/field changes to radiation protection procedures is the assessment and approval of the proposed change by the RSO (signified by signing form DDO-341). The inspector determined that since the incorporation of this

requirement into the license (August 25, 2000) the form DDO-341 signifying the RSO's approval had not been completed as required. Other managers (i.e., ARSO and in some cases the Radiological Field Operations Manager) had reviewed proposed changes, and documented their reviews. It appeared that adequate review had been performed by qualified personnel and no adverse risk was created by the failure of the RSO to approve the changes. After discussion with the RSO and staff it was further determined that the failure to obtain the RSO's approval was an internal communication failure, i.e., the Radiological Manager (ARSO) who was responsible for doing the review, and forwarding "Field Changes" to the RSO had not recognized the need per procedure to forward this document to the RSO for his approval.

The failure to approve and document "field changes" by the RSO is a violation of NRC license Condition 12.E. This is a Severity Level IV violation.

Upon identification of this issue to the RSO, he immediately informed BCLDP staff of the need to comply with this procedure, scheduled a training session to address this issue, and directed the ARSO to identify all documents which had been modified, and for which the RSO's approval is required. The RSO informed the inspector that this document review and approval would be completed by September 14, 2001. The inspector contacted the RSO on September 17, 2001, and was informed that all documents had been reviewed.

2. Two Radiological Awareness Report (RAR) which had been issued since the NRC's last inspection, (NRC Report No.07000008/2001-002 (DNMS)) were reviewed. The inspectors determined that three workers may have been exposed to radiological air borne contamination in excess of the limit specified in the RWP established for the work being done on August 3, 2001. Radiation Work Permit (RWP) 01-JN-0-050, which had been issued in conjunction with Work Instruction (WI) 1034R.1) specified that workers could perform work in the High Level Cell (HLC) Subcell without respiratory protection if the radiological air borne contamination levels were less than 1 Derived Airborne Concentration (DAC). On August 8, 2001, RAR -01-004 was submitted to the BCLDP Management regarding the potential exposure to workers to airborne levels in excess of 1 DAC. After performing remediation activities in the subcell, an air sample was performed which indicated that an air borne concentration of 1.92 DAC existed in the subcell. The BCLDP HP Staff determined that each individual worker received an approximate exposure of 2.88 DAC/hrs, or approximately 7.2 mRem. Although the licensee's staff had started to follow up on this issue fairly soon after occurrence to determine the cause, and take appropriate action, the NRC inspector determined that the issue was not resolved as of the date of this inspection, and that the particulars regarding this case was understood differently by Managers of the HP program.

   The failure to limit radiological air borne worker exposure to RWP limits is a violation of NRC license Condition 12.B. This is a Severity Level IV violation.

   The licensee indicated that the failure to resolve this issue in a timely manner may have been due to lack of staff to follow up on the issue, including the departure of the ALARA Coordinator. However, the licensee had recently transferred another well qualified Manager into the ALARA Coordinator position (on a part-time basis). The licensee's RSO indicated that the new ALARA Coordinator has been given the responsibility of over-seeing the timely investigation and evaluation, to insure proper corrective actions are taken.

Based on the licensee's steps to address the above violation, the NRC believes that the licensee's actions were sufficient resolve the issues.

B. FACILITIES

1. Describe, from field observation, the licensee-identified facilities and outdoor areas to be decommissioned: This area is not significantly different from the past two inspections conducted during 2001.

2. The licensee's remediation plan includes all the contaminated facilities and areas on-site and off-site. ( ) Y (X) N

3. All essential systems and services (e.g., electrical power, water supply, communications systems) are in place and functional for the planned decommissioning activities. (X) Y ( ) N

4. Licensee's emergency plan is in place and operative for the duration of decommissioning. ( ) Y ( ) N

This area not reviewed.

5. For complex sites needing site characterization, describe the key site characterization activities to be performed by the licensee to determine the nature and extent of contamination:

This area not reviewed.

