



Enforcement Program & Nuclear Safety Enforcement Updates

ECWG 2013 Fall Meeting

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Overview



- Enforcement Program Initiatives & Activities
- HS-42 Staffing/Activities
- Nuclear Safety Enforcement Case Highlights
- Takeaways



Enforcement Program Initiatives/Activities



- NTS Improvements
 - Background & ECWG Survey
 - Changes:
 - Customizable Search & Output
 - New 851 Citations
 - Updates to 835 Citations
 - Status
- New NTS Usage “Proposal”



HS-42 Staffing/Activities



- Staff Changes
- Revised Internal Screening Process
- Worked 9 Cases [April 2012 – Dec 2013]
- 5 Completed; 4 in progress
 - 1 PNOV
 - 4 Enforcement Letters



Completed Cases



Contractor	Issue	Outcome
CHPRC	Radiological Work Control Deficiencies	Enforcement Letter
BEA	Elevated Extremity Dose and Pu Contamination	PNOV
B&W Pantex	Nuclear Explosive Operations	Enforcement Letter
LANS	Tc-99 Contamination Event	Enforcement Letter
LLNS	Software QA Program Deficiencies	Enforcement Letter



BEA Extremity Exposure & Pu-Contamination PNOV



- Significance: Potential for high exposures
- Issues: Conduct of Radiological Operations
 - Inadequate L/L and engineering/admin controls
 - Procedure weaknesses in & deviations from procedures and hazards controls requirements
- Civil Penalty: \$412,500
- Mitigating Factors



Takeaways



- Culture issues can (and often do) have regulatory compliance impacts.
- Radiological contamination is important, even when there's no likely health impact.
- SQA programs need adequate definition.
- When you haven't anticipated what could go wrong, it probably will...



Questions?