



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION IV  
611 RYAN PLAZA DRIVE, SUITE 400  
ARLINGTON, TEXAS 76011-8064

March 26, 2002

Mr. Doug Adkisson, Manager  
Fuel Operations  
Framatome ANP, Inc.  
2101 Horn Rapids Road  
Richland, Washington 99352

SUBJECT: NRC INSPECTION REPORT 70-1257/02-02

Dear Mr. Adkisson:

On March 4-8, 2002, the NRC conducted a routine inspection at the Framatome ANP facility in Richland, Washington. The purpose of the inspection was to determine whether activities authorized by your license were conducted safely and in accordance with NRC requirements. The areas examined during the inspection were radiation protection, training and low level radioactive waste storage. Within these areas, the inspection consisted of a selective examination of procedures, representative records, equipment, facilities and interviews with personnel. An exit briefing was conducted on March 8, 2002, with members of your staff.

Activities conducted at the facility were determined to be effectively implemented in the areas of radiation protection, training and low level radioactive waste storage. No violations were identified during the inspection.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be made available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

Should you have any questions concerning this inspection, please contact Dr. D. Blair Spitzberg at (817) 860-8191 or Mr. Wayne Britz at (817) 860-8194.

Sincerely,

/RA/

Dwight D. Chamberlain, Director  
Division of Nuclear Materials Safety

Docket No.: 70-1257  
License No.: SNM-1227

Enclosure:  
NRC Inspection Report  
70-1257/02-02

Framatome ANP, Inc.

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cc w/enclosure:

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bcc w/enclosure (via ADAMS distribution):

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RIV Materials Docket File

DOCUMENT NAME: Draft: S:\dnms\fcdb\wlb\20125702.wpd Final: R:\ DNMS\

RIV:DNMS:FCDB	C:FCDB	D:DNMS
WLBritz	DBSpitzberg	DDChamberlain
<i>/RA/</i>	<i>/RA/</i>	<i>/RA/</i>
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**ENCLOSURE**

U.S. NUCLEAR REGULATORY COMMISSION  
REGION IV

Docket No.: 70-1257  
License No.: SNM-1227  
Report No.: 70-1257/02-02  
Licensee: Framatome ANP, Inc.  
Facility: Framatome ANP, Inc.  
Location: Richland, Washington  
Dates: March 4-8, 2002  
Inspector: Wayne L. Britz, Fuel Facility Inspector  
Fuel Cycle Decommissioning Branch  
Approved By: D. Blair Spitzberg, Ph.D., Chief  
Fuel Cycle/Decommissioning Branch  
Attachment: Supplemental Inspection Information

## EXECUTIVE SUMMARY

Framatome ANP, Inc.  
NRC Inspection Report 70-1257/02-02

This routine, announced inspection included a review of selected aspects of the licensee's program for radiological protection, training, and low-level waste storage. The inspection also included a followup of previous inspection findings.

### Radiation Protection (83822)

- The licensee was adequately implementing the radiation protection program. The workers were observed to be following the requirements of the radiation protection program and were knowledgeable about the program requirements. The licensee met the applicable requirements set forth in the license, regulations and procedures (Section 1).

### Training (88010)

- The inspector found that the licensee has continued making improvements in the training materials and was current in its training of personnel. The training program was providing the employee training required by the regulations and the license (Section 2).

### Low-Level Waste Storage (84900)

- The waste storage facilities and activities were found to be in compliance with License Condition 6.4.2, *Solid Radioactive Waste*, and the Safety Manual, EMF-30, Section 2.2, *On-Site Transfers and Storage of Radioactive Material*, and Section 2.4, *Solid Waste* (Section 3).

### Follow up (92701)

- The inspector reviewed the additional personnel assigned to the Plant Emergency Response Management Team (PERMT) in the Emergency Plan and found them acceptable for the functions to be performed. IFI 70-1257/0106-01 is closed (Section 4).
- The inspector reviewed the changes made to the procedure used for making radiological dose projections for protective action determination in the Emergency Plan and found them acceptable. IFI 70-1257/0106-02 is closed (Section 4).
- The inspector reviewed the classification and notification matrix, the training plan, test, and list of personnel trained concerning the Interim Plant Emergency Director duties relative to protective action decisions for onsite and protective action recommendations for offsite and found them acceptable. VIO 70-1257/0106-03 is closed (Section 4).

## Report Details

### Summary of Plant Status

The fuel production facilities had been shut down the previous week for material inventory and were in the process of starting up during the inspection. The dry conversion facility (DCF) had one line operating. Except for the solids processing facility (SPF), the waste facilities were in operation.