6. Licensee's characterization activities performed in conformance with good industry practice. ( ) Y ( ) N

This area not reviewed during this inspection.

Basis for Findings: This area not reviewed during this inspection.

C. EQUIPMENT AND INSTRUMENTATION

1. Survey instruments are applicable to contaminants of interest. (X) Y ( ) N

2. Use of survey instruments appropriate for site. (X) Y ( ) N

Basis for Findings: Instrumentation observed during tours. Calibration practices not reviewed during this inspection.

D. MATERIALS

1. Radioactive materials licensed during operations have been removed offsite; residual quantities conform to license conditions. (X) Y ( ) N

2. Security and control of licensed materials, including contaminated areas, is being maintained. (X) Y ( ) N

Basis for Findings: These areas are adequately addressed elsewhere in this report.

E. TRAINING

1. Licensee has developed training program for new decommissioning activities (e.g., demolition of structures, excavation of soil); program is adequate. ( ) Y ( ) N

2. Training program being effectively implemented. ( ) Y ( ) N

Basis for Findings: The licensee's formal training program was not reviewed during this inspection.

F. AREA RADIATION SURVEYS AND CONTAMINATION CONTROL

1. Area surveys are being performed (X) Y ( ) N

2. Where active remediation (e.g., demolition of structures, excavation of soil) is being performed, radiation levels in unrestricted areas do not exceed 2 mrem in any one hour. (X) Y ( ) N

Basis for Findings: Inspector observations.

G. RADIATION PROTECTION

1. The licensee's approved health physics program is being implemented in the field for new decommissioning activities. (X) Y ( ) N

2. Site security and control of contaminated material are in compliance with 10 CFR 20.1801 and 20.1802. (X) Y ( ) N

Basis for Findings:

H. RADIOACTIVE WASTE MANAGEMENT / EFFLUENTS / ENVIRONMENTAL MONITORING

1. Offsite disposal of decommissioning wastes conforms to free release criteria and disposal site requirements. ( ) Y ( ) N

This area not reviewed.

2. All new effluent releases conform to DP and applicable regulations. ( ) Y ( ) N

This area not reviewed.

3. The licensee's environmental monitoring program is being implemented in conformance with the DP and all applicable limits are being met. (X) Y ( ) N

4. Temporary storage/staging areas for radioactive wastes from building demolition, equipment dismantlement, soil excavation, etc., are adequately posted and protected. (X) Y ( ) N

Basis for Findings: During a previous inspection in (Inspection Report No. 07000008/2000-002(DNMS)), the NRC identified six (6) areas of concern regarding the implementation of certain aspects of the licensee's environmental monitoring program. During

this inspection, the NRC noted that the licensee addressed each area of concern based upon the licensee's program and good industry practices. Specifically:

The licensee cleared the immediate area of tall grass and brush around an air monitoring station (concern #1);

The licensee modified the air monitoring intake system (concern #2);

The licensee changed its chain-of-custody practices and purchased a lockable container so that only authorized individuals have access to samples (concern #5); and

The licensee did not significantly reduce the number of soil samples and used reasonable judgement when a reduction showed not to significantly impact the environmental monitoring program (concern #6).

The licensee reviewed NRC concerns #3 and #4 and determined that the number and locations of the water and sediment samples were appropriate based upon the licensee's effluent pathways and good industry practices.

Upon reviewing the licensee's actions, the NRC determined that the actions taken by the licensee were appropriate. Therefore, the NRC considers these concerns closed.

In addition, the licensee has taken additional steps to determine environmental releases are within NRC regulatory limits as a result of changing conditions at the facility. Specifically,

1) The movement of licensed material from JN1 caused elevated radiation levels around JN4 as a result of skyshine. The licensee is currently monitoring JN4 to ensure elevated levels do not result in significant doses to Personnel in the area; and

2) Additional water sampling wells are being installed as a result of water infiltration into JN3 where the reactor was housed. The licensee's work in the area to remove contaminated material could result in radioactive material releases through the ground water which is the reason for the additional monitoring wells.

