

Date: Fri, 19 May 2000 11:36:11 -0400
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Subject: Yellow Alert: Radiation Work Permit Not Clear

TITLE: Yellow Alert- Radiation Work Permit Not Clear

IDENTIFIER: Y-2000-OR-BJCETTP-0401 DATE: April 11, 2000

LESSON LEARNED STATEMENT: Hazard control documents should clearly restrict activities which are not mitigated by prescribed personnel protection equipment (PPE).

DISCUSSION OF ACTIVITIES: On Wednesday, March 22, 2000, a Waste Disposition Services Subcontractor employee obtained permission from the responsible supervisor to enter a waste repackaging facility to inspect empty drums. The employee entered the area on a radiation work permit (RWP) for "Light Work Activities in a Contamination Area." Once inside the area, a chemical operator assisted the employee. While inspecting the empty drums, the employee lifted (approximately 2 inches) the lid of a drum containing waste. A radiation control technician working in the area took notice and cautioned the employee that drums cannot be opened without use of respiratory protection as stated in the Job Hazard Analysis for the waste stream being processed. The employee left the area and reported the event to the responsible Bechtel Jacobs Company safety advocate. The safety advocate notified the Bechtel Jacobs Company radiological controls engineer and the responsible industrial hygienist. It was determined that it was unlikely that the employee assumed a significant health risk either from chemical or radiological airborne contamination from the contents of the drum. However, previous headspace measurements showed that the maximum organic vapor concentration in the headspace was 20.5 ppm. Any potential exposure to organic vapors was of short duration.

ANALYSIS: The RWP under which the employee entered the repackaging area was described as applicable light work areas in a contamination area. It defined this type of work as tours, inspections, planning, system alignment and calibrations, closed system sampling, HP surveys, IH monitoring, etc. The RWP also stated under "Special Conditions" that hands-on work is strictly prohibited. The RWP was determined to be ambiguous and in need of revision. The RWP was immediately taken out of service.

RECOMMENDED ACTIONS:

*Revise the RWP for non-hands-on work tours and inspections to clarify activities that may be performed under the RWP.

*A special bioassay sample was taken.

*Develop a lesson learned describing the incident and the need for clear work control documents and strict adherence to requirements. Bechtel Jacobs Company will request that the lesson learned be issued as required reading by the Waste Disposition Services Subcontractor.

PRIORITY DESCRIPTOR: Yellow/Caution

FUNCTIONAL CATEGORY(S) (DOE): Occupational Safety & Health; Radiological Protection

BJC TREND CODE(S) (USER-DEFINED): PC - Planning & Controls; SH -Occ. Safety & Health; Rad. Protection

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NAME OF REVIEWING OFFICIAL: J. F. Preston

KEYWORDS: Job Hazard Analysis, RWP, radiation work permit, contamination

REFERENCES: None

HAZARDS: Radiological; Personnel Protection; Hazardous Material

WORK ACTIVITY: Inspection & Testing; Radiological; Material Storage

ISM CODE: F1: Define the Scope of Work, P6: Hazard Controls Tailored to Work Being Performed

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.