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Subject: Yellow Alert: Inadequate Oversight of Subcontractor Leads to Unrestricted Release

The following Bechtel Jacobs Company, LLC Lesson Learned Yellow Alert is distributed to communicate to other DOE facilities the importance of subcontractor oversight. If you have any questions, please contact Joanne Schutt at (865)483-0554, schuttj@pwtor.com

Cynthia M. Eubanks

TITLE: Yellow Alert- Inadequate Oversight of Subcontractor Leads to Unrestricted Release of a Contaminated Item

IDENTIFIER Y-2000-OR-BJCX10-0102 DATE January 27, 2000

LESSON LEARNED STATEMENT- Oversight of subcontracted work is essential to ensure that all contractual obligations, including ES&H requirements and proper radiological procedures, are strictly enforced.

DISCUSSION OF ACTIVITIES- During the late fall of 1997 and winter of 1998, a subcontractor was surveying surplus materials at the Tower Shielding Facility at ORNL. Since many of the metal items had been exposed to the neutron flux from the reactor, the predominant radioisotope present was cobalt-60, a beta-gamma emitter. Alpha contamination was much less prevalent. Due to schedule constraints, a shortage of qualified manpower, an insufficient number of alpha friskers, and the scarcity of historic alpha contamination, the subcontractor ceased to consistently conduct alpha surveys on all the items. However, the subcontracted RCTs continued to fill in "No alpha detected" on the green-tags. During June 1998, ORNL RCTs discovered Americium-241, an alpha emitter, present on a piece of a box that had been tagged as having beta-gamma contamination only. The original whole box was previously partitioned to remove the contaminated portion, and the remaining portion surveyed for beta-gamma contamination only and green-tagged for free release. The green-tagged part of the box had recently been sold as clean scrap metal to a local foundry. Expecting that more undetected alpha contamination could be present on the other pieces of the box, the High Ranking Facilities Deactivation Project manager dispatched an RCT and the Tower Shielding Facility Manager to the foundry site to resurvey the other section of the box. The RCT's survey results determined that the other section of that box was free of alpha contamination, but found previously undetected alpha contamination on a similar box from the Tower Shielding Facility. This contaminated box was decontaminated at the foundry site and later returned to ORNL.

ANALYSIS- Because of insufficient oversight of the subcontractor, Bechtel Jacobs Company was not aware of the lax surveying practices of the subcontractor until after contaminated material had been released off-site. Since schedule constraints and other pressures can often tempt subcontractors to cut corners by deviating from established procedures and practices, sufficient oversight must be provided to oversee subcontracted work to verify that ES&H requirements and other contractual obligations are being met.

RECOMMENDED ACTIONS- Subcontract Technical Representatives (STRs) are now in place to oversee all subcontracted work to verify that the subcontractors are meeting their contractual obligations and properly following procedures, standards, and applicable regulatory requirements.

PRIORITY DESCRIPTOR Yellow/Caution

FUNCTIONAL CATEGORY(S) (DOE) Environmental Restoration and Waste Management; Management

BJC TREND CODE(S) (USER-DEFINED) WM - Waste Management; Planning & Controls; SC - Subcontracting ORIGINATOR Bechtel Jacobs Company, LLC; Sylvia Wright; 865-241-5052; ORNL Projects

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KEYWORDS Tower Shielding Facility, TSF, surveys, alpha contamination

REFERENCES Occurrence Report ORO-BJC-X10ENVRES-1998-0006

HAZARDS Radiological

WORK ACTIVITY Material/Material Handling; Work Control; Waste Remediation

FOLLOW-UP ACTION- Information in this report is accurate to the best of our knowledge. As means of measuring the effectiveness of this report please notify Joanne E. Schutt at (865) 483-0554, e-mail at schuttj@pwtor.com of any action taken as a result of this report or of any technical inaccuracies you find. Your feedback is important and appreciated.