### **1 Radiation Protection (83822)**

#### a. Inspection Scope

The inspector reviewed the licensee's program for radiation protection to determine compliance with the regulatory requirements and evaluate the adequacy of certain aspects of the licensee's radiation protection program. The review included field observations and a review of the licensee's program, procedures, posting, labeling, and control. This radiological protection inspection module is being reviewed in two different inspection periods. Exposure controls and the As Low As Reasonably Achievable (ALARA) program will be emphasized during a future inspection

#### b. Observations and Findings

The radiation protection program and procedures were reviewed for compliance with the license and the regulations. The audits of the radiation protection program conducted by the licensee's safety, security and licensing group were reviewed for compliance with 10 CFR 20.1101, *Radiation Protection Programs*; License Condition 2.7, *Internal Audits and Inspections*, of the license application; and Section 2.8.4, *Radiation Protection Program Audit*, of EMF-30, *Safety Manual*. The annual review of the radiation protection program content and implementation required for 10 CFR 20.1101 was documented in Annual Radiation Protection Program Audit, HP-4, dated December 20, 2001. The HP-4 audit included unusual incident reports, potential exposure incident reports and personal contamination reports. Thirty six audits were conducted on portions of the radiation protection program including postings, dose tracking, airborne activities, bioassays, sealed sources, protective clothing, respiratory protection, radiation work permits, radiological laboratory instrumentation, radiation protection records, the ALARA program and criticality dosimetry. The inspector reviewed the audits of the radiation protection program and found them to be thorough and detailed.

The inspector reviewed the following radiation protection group's records: 1) daily routine contamination reports, air samples logs, observation of weaknesses, potential exposures, unusual incident log, respiratory issuance log, radiation work permits and daily source check logs. The inspector toured the dry conversion and UO<sub>2</sub> facilities observing postings, equipment, radiation instrument calibrations, surveys, radiological work and general conditions individually and with the radiation protection supervisor. The inspector reviewed radiation operations with radiation protection personnel. The inspector observed the postings and work being performed under the maintenance work permits and radiation

job permits for 1) removal of an autoclave and 2) removal of out gas furnaces. The inspector found the personnel knowledgeable about the practical radiation protection programs and noted that the applicable radiation programs were being conducted in accordance with the regulations and procedures.

c. Conclusions

The licensee was adequately implementing the radiation protection program. The workers were observed to be following the requirements of the radiation protection program and were knowledgeable about the program requirements. The licensee met the applicable requirements set forth in the license, regulations and procedures.

**2 Operator Training/Retraining (88010)**

a. Inspection Scope

The inspector reviewed the licensee's training program for various plant workers and the documentation of the training to determine compliance with the regulations and license requirements.

b. Observations and Findings

The inspector training program changes were discussed with the manager of the training facility. The computerized self-training programs continued being enhanced to provide a near classroom experience when being trained with the computer. The inspector reviewed the computerized training modules for refresher training in radiation protection, respiratory protection, criticality safety, hazardous materials, and the site introductory training for newly hired personnel. The computer based training has a question session at the end and the results are stored in the system. The inspector found that the training department was continually making significant improvements to the program.

The inspector reviewed the test and examination training records for five new employees and the annual radiological and criticality safety refresher training records for five current employees. The records were current. The balance of the training records including tests, exams and complete training histories were adequate.

The training program was reviewed for compliance with the requirements of 10 CFR 19.12, *Instructions to workers*, and the license application's Section 11.5, *Training*, and Section 12.5, *Radiological Safety Training*. The inspector determined that the training program provided the initial training and followup training for radiological safety, criticality safety, respiratory protection, occupational health and safety, and instructions to workers as required.

c. Conclusions

The inspector found that the licensee has continued making improvements in the training materials and was current in its training of personnel. The training program was providing the training required by the regulations and the license for employee training.

**3 Low-Level Radioactive Waste Storage (84900)**

a. Inspection Scope

The inspector reviewed the licensee's low-level radioactive waste storage program to determine whether low-level radioactive wastes were being stored safely and in accordance with regulations and license conditions.

b. Observations and Findings

The inspector toured the low-level radioactive waste (LLRW) storage areas, reviewed the storage by type of waste, wastes being prepared for shipment, wastes waiting for processing in the modular extraction/recovery facility (MERF) and solid waste uranium recovery facility (SWUR), wastes to be used as filler in radioactive waste boxes and wastes waiting for compaction, with the licensee. The inspector reviewed the surveys, inspections and records of the low level waste storage areas. The quarterly inspection of the LLRW containers in storage required by procedure EMF-695, EMF-P43,129, *LLRW and Ash Container Handling, Storage and Shipping*, was reviewed. The drums with deficiencies were removed and repacked. The licensee's inspections also included replacing labels for those that have deteriorated from outdoor storage. The signs, postings, labeling and condition of the containers were reviewed and found to be acceptable. Good progress has continued in the reduction of the volume of LLRW stored onsite.

