

November 21, 2003

MEMORANDUM TO: Joseph G. Giitter, Chief
Special Projects and Inspection Branch
Division of Fuel Cycle Safety
and Safeguards
Office of Nuclear Material Safety
and Safeguards

THRU: Brian W. Smith, Section Chief /RA/
Special Projects Section
Special Projects and Inspection Branch
Division of Fuel Cycle Safety
and Safeguards, NMSS

FROM: Lance J. Lessler, Sr. Operations Research Analyst /RA/
Special Projects Section
Special Projects and Inspection Branch
Division of Fuel Cycle Safety
and Safeguards, NMSS

SUBJECT: MEETING SUMMARY FOR PUBLIC MEETING ON NRC
BULLETIN 2003-003: " POTENTIALLY DEFECTIVE 1-INCH
VALVES FOR URANIUM HEXAFLUORIDE CYLINDERS"

Attached is a summary of the meeting that was conducted by U.S. Nuclear Regulatory Commission (NRC) staff on September 16, 2003, regarding the recent issuance of the above referenced NRC bulletin.

Attachments: 1. Meeting Summary
2. List of Attendees

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U.S. NUCLEAR REGULATORY COMMISSION

PUBLIC MEETING SUMMARY

FOR MEETING HELD ON SEPTEMBER 16, 2003

9:00 A.M.

Auditorium, Rockville, Maryland

**NRC BULLETIN 2003-003
POTENTIALLY DEFECTIVE 1-INCH VALVES FOR URANIUM HEXAFLUORIDE
CYLINDERS**

1. Welcome and Purpose of Meeting (Ms. Kathy Halvey Gibson)

Ms. Gibson (FCSS/NMSS), Acting Branch Chief for the Special Projects and Inspection Branch, opened the meeting by introducing the speakers and key participants from the NRC staff. She then described the purpose of the meeting as being to (1) describe the circumstances leading to the issuance of NRC Bulletin 2003-03 and (2) to answer questions that may come from the addressees of the bulletin or members of the public. In addition to NRC staff, Mr. Richard Boyle, Chief, Radioactive Material Branch, Office of Hazardous Material Technology, U.S. Department of Transportation (DOT), was present to answer questions.

2. Overview of Issues Leading to Issuance of NRC Bulletin 2003-03 (Dr. Lance Lessler)

Dr. Lessler (FCSS/NMSS) made a brief presentation regarding the issues that led to issuance of the Bulletin. This included displaying graphics of the cylinders and valves addressed by the Bulletin, and providing a description of the NRC Information Notices and Inspection Report that earlier made public the performance and safety concerns NRC had about the Quality Assurance Program of the Hunt Valve Company. The main reason for issuing the Bulletin was stated to be the NRC concern that some Hunt valves already delivered to users may not meet existing NRC and DOT requirements, and that it may not be obvious upon receipt of the valves from the Hunt Valve Company which valves met the requirements and which did not.

3. Review of Requested Actions in NRC Bulletin 2003-003 (Ms. Adelaide Giantelli)

Ms. Giantelli (SFPO/NMSS) followed with a brief presentation describing the actions requested of each action addressee. In summary, action addressees are requested to identify potentially defective Hunt valves under their control, ensure cylinders with such valves already installed are safely used and transported during a transition period, not to exceed twelve months, and ensure that only valves verified to be compliant with NRC regulations, NRC licenses and certificates, and DOT regulations are in use by the end of the transition period. For instances where the 1-inch Hunt valves are installed on cylinders containing depleted UF₆, that will not be

Attachment 1

transported offsite or subjected to further processing, the affected action addressees are requested to develop a safety justification for planned continued use of the Hunt valves.

4. Questions and Answers

Following these presentations, questions were solicited from the recipients of the Bulletin who were in attendance. Questions from the public also were invited after a brief break. A summary of the questions and issues raised and the NRC responses are presented below.

How would responses to the Bulletin be affected by a potential change to DOT regulations to allow UF6 cylinders meeting the applicable ISO standard?

Mr. Richard Boyle, DOT, provided a response to this question. The DOT regulations require that cylinders used in the transport of uranium hexafluoride be designed, fabricated, inspected, and marked in accordance with American National Standards Institute (ANSI) N14.1. DOT does not recognize compliance of cylinders that have been fabricated to ISO 71-95, the international standard for uranium hexafluoride cylinders, as being equivalent to compliance with ANSI N14.1. There have been discussions in the international community about harmonizing the ANSI N14.1 and ISO 71-95 standards, but completion of this effort is still several years away. The completion of the requested actions of Bulletin 2003-03 is not expected to be affected by the future harmonization of the US and international standards.

