



UNITED STATES
NUCLEAR REGULATORY COMMISSION

REGION III
801 WARRENVILLE ROAD
LISLE, ILLINOIS 60532-4351

*Self assessment
File - FY00*

December 13, 1999

MEMORANDUM TO: ✓ Cynthia D. Pederson, Director, DNMS
FROM: Bruce L. Jorgensen, Chief, Decommissioning Branch *B*
SUBJECT: SELF-ASSESSMENT: OPEN ITEMS IN DECOMMISSIONING

Roy Leemon recently completed the subject Branch "self-assessment." His report is attached to this memorandum.

The primary finding was that the Branch lacks formal mechanisms to track most items. The only exception was decommissioning reactor issues, which go into the RPS/IP system. While no cases of critical lapses in following up on issues (or failing deadlines) were noted in the review, it is clear that we are relying on personal memory in too many cases. It is also perhaps fortunate that much of what we do is not tightly restricted by deadlines.

We need a more formal system; however, the reactor (RPS/IP) system is not useable for tracking other Branch items. Some of the items we are tracking informally are inspection items, while others are related to licensing activities or correspondence. This may suggest we will end up with three tracking systems. I would like to avoid that complexity if feasible.

I plan to caucus with the Branch staff to consider their ideas and suggestions, so that I can report to you what our corrective actions will be. I anticipate developing and putting such actions into place by the end of January, 2000.

I would be pleased to discuss with you any suggestions you may have, and any questions, at your convenience.

Attachments: As stated

cc w/atts: R. Caniano, DNMS

December 7, 1999

AUDIT FOR OPEN ITEMS IN

DECOMMISSIONING BRANCH REPORTS

Scope of the audit

The inspector selected and reviewed a total of 17 reports, letters or other documents originated by the Decommissioning Branch during FY 1999 to identify whether there were any open items or items that required some followup. Any such items were then researched to determine whether appropriate followup had occurred and had been documented.

Audit findings

Of the 17 documents reviewed 10 contained items that were deemed to call for some subsequent followup. A Table is attached describing these items and the results of the research to identify subsequent documented followup. In a number of cases, followup either has not yet occurred or it has not been clearly documented. It is not clear that followup can be assured, given that the Decommissioning Branch does not have in place any formal system for tracking action items and/or due dates for any items other than those identified in inspection of decommissioning reactors and entered into the RPS/IP computer system. However, no specific instances were identified where an item clearly needing followup has been forgotten and deadlines or other critical actions or time limits have not been performed.

Conclusion

Decommissioning Branch utilizes a formal "open item" tracking system only for inspection issues identified at reactors in decommissioning phase. For other activities, the Branch does not formally track open items or needed followup actions. The document author (inspector or reviewer) and the branch chief informally track these items. In the absence of a formal tracking system, management oversight to ensure resolution and closure is uncertain. Also, any transfer of duty assignments risks loss of information.

AUDIT OF REPORTS FOR OPEN ITEMS

DATE OPENED or DATE OF REPORT	WHO	ITEM	FOLLOW UP DATE or COMMENT
10/06/98 Date of report	Dresden Unit 1 IR No. 98016	97013-02 VIO Failure to verify dose rate prior to conducting rounds	10/06/98 CLOSED
01/02/97 LER 50-409/97- 01(DRP)	La Crosse IR No. 98004	Both EDGs were inoperable contrary to TSs--changed TSs	10/13/98 CLOSED
10/13/98	La Crosse IR No. 98004	The (QA) auditors concluded that plant management needed to take a more aggressive approach to ensure items are completed in a timely manner. The inspectors concurred with the auditors' conclusions. At the exit, management indicated the lack of timeliness had been due to the staff's commitment to addressing other regulatory issues; once those issues were resolved management believes timeliness would improve.	None found
10/13/98	Shieldalloy Metallurgical IR No.98001	SMC has filed a license amendment request which would allow the licensee to move this material from the temporary storage area to an area where the material could become part of the West pile, but could be removed if necessary	None found
10/16/98	Former St. Eloi Corporation site IR No. 040- 02371/98001	During the survey of the basement area, where processing was believed to have occurred, some residual contamination was found. Samples for removable contamination were taken in the basement area along with a soil sample from a drain. When we analyze the results of these samples and determine our next step, we will contact you.	None found We <u>did</u> issue further correspond- ence and close out this project

11/4/98	Uranium Projectile Test Firing Facility Port Clinton, Ohio ZIP 44114-1304	Firing range tunnels have not been adequately characterized and there appears to be contamination underneath asphalt floors. Within 30 days(12/04/98) provide a schedule indicating the dates additional sample will be performed. Further, include a general outline of the radiological survey and sampling procedures to be used for our review.	None found No system to track due dates We did correspond further on this issue.
1/21/99	Battelle Memorial Institute- Columbus Operation	Your letter and the reference discussions identified a need for additional information: 1) ...information which indicates that the DOE agrees with the proposed schedule revision. 2)... a more detailed breakdown of the revised schedule, 3)... submit the procedure in final form, you will need to include copies of all cross-references and forms. 4) ...identification of proper possession limits for source and special nuclear material... which reflects Battelle's actual needs	None found No system to track due dates.
5/5/99	U.S. army Testing & Evaluation Command Aberdeen Proving Ground Jefferson Proving Ground	The site Manager indicated that it had been about 2 years since the southern boundary of the contaminated area had been inspected to examine the condition of "Caution Radioactive Materials" signs and agreed that the signs should be inspected in a more timely manner. During tours of the west boundary of the contaminated area the inspector noted that there were some areas in which the distance between the signs exceeded 200 yards. In addition, one gate signs was missing. At the exit meeting the Site Manager indicated that signs would be replaced.	None found No formal tracking

8/5/99	Dow Chemical Company- Michigan Division	1) Some of the areas in Region VA-VI were under water and were required to be dewatered before final confirmatory surveys were completed. Approximately 9-10 acres remain contaminated at this site and require remediation. 2) Grids H-7-8-9, G-7-8-9 and I-7 in VA-VI indicated radiation levels in various locations which exceeded three times background; further scans and remediation will be required in these grids.	None found No formal tracking
11/3/99	Central Michigan, University Department of Physics	NRC has determined that the former burial site does not meet the NRC's provisions for unrestricted release. Please submit to this office within 60 days (1/02/00) the actions which the University will propose for dealing with this former burial site	None found No formal tracking