The inspector reviewed the computerized database for the waste records and the waste storage locations. The waste storage database and the storage areas provided an accurate description and location of the wastes.

The waste storage facilities, records and activities were found to be in compliance with License Condition 6.4.2, *Solid Radioactive Waste*, and the Safety Manual, EMF-30, Section 2.2, *On-Site Transfers and Storage of Radioactive Material*, and Section 2.4, *Solid Waste*.

c. Conclusions

The waste storage facilities and activities were found to be in compliance with License Condition 6.4.2, *Solid Radioactive Waste*, and the Safety Manual, EMF-30, Section 2.2, *On-Site Transfers and Storage of Radioactive Material*, and Section 2.4, *Solid Waste*.



#### 4 Follow up (92701)

(Closed) IFI 70-1257/0106-01: The depth of trained staff to fill the functions identified on the Plant Emergency Response Management Team (PERMT) was identified as inadequate

There were limited personnel assigned to an important response function on the PERMT in the Emergency Plan. The inspector reviewed the additional personnel assignments made to the PERMPT and found them acceptable.

(Closed) IFI 70-1257/0106-02: The procedure should describe the correct radiological dose calculation programs and meteorological information sources which are intended to be used during emergencies

The procedure in the Emergency Plan for use to determine dose projections, did not describe either of the two computer programs or the site's meteorological tower information which are used for making radiological dose projections for protective action determination. The inspector reviewed the changes made to the dose projection procedure to include these descriptions and found them acceptable.

(Closed) VIO 70-1257/0106-03: Failure to provide training to backshift personnel to perform all duties required for Interim Plant Emergency Director required by the Emergency Plan

The backshift operations personnel assigned to the position of Interim Plant Emergency Director (PED) were not trained or expected to make onsite protective action decisions or offsite protective action recommendations. Their responsibilities were limited to evacuations of buildings in response to various chemical and radiological incidents, but did not extend to protective action decisions and protective action recommendations as described in the Emergency Plan Implementing Procedure 3.1, *Plant Emergency Director*. The licensee responded to the violation on January 31, 2002, stating they had modified the Emergency Plan implementing procedures to include a Classification and Notification Matrix to assist Interim PEDs in discharging their duties relative to protective action decisions for onsite and protective action recommendations for offsite and had trained the potential Interim PEDs to the requirements of the applicable procedure changes. The inspector reviewed the classification and notification matrix, the training plan, test, list of personnel trained and found them acceptable.

#### 5 Exit Meeting Summary

The inspector presented the inspection results to members of licensee management at the conclusion of the inspection on March 8, 2002. The licensee did not identify any of the information discussed at the meeting as proprietary.

## ATTACHMENT

### SUPPLEMENTAL INSPECTION INFORMATION PARTIAL LIST OF LICENSEE PERSONNEL CONTACTED

D. A. Adkisson, Manager, Fuel Operations  
R. K. Burklin, Manager, Radiation Protection  
R. S. Freeman, Manager, Environmental, Health, Safety & Licensing  
C. D. Manning, Manager, Nuclear Criticality Safety  
J. H. Phillips, Technical Training  
T. C. Probasco, Manager, Emergency Preparedness, Industrial Safety and Security  
L. G. Stephens, Manager, Waste Processing Product Center  
T. J. Tate, Supervisor, Radiological Safety

### INSPECTION PROCEDURES USED

83822	Radiation Protection
84900	Low Level Radioactive Waste Storage
88010	Operator Training/Retraining
92701	Follow up

### OPEN, DISCUSSED AND CLOSED ITEMS

Opened                      None

Discussed                    None

Closed

70-1257/0106-01	IFI	The depth of trained staff to fill the functions identified on the PERMT was identified as inadequate
70-1257/0106-02	IFI	The procedure should describe the correct radiological dose calculation programs and meteorological information sources which are intended to be used during emergencies.
70-1257/0106-03	VIO	Failure to provide training to backshift personnel to perform all duties required for Interim Plant Emergency Director required by the Emergency Plan

LIST OF ACRONYMS USED

ADAMS	agencywide documents access and management systems
ADU	ammonium diuranate
ALARA	as low as reasonably achievable
ARF	ammonia recovery facility
CFR	Code of Federal Regulations
DCF	dry conversion facility
IFI	inspector follow-up item
LLRW	low level radioactive waste
LUR	Lagoon Uranium Recovery
MERF	modular extraction/recovery facility
NMSS	Nuclear Material Safety and Safeguards
NRC	Nuclear Regulatory Commission
PARS	publicly available records
PDR	public document room
PED	plant emergency director
PERMT	Plant Emergency Response Management Team
SNM	special nuclear material
SPF	Solids Processing Facility
SS&L	Safety, Security and Licensing
SWUR	Solid Waste Uranium Recovery facility
UO <sub>2</sub>	uranium dioxide