



**UNITED STATES  
NUCLEAR REGULATORY COMMISSION**

REGION II  
SAM NUNN ATLANTA FEDERAL CENTER  
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ATLANTA, GEORGIA 30303-8931

August 11, 2004

Framatome ANP  
ATTN: Mr. Robert E. Link  
Plant Manager  
2101 Horn Rapids Road  
Richland, Washington 99352

SUBJECT: NRC INSPECTION REPORT NO. 70-1257/2004-004

Dear Mr. Link:

This report refers to the inspection conducted from July 20-22, 2004, at the Richland Facility. The purpose of the inspection was to evaluate your off-year table-top exercise to determine if the deficiencies identified during the October 22, 2003, field exercise had been corrected. At the conclusion of the inspection, the findings were discussed with those members of your staff identified in the report.

Areas examined during the inspection are identified in the report. Within these areas, the inspection consisted of selective examinations of procedures and representative records, interviews with personnel, and observation of activities in progress.

Within the scope of the inspection, violations or deviations were not identified.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter and Enclosure 1 will be 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 letter, please contact us.

Sincerely,

**/RA/**

David A. Ayres, Chief  
Fuel Facility Inspection Branch 1  
Division of Fuel Facility Inspection

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

Enclosure: (See page 2)

Enclosure: NRC Inspection Report

cc w/encl:

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U. S. NUCLEAR REGULATORY COMMISSION

REGION II

Docket No.: 70-1257

License No.: SNM-1227

Report No.: 70-1257/2004-004

Licensee: Framatome ANP, Inc.

Facility: Richland Facility

Location: Richland, Washington

Dates: July 20-22, 2004

Inspector: A. Gooden, Senior Fuel Facility Inspector

Accompanied by: Douglas M. Collins, Director, Division of Fuel Facilities Inspection

Approved by: David A. Ayres, Chief  
Fuel Facility Inspection Branch 1  
Division of Fuel Facilities Inspection

Enclosure

## EXECUTIVE SUMMARY

Framatome ANP  
NRC Inspection Report 70-1257/2004-004

This special, announced inspection was conducted in the area of emergency preparedness to determine the adequacy of corrective actions taken in response to the deficiencies identified during the biennial exercise conducted October 22, 2003. The inspection involved observation of the off-year table-top exercise, a review of selected drill records, and interviews with plant personnel. The following observations were made:

- The inspector was unable to determine the adequacy of the corrective actions on the overall emergency organization in that the exercise was limited in scope to the plant emergency response management team (PERMT). Controller induced messages simulated the response by the plant emergency response team (PERT) (Paragraph 2).
- Based on the scenario details and the plant emergency response management team (PERMT) response to the simulated accident, the inspector determined that the deficiencies which were identified during the October 22, 2003 exercise associated with the lack of scenario development, control of the exercise, and lack of training for PERMT personnel assigned to the licensee's emergency operations center had been resolved. One objective from the table-top exercise (press release approval) was not met (Paragraph 2).
- Randomly selected members of the PERMT were verified as having attended monthly training sessions and participated in a quarterly drill (Paragraph 2).

### Attachment:

List of Persons Contacted  
Inspection Procedures Used  
List of Items Opened, Closed, Discussed  
List of Acronyms

## REPORT DETAILS

### 1. Summary of Plant Status

This report covered the period of July 20-22, 2004. All plant operations were normal during the inspection period. The incinerator was shutdown for maintenance. There were no plant upsets or unusual operational occurrences during the inspection.

### 2. Emergency Preparedness (88050) (F3); (Drills and Exercises) (F3.05)

#### a. Inspection Scope

Section 7.3.2.1 of the Emergency Plan required a table-top exercise be conducted each "off-year" from the major exercise. The licensee's performance during the table-top exercise of July 21, 2004, was observed and evaluated to determine if corrective actions taken in response to deficiencies identified during the October 2003 field exercise had been resolved. The exercise scenario and objectives were reviewed for adequacy in testing the response capability of the plant emergency response management team (PERMT). The licensee's response to the simulated emergency and the critique to self identify areas of improvement were examined.

#### b. Observations and Findings

The table-top exercise was limited in scope to the PERMT and did not include a fully integrated response involving both the PERMT and the plant emergency response team (PERT). The PERT response was simulated via exercise controller induced messages. Consequently, the inspector was unable to determine the adequacy of the corrective actions on the totally integrated emergency organization (PERMT and PERT).