Also, the licensee is currently reviewing TLD monitoring stations around the facility to ensure proper monitoring of off-site radiation as conditions within the facility change.

I. RECORD KEEPING FOR DECOMMISSIONING

1. Copies of the licensee's decommissioning cost estimates and funding methods are on file. () Y ( ) N

2. Licensee has adequate records for decommissioning activities performed (e.g., for decontamination and dismantlement of structures; decontamination and remediation of soil, sediment, surface waters, groundwater; surveys of remediated facilities). () Y ( ) N

3. Licensee's financial assurance conforms with the financial assurance requirements of NRC-approved possession limits and NRC regulations. ( ) Y ( ) N

Basis for Findings: This area not reviewed during this inspection.

J. TRANSPORTATION

1. Describe the licensee's program to package and ship decommissioning waste materials:

During the inspection, the licensee shipped three containers as LSA, exclusive use shipment. The three containers were emptied of all material but internal contamination remained attached to the interior of the containers. According to the licensee, this is the first shipment from this facility where type and quantity of licensed material was determined solely on isotopic and quantitative analysis' of several wipes taken within each of the containers. However, the licensee indicated that shipments of this type will take place prior to termination of the license.

2. Licensee's program meets all applicable 10 CFR and 49 CFR requirements for marking labeling, placarding, and shipping paper requirements for radioactive waste shipments. ( ) Y ( ) N

Basis for Findings: During an inspection of an LSA shipment, the inspector evaluated the procedures and methodologies used by the licensee to assess the quantity of licensed material within the shipment to determine if they were adequate to ensure compliance with NRC and DOT regulations.

Although the licensee appeared to be using appropriate methodologies to determine the type and quantity of licensed material in the LSA shipment, the licensee acknowledged that procedures governing the characterization of the type and quantity of licensed material within the LSA shipment were not available. Due to the complexity of such characterization, failure of the licensee to possess such procedures could result in a mis-characterization of a shipment. The licensee indicated that the creation of such procedures is in process, but they may not be available until December 2001 at the earliest. The licensee indicated staffing resources in the area of transportation are insufficient to ensure the procedures are developed prior to December 2001. Further shipments of a similar type as stated above could occur prior to the completion and implementation of the new procedures.

The NRC will to monitor this area further during future inspections to assess compliance to NRC or DOT requirements.

K. POSTING AND LABELING

1. All contaminated areas, waste processing areas, and waste handling areas are posted in conformance with regulations. (X) Y ( ) N

2. Packaged radioactive waste materials are labeled in accordance with regulations. (X) Y ( ) N

Basis for Findings: Inspector observations

L. OCCUPATIONAL HEALTH AND SAFETY

1. Describe the occupational health and safety observations made at the licensee's facilities: Safety shoes, glasses and helmets required. All personnel working in these areas were provided with appropriate equipment.

2. Licensee and Occupational Safety and Health Administration were informed of occupational health and safety issues observed during the inspection. ( ) Y (X) N

Basis for Findings: Inspectors accompanied the BCLDP Certified Safety Specialist on a tour of the buildings. The Safety Specialist conducts twice daily safety audits of BCLDP work areas. Additionally, the Safety Specialist evaluates all Work Instructions (WI) for OSHA requirements and attaches to the WI a check-list documenting his review.

4. VIOLATIONS, NON-CITED VIOLATIONS, FOLLOW UP ITEMS, AND OTHER ISSUES
   Briefly state (1) the requirements and (2) how and when the licensee violated the requirement. For non-cited violations, indicate why the violation was not cited. Briefly describe follow up items and other issues.

   Two violations were identified as described in Section 3.A.4 above, involving failure to perform required actions in review of procedure changes and in adhering to RWP limitations. Both violations were being properly addressed.

   Additional issues of potential concern included staffing levels and losses, potentially uncontrolled revisions to some procedures, lack of procedures for some important activities, and planned use of a new DOE remediation process which had not been verified to be permitted by the NRC license.