

State of Utah

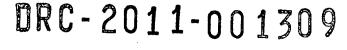
GARY R. HERBERT Governor

GREG BELL Lieutenant Governor

## Department of Environmental Quality

Amanda Smith Executive Director

DIVISION OF RADIATION CONTROL Rusty Lundberg





January 18, 2011

### CERTIFIED MAIL RETURN RECEIPT REQUIRED

Bechtel Jacobs Company, LLC ATTN: Dooley H. Buckner, Transportation Program Manager P.O. Box 4699 (Bldg K-1580; MS-7131) Oak Ridge, TN 37831

RE: Generator Access Permit Number 0209001584; NOTICE OF VIOLATION AND NOTICE OF PROPOSED IMPOSITION OF CIVIL PENALTY

Dear Mr. Buckner:

As a result of observations made during an inspection, it has come the to attention of the Utah Division of Radiation Control that Bechtel Jacobs Company, LLC., shipped radioactive waste to the EnergySolutions, LLC disposal facility located at Clive, Utah that did not conform to the Utah Radiation Control Rules.

Specifically, the Division of Radiation Control is concerned that the apparent lack of management control regarding the implementation of your waste classification procedures resulted in significant violations of Utah Radiation Control Rules. Consequently, your required response to this letter should describe those actions planned or taken to improve the effectiveness of the management control of your waste classification procedures, with particular emphasis on measures currently being taken to prevent fixture waste classification violations.

Corrective actions taken to avoid future noncompliance are expected to be effective and lasting. Utah Administrative Code Subsection R313-I4-I5(2)(b)(ii) states, "ineffective licensee programs for problem identification or correction are unacceptable. In cases involving repeated poor performance in an area of concern or serious breakdown in management control, the Executive Secretary may apply the full enforcement authority."

A Notice of Violation and Notice of Proposed Imposition of Civil Penalties is enclosed. The particular violations are described in the enclosed Notice. Your attention to this matter is appreciated.

UTAH RADIATION CONTROL BOARD

Rusty Lundberg, Executive Secretary

RL/jf Enclosure

cc: Jeff Ginsburg, EnergySolutions

### UTAH RADIATION CONTROL BOARD NOTICE OF VIOLATION

#### **AND**

#### NOTICE OF PROPOSED IMPOSITION OF CIVIL PENALTY

Bechtel Jacobs Company, LLC P.O. Box 4699 (Bldg K-1580; MS-7131) Oak Ridge, TN 37831

Generator Site Access Permit No. 020 900 1584

In a letter dated December 13, 2010, EnergySolutions notified the Utah Division of Radiation Control (UDRC) of a non-compliance issue at the EnergySolutions Low-Level Radioactive Waste Disposal Facility in Clive, Utah. The purpose of the letter was to inform the Executive Secretary of the Utah Radiation Control Board of multiple shipments with containers containing waste exceeding Class A waste limits that were accepted and disposed at the Clive facility. As a result of the investigation, violations of the Utah Radiation Control Rules were identified. The authority for this proposed action is Utah Code Annotated (1953, as amended) Section 19-3-109. The proposed penalties have been arrived at by using Rule R313-14 of the Utah Administrative Code (UAC). The particular violations and the associated proposed civil penalty are set forth below:

1. Utah Radiation Control Rule R313-26-6 states: "Generator Site Access Permittees shall be subject to the provisions of Rule R313-14 for violations of federal regulations, state rules or requirements in the current land disposal facility operating license regarding radioactive waste packaging, transportation, labeling, notification, classification, marking, manifesting or description."

License Condition 9.B of the receiving land disposal facility, EnergySolutions (Licensee), Radioactive Material License Number UT2300249, states: "In accordance with Utah Code Armotated 19-3-105, the Licensee may not receive Class B or Class C low-level radioactive waste without first receiving approval from the Executive Secretary of the Utah Radiation Control Board and also receiving approval from the Governor and the Legislature."

Contrary to this requirement, radioactive waste shipments from Bechtel Jacobs Company, LLC, (Permittee), were identified and confirmed by the Division of Radiation Control as exceeding Class A limits. The permittee misclassified and certified the waste that EnergySolutions received, accepted and disposed of as Class A. The shipments and associated containers are listed in the table below:

DATE	SHIPMENT NUMBER	CONTAINER NUMBERS
February 26, 2010	9001-01-1020	X10C0506703
·	9001-01-1021	XI0C0102456;
		X10C0012438;
		XI0C0103790;
		X10C0301419
March 1, 2010	9001-01-1023	X10C0012435;
		X10C0103824;
	·	X10C0301420
March 8, 2010	9001-01-1035	X10C0506580
March 15, 2010	9001-01-1043	X10C0012439
	9001-01-1053	X10C0012433;
		X10C0000107
	9001-01-1050	X10C0400310;
		X10C0000105;
		X10C9901032
March 18, 2010	9001-01-1055	XI0C0102820