The PERMT assisted the Plant Emergency Director (PED) with responsibilities such as declaring the emergency, formulating protective action recommendations (PARs), and directing the response activities. The interactions within the emergency operations center by the PERMT demonstrated that personnel were familiar with their roles and responsibilities. Command and control by the PED was good throughout the simulated emergency. Decisions regarding the escalation and/or de-escalation of the emergency classification was appropriately made based on the simulated conditions of the uranium hexafluoride (UF<sub>6</sub>) cylinders located at the cylinder storage pad. The exercise scenario development, planning, and execution was effectively implemented as evidenced by the challenges presented the PERMT in accident mitigation efforts via the simulated accident conditions and the PERT response. The exercise messages and controller team provided adequate control and direction over the exercise to maintain the exercise time-line.

The licensee conducted a critique following the exercise which afforded players, controllers, evaluators, and observers an opportunity to provide comments. The exercise critique was a candid assessment of the response. Items were identified by the licensee for program improvement. Following the critique, the inspector questioned the licensee contact regarding the accomplishment of exercise objectives based on the critique and informal comments resulting from the NRC observations. The licensee

stated that objective 10, involving the PERMT's action in controlling information released to the media, was not met and would be included as an objective in the full field exercise scheduled for April 2005.

The PERMT performance in responding to the postulated accident was considered a successful demonstration of personnel who were trained, familiar with procedures for implementing the Emergency Plan, and the emergency facilities and equipment were adequate and operational. The inspector reviewed training documentation for PERMT personnel and verified that randomly selected members had attended monthly training and participated in the quarterly drills. No weaknesses were identified.

c. Conclusions

The inspector was unable to determine the adequacy of the corrective actions on the overall emergency organization in that the exercise was limited in scope to the plant emergency response management team (PERMT). Controller induced messages simulated the response by the plant emergency response team (PERT).

Based on the scenario details and the plant emergency response management team (PERMT) response to the simulated accident, the inspector determined that the deficiencies which were identified during the October 22, 2003 exercise associated with the lack of scenario development, control of the exercise, and lack of training for PERMT personnel assigned to the licensee's emergency operations center had been resolved. One objective from the table-top exercise (press release approval) was not met.

Randomly selected members of the PERMT were verified as having attended monthly training sessions and participated in a quarterly drill.

3. Exit Interview

The inspection scope and results were summarized with licensee management on July 22, 2004. Although proprietary documents and processes were occasionally reviewed during this inspection, the proprietary information is not included in this report. Dissenting comments were not received from the licensee.

**1. PARTIAL LIST OF PERSONS CONTACTED**

Licensee

- \*R. Burklin, Manager, Radiation Protection
- \*J. Deist, Nuclear Criticality Safety
- \*V. Gallacher, Manager, Chemical and Waste
- \*R. Link, Site Manager
- \*L. Maas, Manager, Licensing and Compliance
- \*C. Manning, Manager, Criticality Safety
- \*D. Parker, Manager, Environmental Health, Safety & Licensing
- \*C. Perkins, Manager, Operations
- \*T. Probasco, Manager, Safety, Security, and Emergency Preparedness
- \*L. Stephens, Manager, Ceramics
- \*B. Terhark, Manager, Human Resources
- \*L. Tupper, Manager, Quality Assurance
- \*S. Wilkerson, Vice President, Operations

\*Attended exit meeting on July 22, 2004.

Other licensee employees contacted included engineers, technicians, and office personnel.

**2. INSPECTION PROCEDURES USED**

IP 88050      Emergency Preparedness

**3. LIST OF ITEMS OPENED, CLOSED, AND DISCUSSED**

<u>Item Number</u>	<u>Status</u>	<u>Type</u>	<u>Description</u>
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None

**4. LIST OF ACRONYMS USED**

ADAMS	Agency-Wide Document Access Management System
CFR	Code of Federal Regulations
IP	Inspection Procedure
IR	Inspection Report
NRC	Nuclear Regulatory Commission
PARS	Publicly Available Records System
PED	Plant Emergency Director
PERMT	Plant Emergency Response Management Team
PERT	Plant Emergency Response Team
UF <sub>6</sub>	Uranium Hexafluoride