



STATE OF WASHINGTON
DEPARTMENT OF HEALTH
OFFICE OF RADIATION PROTECTION
111 Israel Road SE • PO Box 47827 • Olympia, Washington 98504-7827
TDD Relay Service: 1-800-833-6388

July 26, 2017

Mike Davis
Energy Northwest
Columbia Generating Station
P.O. Box 968, North Power Plant Loop
Richland, Washington 99352-0968

Dear Mr. Davis:

Permit #G1018

This letter refers to a shipment of radioactive waste material sent to the commercial low-level radioactive waste disposal site operated by US Ecology Washington, Incorporated, near Richland, Washington. The material, listed as Radioactive Material - Low Specific Activity, (LSA II) Fissile Exempted, on shipment number 17-51, was shipped on July 20, 2017, and was received on July 20, 2017. Inspections of your shipment revealed the following violation of US Ecology Radioactive Materials license WN-I019-2 and the Washington Administrative Code:

Container Number
or Description

Summary of
Violations

Liner # 17-084-OT

Washington Administrative Code (WAC) 246-249-050(1)(a)(iii) and US Ecology Radioactive Materials License WN-I019-2 License Condition 22 require in part that waste containers received at the facility do not show an increase in in the external radiation levels recorded on the manifest, within instrument tolerances.

Contrary to these requirements, during the manifest review and un-packaging of this Class A Unstable container, it was observed that the measured surface radiation level was 1.1 R/hr on contact, and the manifest recorded surface radiation level was 12 mR/hr.

Shipment #17-51

WAC 246-249-090(5) states in part that: Certification. An authorized representative of the waste generator, processor, or

Mr. Mike Davis
July 26, 2017
Page 2 of 3

collector shall certify by signing and dating the shipment manifest that the transported materials are properly classified, described, packaged, marked, and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation, the U.S. Nuclear Regulatory Commission, and the department

Contrary to this requirement, during the manifest review of this Class A shipment the following errors were observed:

- (1) NRC Form 540 Block 5: incorrect carrier;
- (2) NRC Form 540, 541, and 541A: incorrect total shipment activity;
- (3) NRC Form 541 column 6: incorrect container type;
- (4) NRC Form 541 column 7: incorrect container volume;
- (5) NRC Form 541 column 8: incorrect container weight;
- (6) NRC Form 541 column 15: incorrect isotope activities for Co-58, Zn-65, Mn-54, Cm-242, and Fe-55.

Because of the nature of the violations found in this shipment, authorization to use the commercial low-level radioactive waste disposal site by Energy Northwest has been suspended indefinitely. Shipments in transit prior to 3:00 p.m. (Pacific Time) July 20, 2017, will be admitted to the site. Further shipments will be refused until your site use permit is reinstated.

If you wish to reestablish site use privileges, you must allow a point-of-origin inspection conducted by the state of Washington, with all expenses paid by Energy Northwest. You must also respond in writing to:

Kristen Schwab, Supervisor
Waste Management Section
Office of Radiation Protection
P.O. Box 47827
Olympia, Washington 98504-7827
(Phone: 360.236.3241)

Your response must:

- Describe the actions you have taken or plan to take to bring your activities into full compliance with all applicable state and federal regulations.
- Ensure quality assurance by addressing the root cause of each violation and the requirements of WAC 246-249-090 for a program to ensure compliance with waste forms and waste classification.

Mr. Mike Davis
July 26, 2017
Page 3 of 3

The department is also requiring you to participate in a management meeting. This meeting will be scheduled, by the department, after receipt of your root cause investigation and description of corrective actions. The department is requesting you submit, to the department, a schedule of your actions so the department can ensure staff availability.

If no response is received within 90 days, your site use permit will be terminated.

Sincerely,

A handwritten signature in blue ink, appearing to read "Kristen Schwab", with a long, sweeping flourish extending to the right.

Kristen Schwab, Supervisor
Waste Management Section

cc: US Ecology, Richland, WA
Jeremy Groom- USNRC Sr. Resident Inspector, CGS
David Pratt, UTC
Patric Lease, U.S. DOT
Leigh Ing, Texas LLRW Disposal Compact, Executive Director
Eileen Kramer, DOH, Site Use Permits