## UTAH RADIATION CONTROL BOARD NOTICE OF VIOLATION

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#### NOTICE OF PROPOSED IMPOSITION OF CIVIL PENALTY

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Generator Site Access Permit No. 020 900 1584

These shipments consisted of metal boxes characterized and described on the Nuclear Regulatory Commission (NRC) Uniform Low-Level Waste Manifest Form 541 as Class A unstable material. It was determined that the classification calculations of the material were based on the container gross weight, rather than the net weight. Therefore, it was misclassified as Class A waste.

This violation is of significant concem and has been characterized as Severity Level III. The base penalty for this Severity Level is \$2,500.00. In accordance with R313-14-15(2)(E) "The civil penalty may be increased as much as 50% where multiple examples of a particular violation are identified during the inspection period." Since multiple shipments that exceeded the Class A limits arrived on separate days, the DRC will increase the civil penalty by 50% for multiple examples. Therefore, a civil penalty of \$2,500.00 is proposed and increased 50% for a total of \$3,750.00.

In addition, in accordance with Utah Radiation Control Rule R313-26-6 the above violation was evaluated utilizing the Generator Site Access Permit Enforcement Policy. Accordingly, Bechtel Jacobs Company, LLC., Generator Site Access Permit will be assessed 125 points for each mischaracterization of the eight waste shipments for a total of 1,000 points.

2. Utah Radiation Control Rule R313-15-1006(3), which incorporates by reference federal regulation 10 CFR 20, Appendix G, Section II. *Certification*, requires the authorized representative of the waste generator to certify that the transported material is properly classified and described.

Contrary to the above, the Permittee wrongly certified that the waste was classified as Class A.

This violation is characterized as a Severity Level IV. The base penalty for this Severity Level is \$750.00. In accordance with R313-14-15(2)(E) "The civil penalty may be increased as much as 50% where multiple examples of a particular violation are identified during the inspection period." Since multiple shipments were wrongly certified as Class A, the DRC will increase the civil penalty by 50% for multiple examples. Therefore, a civil penalty of \$750.00 is proposed and increased 50% for a total of \$1,125.00.

In accordance with Utah Radiation Control Rule R313-26-6 the above violation was evaluated utilizing the Generator Site Access Permit Enforcement Policy. Accordingly, Bechtel Jacobs Company, LLC., Generator Site Access Permit will be assessed 100 points per each shipment for failure to execute the required shipper's certification for a total of 800 points.

Regarding the civil penalties, the licensee may within 30 days of receipt of this Notice, pay the civil penalty in the amount of \$4,875.00, or may protest the imposition of the civil penalties in whole or in part by written answer. Should the permittee fail to answer in the time specified, the Utah Radiation Control Board will issue an order imposing a civil penalty in the amount proposed.

Regarding the assessed points, DRC understands that the permittee has voluntarily suspended shipments as of November 19, 2010. The DRC requires all shipments be suspended until the corrective actions are accepted by the Executive Secretary. Any reply to the Notice of Violation should include, for each violation: (1) the corrective steps which have been taken and the results achieved; (2) the corrective steps which have been taken to prevent recurrence; and (3) the date full compliance will be achieved. A response protesting the

# UTAH RADIATION CONTROL BOARD NOTICE OF VIOLATION

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Generator Site Access Permit No. 020 900 1584

Imposition of Civil Penalties shall include: (1) an admission or denial of the item of non-compliance; (2) a demonstration of extenuating circumstances; (3) a showing of error in the Notice of Violation; or (4) other reasons why the penalty should not be imposed.

Any response or written answer to this Notice of Violation/Notice of Proposed Imposition of Civil Penalty should be addressed to Rusty Lundberg, Executive Secretary, Utah Radiation Control Board, 195 North 1950 West, P.O. Box 144850, Sah Lake City, Utah 84114-4850. The licensee's attention is directed to the Administrative Procedures set forth in Utah Code Amotated (UCA) 63G-4. If a hearing is requested, the Executive Secretary of the Utah Radiation Control Board will designate the time and place of the hearing.

Upon failure to pay any civil penalty due which has been subsequently determined in accordance with the applicable provisions of UCA 19-3-109 and R313-14, the matter may be referred to the Attorney General, and the civil penalty may be collected by civil action pursuant to UCA 19-3-109(5).