How should action addressees respond in the case that all their Hunt valves cannot be replaced or demonstrated to comply with the ANSI Standard within a year?

Action addressees are expected to make every attempt to meet the requested actions of the Bulletin. However, if an action addressee cannot meet the requested actions, the Action Addressee is expected to provide its proposed alternative plan with a supporting safety justification. The NRC will evaluate each request on a case-by-case basis.

How should the statistical sampling, prescribed in the Bulletin's requested actions, be performed, if licensees choose not to replace their Hunt valves?

The NRC expects a demonstration that every 1-inch Hunt valve meets the 400 psig hydrostatic test specified in ANSI N14.1. To demonstrate that Hunt valves meet the remainder of ANSI N14.1, the NRC expects that action addressees will propose reasonable inspection, testing, and statistical sampling methods, in light of their own unique situations and the limitations posed by the provision that documentation provided by the Hunt Valve Company cannot be referenced. While these limitations may not permit a program that provides the usual high level of confidence expected of statistical programs submitted for NRC approval, the programs submitted by the action addressees would be expected to provide a substantial added degree of assurance that the Hunt valves the action addressees plan to use meet the existing NRC and DOT requirements.

Must cylinders stored or shipped containing heels only be subject to the actions requested in the Bulletin?

The NRC staff responded that even cylinders containing only heels (i.e., remnants of UF6 remaining in a cylinder after a cylinder has been emptied under normal processing procedures) would be subject to the requested actions in the Bulletin, if they had Hunt valves installed. Such cylinders could not be shipped back to their owners for replacement of valves, in the case of cylinders that are in the possession of users other than the actual owners of the cylinders. Neither could these cylinders remain in storage at a facility (unless only depleted UF6 was in the cylinders), without being subjected to the actions requested in the Bulletin. NRC expects that action addressees in possession of cylinders they do not own to make appropriate arrangements with the owners for replacement of the Hunt valves or verification that the valves meet NRC and DOT requirements before shipment. In the case of a large number of cylinders containing only heels, that would remain on site for an extended period, before being further processed, action addressees may propose alternative solutions to those required in the Bulletin, for NRC considerations, based on sufficient safety justification for the alternative actions. Such alternatives may involve adequate identification and tagging of such cylinders to ensure that the cylinders are not further processed or shipped beyond the 12-month transition period, without being appropriately treated.

How can the requirement to verify that the 100 psig air test had been applied to a particular Hunt valve at the time of installation on a cylinder be satisfied, if the installation had been performed at another facility?

The action addressee faced with this situation would have to work with the user who originally installed the valve, to obtain such assurance, based on documentation that may have remained with the original installer.

5. Statement by Hunt Valve Company

Prior to closing the meeting, Mr. Kenneth Meyer, Senior Vice President for Quality for the Hunt Valve Company, presented a statement. Mr. Meyer stated that he has been the QC Manager for the past 16 months and he would not comment on past actions of Hunt. He briefly explained that corrective actions have been implemented and he invited industry and the NRC to conduct inspections of their current activities.

6. Summary and Closing (Dr. E. William Brach and Ms. Kathy Halvey Gibson)

Dr. Brach (Director, SFPO/NMSS) provided closing comments in which he restated that this Bulletin has been issued to inform industry and the public of a safety concern with 1-inch Hunt Valves and that packages of uranium hexafluoride are expected to be compliant with NRC regulations and certificates of compliance and applicable DOT regulations. The meeting was summarized and closed by Ms. Gibson.

ATTENDEE SIGN-IN SHEET

PUBLIC MEETING - SEPTEMBER 16, 2003

POTENTIALLY DEFECTIVE 1-INCH VALVES FOR URANIUM HEXAFLUORIDE CYLINDERS

Name	Organization
Wayne Hodges	NRC
Bill Brach	NRC
Steven Baggett	NRC
Ken Meyer	Hunt Valve Co.
Jeff Stewart	Hunt Valve Co.
Adelaide Giantelli	NRC
Lee Ewing	USEC
Mark Smith	USEC
Barry Tilden	USEC
Paul Beane	USEC
Jennifer Verkamp	
Joe Holonich	NMSS/FCSS
Robert Follett	Framatome
Melissa Mann	TLI
Clifton Farrell	NEI
Rick Boyle	US DOT
Dave McIntyre	NRC
Mike McKloskey	TLI
Mike Knapilc	McGraw-Hill
Paul J. Wogaman	DOJ
Randy DeVault	DOE
David Mardis	DOE
Felix M. Killar	NEI
J. Thompson	Descote

Jorge Ferrer	DOE
Kathy Halvey Gibson	NRC
Earl Easton	NRC
Lance Lessler	NRC
Bill Troskoski	NRC