

Radiological Oversight Report Defense National Stockpile Center; New Haven Depot



August 2004



**DEFENSE NATIONAL STOCKPILE CENTER
NEW HAVEN DEPOT
RADIOLOGICAL OVERSIGHT REPORT**

August 2004

Prepared for:

Defense Logistics Agency
Defense National Stockpile Center
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Executive Summary

An audit was conducted of the radiological remediation project underway at the Defense National Stockpile Center (DNSC) – New Haven, Indiana (figure 1). The audit was performed on 9 – 10 August 2004 by Mr. Clif Gray of ERS Solutions, Inc. The purpose of the audit was to ensure radiological compliance with federal, state, and local regulations and with documents submitted for this effort by the contractor performing the remediation. The visit was scheduled to coincide with the load-out phase of the project. At the time of the site assessment approximately 75% of excavation (contractor estimated that approximately 1,200 cubic yards excavated) had been completed and 3 railcars had been loaded for shipment. No shipments had been made to date. Figure 1 shows the progress of excavation along the rail line running through the site. Figure 2 shows the progress of loading materials into railcars.



Figure 1

The audit included observation of loading of materials into railcars, review of radiological documents, meetings with the contractor, US Army contracting officers, and DNSC staff, and review of records. Areas of the project reviewed were:

1. Loading operations;
2. The radiological air sampling program;
3. Radiological survey reports;
4. Quality assurance/quality control (QA/QC);
and
5. Radiological controls for worker safety.



Figure 2

This audit identified observations that are grouped into two categories; identified as overall documentation issues and safety concerns. Observations are discussed in detail in the following section.

In addition, a meeting was held with the US Army contracting representatives, Mr. Styvart and Mr. Horton, DNSC staff, Mr. Mike Pecullan, and ERS Solutions, Mr. Clif Gray. The meeting was held to discuss the change in scope for additional excavation.

1.0 Observations

Observations are defined as areas identified during the audit as needing improvement by the contractor. The observations listed below are not to be taken as directives for the on-site contractor to implement, but should be taken under consideration for improvement for their program.

1.1 Documentation

The audit included onsite review of radiological surveys, air sample reports, and daily tailgate briefings for the work site.

Observation 1

A review of the air sampling data sheets and radiological survey forms indicated that the site radiation safety officer had not documented recent surveys or air sample results. Results of surveys had not been documented for the previous two weeks.

Observation 2

Continued quality control/quality assurance issues concerning review of reports and signed off in the assigned signature block. This issue was reported in the previous report.

Observation 3

Continued quality control/quality assurance issues concerning air sampling form fields being incomplete. This issue was reported in the previous report.

Recommendations

The following recommendations are given to help correct deficiencies in the radiological program:

1. Institute of a review process for approval of radiological survey forms and records.
2. Proper and timely documentation of radiological surveys.

2.0 Safety

Observation 4

Site management has changed the required PPE for site workers. Formerly, the required PPE level was tyvek coveralls, rubber boots, and nitrile gloves. The PPE requirements were downgraded to rubber boots and nitrile gloves. Some workers were observed within the exclusion zone without boots or gloves. The tailgate safety form did not indicate that this was an acceptable practice.

As of the time of the audit, the project safety officer has not issued an approval letter for the change.

Recommendations

The following recommendations are given to help ensure that the project safety goals are met. They include:

1. Review of the change of required PPE by the project safety officer and submittal of an approval letter.
2. Change of the daily tailgate briefing form to identify acceptable levels of PPE to be worn by workers.

3.0 Conclusion

The purpose of the site visit was to determine if activities were being performed in accordance with applicable regulations and guidance documents. Findings did identify issues mainly with QA/QC, radiological documentation, and site management that should be corrected. These corrections should ensure a quality project.

In addition, a meeting was held with the US Army contracting representatives, Mr. Styvart and Mr. Horton, DNOSC staff, Mr. Mike Pecullan, and ERS Solutions, Mr. Clif Gray. The meeting was held to discuss the change in scope for additional excavation.

Certification

The following certification applies to a audit conducted on 9 - 10 August 2004 at the following facility:

Defense National Stockpile Center, New Haven, Indiana
15411 Dawkins Road
New Haven, IN 46774-9644

I certify that the information stated in this report is based on a thorough review and investigation of the DNSC facilities and completion of site radiological surveys of the storage locations for radioactive commodities, and interviews with selected personnel at DNSC. The contents of this report are true and correct to the best of my knowledge and belief.

Clifton A. Gray
Health Physicist
ERS Solutions, Inc.

Date