UTAH RADIATION CONTROL BOARD

Rusty Lundberg, Executive Secretary

Bechtel.ClassAExceedance.Jan.13.2011

APROVED BY ONE: NO. 1150-0164. Estimated busins per response to example the minutes of the most reported by the control of the

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Oak Ridge, TN 37830 TRANSPORT CONTACT CARRIER - Name and Address CONTACT UTAH DISPOSAL PERMIT NUMBER 2530 MITCHELL STREET KNOXVILLE, IN 37917 SPECIALTY TRANSPORT LINDA LAWHORN DAVID PEMBERTON ₹ ξ ₹ ₹ ₹ 0208001584 PHYSICAL AND Solid/Ordde TORIST AND CAMBRIDAS.

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(Circ, UT 84029 ADDITIONAL INFORMATION 7.7315E+02 7.8120E+02 2.5500E+01 1.8543E+02 TOTAL PACKAGE ACTIVITY 1.9317E+01 K Bq 2.1114E+01 6.8918E-01 5 2208E-01 5.011SE+00 2.0896€+01 ğ PAGE 1 OF 2 PAGE(S) (Use this number on a 크 LSA/SCO NONE PAGE(S) 1 PAGE(S) S LSA II LSA II Š 17. 19/10/A WEIGHT (Use appropriate units) 1150.00000 kg 605.00000 kg 522,00000 kg 516 00000 kg 630.00000 kg (Include Area Code) 274 CONTACT espacie ded in occupatores with all sppilitable 2.68 m<sup>3</sup> 2.55 m<sup>3</sup> Transportation Compilance 2.55 m³ Pages ( (Use this number on all continuation 2.75 m<sup>3</sup> 2.55 m 1 and are in propes condition for sents of 10 CFR Parts 20 and 51, or 8009-01-1021-58 (435) 884-0155 2-23-10 DATE 19. IDENTIFICATION
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APPROVED BY 0MB: NO. 3150-0166 Extinated barden per response to comply with this information collection request 13 hours. This uniform mention is required by NRC to mad reporting requirements of Faderia and State Agencies for the safe transportation and dispessed of level-pertia properties and found and f

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	station fruit to Science by "F" presented in June 13. Gene 1997/0000  16. Why Enter Byrms  19. Other Describe in here 13. or additional page  104. Home Regulard  106. Home Regulard	redit master, Se	2.7893E-04 g	10-153ME-02 hg	2.20066-00	2.6862E+02	2.0868E+01	11.3743E-07 o	1,6128E-01	1.757%-02	1,9180E-04	19:2470E-02 kg	7.8120E-02  2.9133E-04 g)	Contract or Wishing with the Party of	7.5120E-02 R.9133E-04 g) [9.2470E-02 kg)	in activities	1.01016-02	9.2470E-02 kg	2.71506-02	19.1940E-06 gl	11.3460E-07 gl	8.7680E+Q1	1.7780E+02	3.4447E+D0	7 900000 +0.1		UCLIDE PERCEN	CONTAINER TOT	15. RADIOLOGICAL DESCRIPTION		1.6730E-04	_		Buc, Ex	•	-		2. MAJ
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	- i	•						_			<u></u>			ii	<del></del>	·						_			٤	C. Class C	Limetable	AS - Class A	CLASSAS	18. WASTE				18to U.S. DOE		(S)		

		5R-\$0 2.2294E+04 U (DEP) 1.9024E+02
UNIFORM LOW-LEVEL RADIOACTIVE  WASTE MANIFEST  CONTAINER AND WASTE DESCRIPTION (CONTINUATION)  SURFACE  IN.  BEGING CORT.  GRANKA  ALPHA  GAMNA  GAMNA  CONTAINER  ALPHA  GAMNA  CONTAINER  GAMNA  ALPHA  CONTAINER  GAMNA  CONTAINER  CONTAINER	WASTE DESCRIPTION  WASTE DESCRIPTION  14. CHEMICAL I  CHEMICAL FORM REDW.  (See Note 3)  CHELLTING AGE  (See Note 3)  Odds / NP	WASTE DESCRIPTION FOR EACH WASTE TYPE  WASTE DESCRIPTION FOR EACH WASTE TYPE  BORRENT CHEMICAL FORM CHELATING AGENT AGENT AGENT (See Note 1)  See Note 1)  CHEATING AGENT AGEN AGEN AGEN AGEN AGEN AGEN AGEN AGEN
	TE DESCRIPTION  14. CHEMICAL FORM CHELATING AGEN CHELATING AGEN CHELATING AGEN	Energy Solutions, Cih  14. CHEMICAL DESCRIPTION FOR EACH WASTE TYPE CHEMICAL FOREW CHEMICAL CHEMICAL TYPE ACENT Fr > 0.1% AND FORE CAS-244 CO-20 CS-137 FV-224 PV-224 PV-224
NAMERS   NAMERS   NAMERS   NAMERS   NAMERS   NAMERS	2. MANUFEST NUMBER  2. MANUFEST NAME  2.	

