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January 11, 2006

Fernald Closure Project
Letter No. C:CPD:2006-0010

Mr. Johnny W. Reising, Director
U. S. Department of Energy
Ohio Field Office – Fernald Closure Project
175 Tri-County Parkway
Cincinnati, Ohio 45246

Dear Mr. Reising:

CONTRACT DE-AC24-01OH20115, REQUEST FOR EXTENSION TO THE TARGET DUE DATE FOR NTS REPORT NO. NTS-OH-FN-FFI-FEMP-2005-0007, "ROLL-UP OF IMPROPER RADIOLOGICAL WORK AUTHORIZATION," CORRECTIVE ACTION NO. 1

In accordance with the process and timeframes established in Site Procedure MS-1008, "Identifying, Reporting, and Tracking Price-Anderson Amendments Act (PAAA) Noncompliances," Fluor Fernald, Inc. (Fluor Fernald) hereby requests an extension to the Target Due Date for NTS Report No. NTS-OH-FN-FFI-FEMP-2005-0007, "Roll-up of Improper Radiological Work Authorization," Corrective Action No. 1. This Corrective Action states:

"Complete the investigation, which includes an Extent of Condition Analysis and a formal Root Cause Analysis of the issue(s). The Target Date includes time to independently verify and document completion of this action."

In this case, during the period of September 28, 2005 to October 30, 2005, four events occurred involving improper authorization and/or initiation of radiological work. These diverse events included an improperly conducted radiological survey resulting in an unposted Radiation Area; the release of unsurveyed equipment from a Contamination Area; subcontractor work performed without first contacting Radiological Control, as was required by the Radiation Work Permit (RWP) for the job; and the movement of contaminated Waste Pits material in a manner resulting in small amounts of contaminated mud being splattered, breaching the posted Radium Area boundary and depositing in the Uranium Contamination Area. While not directly related, these events indicate the development of a potentially adverse trend with regard to the manner in which work is planned by the Projects and the interface between the project organizations and the Radiological organization

The four incidents were reported as a roll-up on NTS on November 15, 2005. While the investigations are ongoing, their completion has been hampered significantly by the unavailability of the personnel tasked with performing the investigations; these individuals

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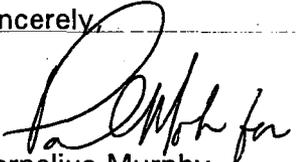
were tasked at nearly the same time with investigating and identifying process improvements for the site's Electrical Safety Program Review following a Significance Category 2 ORPS-reported incident. This event, reported as EM-OH-FCP-FFI-FEMP-2005-0043, "Near Miss - Minor Burns to the Face of an Electrician when a Flash Discharged from Inside a 480-volt Disconnect Panel During Testing," on December 7, 2005, became an immediate priority because of the potential safety impact throughout the DOE Complex.

Once the remaining interviews for the subject NTS report are completed, the Extent of Condition and Root Cause Analyses can be performed. Since this is a roll-up report of fairly dissimilar incidents that may have a common root cause, this portion of the investigation will require additional time to ensure that Fluor Fernald can continue to provide PAAA Investigation Reports that are sufficiently broad in scope, technically accurate, and of high quality.

Based on the above, Fluor Fernald requests that the original Target Due Date of January 19, 2006, for NTS Report No. NTS-OH-FN-FFI-FEMP-2005-0007 "Roll-up of Improper Radiological Work Authorization," Corrective Action No. 1, be extended four weeks, to **February 16, 2006**. For your consideration, Fluor Fernald has taken immediate actions for each of the subject reported events such that granting of the extension request for completion of the investigation will not negatively impact the protection of our workers or the environment.

If you have any questions regarding the above, please contact Brinley Varchol, Quality Assurance Director at (513) 368-5428, Robert Burgin, PAAA Facilitator at (513) 648-4318, or Don Paine, Radiological Control Program Director, at (513) 484-2251.

Sincerely,



Cornelius Murphy
Closure Project Director

CMM:RB:jmb

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Brinley Varchol, MS 42
Administrative Record, MS 6
DOE Record Center
File Record Subject: NTS-OH-FN-FFI-FEMP-2005-0001
Letter Log Copy, MS 1