MASTE DESCRIPTION FOR EACH WASTE TYPE IN CONTAINER   1, October
MODICAL DESCRIPTION  MACHIDES AND ACTIVI COR CÉMITAINER TOTAL DIDNUCLUDE PERCENT  1.7345E-01 1.7356E-01 1.7345E-01
1.735E-00 gl 1.035E-00 gl 1.035
1 1 2 1 1 2 1

FORM 541A (7-2007) Form 541A (7-2007) X10C050080 Package Total Package Total CONTAINER
IDENTIFICATION
RUMBERV
GENERATOR ID
NUMBER(S) (See Note 1 & CONTAINER DESCRIPTION AOLUME 94.80000 94.80000 2.68443 288443 WRATE AND CONTAINER WEALHT 1150,00000 629 00000 1.26766 0.89336 SURFACE RADIATION LEVEL milwhy 9 9.0 2 œ CONTAINER AND WASTE DESCRIPTION (CONTINUATION) < 0.000000334 < 0.000000334 \$ ŝ ŝ SURFACE CONTAMUNATION MBq/100 cm<sup>2</sup> dpris/100 cm<sup>2</sup> UNIFORM LOW-LEVEL RADIOACTIVE
WASTE MANIFEST < 0.00000334 \*0.0000033A BETA-. 200 ŝ WASTE DESCRIPTOR (See Note 2 & Note 2A) APPROXMATE
WASTE
VOLUME(S) IN
CONTAMER 90.99800 90,99800 2.57677 2.57677 SOLIDIFICATION, STABBLIZATION, MEDIA (See Note 3) WASTE DESCRIPTION FOR EACH WASTE TYPE IN CONTAINER
14. CHEMICAL DESCRIPTION
15. RADIOLOGICAL DESCRIPTION CHEMICAL FORM CHELATING CHELATING AGENT AGENT. ( Energy Solutions, Cilve Disposal Site AG-110M AM-241 AM-243 CE-141 CE-144 PU-242 CD-80 CS-137 EU-152 PU-238 RU-103 RU-106 \$9-125 SR-90 2R-95 U-233 PU-239 Sub Total INDIVIDUAL RADIONUCLIDES AND ACTIVITY AND CONTAINER TOTAL; OR CONTAINER TOTAL ACTIVITY AND RADIONUCLIDE PERCENT 1.7928E+00 3.2023E+01 2.2890E+00 5.0515E+01 1.6237E+01 5.266 (E+03 2.2689E+02 1.1661E+04 2.4062E+03 5.7703E+03 9.0625E+00 4.1174E+01 2.4069E+00 3.3908E+02 4.9046E+00 PCVgm 1.1474E-01 1.7871E+04 1.5233E+03 6.6387E+03 1.3894E+03 5.1402E-04 5.1402E+04 2.2168E+03 2.2168E+03 8.5840£+01
2.5970£+00
1.5420£+02
3.1742£+01
7.520£+01
7.520£+01
1.5432£+01
[7.5943£+06 0]
2.340646-06 0]
2.340646-00 40]
8.5388£-00 40]
8.5388£-00 40] 6.7896E+02 [2.5293E-04 g] [8.0538E-02 kg] MBq 1,4023E-03 [9,6438E-10 q] 1,1100E-01 5,0030E-01 2,9413E-02 4,1440E-02 5,5940E-02 6.7895E+02 (2.5293E-04 g) (8.0539E-02 kg) 2,7092E+01 1.3878E-08 g) 2.7092E+01 [1.3678E-08 g] 5 8630E-02 1.0508E + 90 7.5110E-02 1.6576E+00 5.3280E-01 2. MANIFEST NUMBER PAGE 5 OF 9 PAGE(S) 8009-01-1021-08 1.8800E-00 8.1000E-02 4.1700E-00 8.5900E-01 2.0600E-00 1.83506+01 2.9700E-03 1.3464E-02 7.6705E-04 1.1088E-01 1.6036E-03 7.2490E-01 1.5741E-03 2-8115E-02 2-0097E-03 4-4-952E-02 1.4256E-02 1.8350E+01 6.3800E-00 5.436ZE-02 4.5600E-01 7.249QE-01 2,3700€+00 3.75216-05 16. WASTE CLASSIFL CATION AB - Clean A Stable AU - Clean A Unnatable B - Clean B C - Clean C ξ È