



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**

REGION II
SAM NUNN ATLANTA FEDERAL CENTER
61 FORSYTH STREET SW SUITE 23T85
ATLANTA, GEORGIA 30303-8931

November 26, 2004

Framatome ANP, Inc.
ATTN: Mr. Ronald J. Land
Site Manager
2101 Horn Rapids Road
Richland, Washington 99352-5102

SUBJECT: NRC INSPECTION REPORT NO. 70-1257/2004-005 AND NOTICE OF VIOLATION

Dear Mr. Land:

This report refers to the inspection conducted from October 18-28, 2004, at the Richland Facility. The purpose of the inspection was to determine whether activities authorized by the license were conducted safely and in accordance with NRC requirements. At the conclusion of the inspection, the findings were discussed with the members of your staff identified in the report.

Areas examined during the inspection were management organization and controls, operational readiness for the new Blended Low Enriched Uranium (BLEU) Facility, and transportation. The inspection consisted of selective examinations of procedures and representative records, interviews with personnel, and observations of activities in progress.

Based on the results of this inspection, the NRC has determined that a Severity Level (SL) IV violation of NRC requirements occurred. This violation was identified for the plant staff's failure to review and approve a modification to a procedure prior its use in the BLEU Powder Preparation area. This violation is cited in the enclosed Notice of Violation, and the circumstances surrounding it are described in detail in the report.

One additional SL IV violation was also identified and was treated as a non-cited violation (NCV), consistent with Section VI.A.8 of the Enforcement Policy. This NCV was identified for the plant staff's failure to test a HEPA filter prior to beginning operations. The circumstances surrounding this NCV are described in detail in the report.

If you decide to contest the Severity Level IV violation or the NCV, you should provide a response within 30 days of the date of this report, with the basis for your denial, to the Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington DC 20555-0001, with a copy to the Regional Administrator, Region II, and the Director, Office of Enforcement, United States Nuclear Regulatory Commission, Washington, DC 20555-0001.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter, its enclosures, and your response will be made available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records component of NRC's document system (ADAMS). As of October 25, 2004, the NRC initiated an additional security review of publicly available documents to ensure that potentially sensitive information is removed from the ADAMS database accessible through the NRC's web site. Interested members of the public may obtain copies of the referenced documents for review and/or

copying by contacting the Public Document Room pending resumption of public access to ADAMS. The NRC Public Documents Room is located at NRC Headquarters in Rockville, MD, and may be contacted at (800) 397-4209.

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

Enclosures: 1. Notice of Violation
2. NRC Inspection Report

cc w/encls:
Thomas Scott Wilkerson, Vice President, Operations
Framatome ANP, Inc.
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Richland, Washington 99352

Charles Perkins, Richland Operations Manager
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2101 Horn Rapids Road
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Robert E. Link, Manager
Environmental, Health, Safety & Licensing
Framatome ANP, Inc.
2101 Horn Rapids Road
Richland, Washington 99352

Loren J. Maas, Manager
Licensing and Compliance
Framatome ANP, Inc.
2101 Horn Rapids Road
Richland, Washington 99352

cc w/encls: (Cont'd on page 3)

(cc w/encls: cont'd)
 Calvin D. Manning, Manager
 Nuclear Criticality Safety
 Framatome ANP, Inc.
 2101 Horn Rapids Road
 Richland, Washington 99352

Gary L. Robertson, Director
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 M. Baker, NMSS
 PUBLIC

ADAMS: 9Yes 9No Initials: ____

9Publicly Available 9Non-Publicly Available (Draft) 9Sensitive 9Non-Sensitive

PUBLIC DOCUMENT (circle one): YES NO

OFFICE	RII:DFFI	RII:DFFI			
SIGNATURE	/RA/	/RA/			
NAME	AGooden	MCrespo			
DATE	11/29/04	11/29/04			
E-MAIL COPY?	YES NO				

NOTICE OF VIOLATION

Framatome ANP, Inc.
Richland, Washington

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

During an NRC inspection conducted on October 18 through October 28, 2004, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedures for NRC Enforcement Actions," NUREG-1600, the violation is listed below:

Safety Condition S-1 of Special Nuclear Materials License No. SNM-1227 authorizes the use of licensed materials in accordance with the statements, representations, and conditions in the License Application and Supplements.

Section 2.4 of the License Application requires, in part, that "procedures and standards shall be reviewed and approved by the management of the functional component responsible for the activity described."

Contrary to the above, on October 20, 2004, an operator used a modified document entitled "3523:004: Powder Receiver Moisture Analyzer Functional Test Data," which had not been reviewed and approved by the relevant management.

This was a Severity Level IV violation (Supplement VI).

Pursuant to the provisions of 10 CFR 2.201, Framatome ANP, Inc. is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with a copy to the Regional Administrator, Region II, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation or severity level, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. If an adequate reply is not received within the time specified in this Notice, an order or a Demand for Information may be issued as to why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

If you contest this enforcement action, you should also provide a copy of your response to the Director, Office of Enforcement, United States Nuclear Regulatory Commission, Washington, D.C. 20555-0001.

Because your response will be made publically available, to the extent possible, it should not include any personal privacy, proprietary, or safeguards information so that it can be made publically available without redaction. If personal privacy or proprietary information is necessary to provide an acceptable response, then please provide a bracketed copy of your response that identifies the information that should be protected and a redacted copy of your response that

Enclosure 1

deletes such information. If you request withholding of such material, you must specifically identify the portions of your response that you seek to have withheld, and provide in detail the basis for your claim of withholding (e.g., explain why the disclosure of information will create an unwarranted invasion of personal privacy or provide the information required by 10 CFR 2.390(b) to support a request for withholding confidential commercial or financial information). If safeguards information is necessary to provide an acceptable response, please provide the level of protection described in 10 CFR 73.21.

In accordance with 10 CFR 19.11, you may be required to post this Notice within two working days.

Dated this 26th day of November, 2004

U. S. NUCLEAR REGULATORY COMMISSION

REGION II

Docket No.: 70-1257

License No.: SNM-1227

Report No.: 70-1257/2004-005

Licensee: Framatome ANP, Inc.

Facility: Richland Facility

Location: Richland, Washington

Dates: October 18-28, 2004

Inspectors: M. Crespo, Fuel Facility Inspector
A. Gooden, Senior Fuel Facility Inspector

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

EXECUTIVE SUMMARY

Framatome ANP, Inc.
NRC Inspection Report 70-1257/2004-005

This routine, announced inspection included portions of the core inspection program in the areas of management organization and controls, and transportation. It also included a special review of the operational readiness of the new Blended Low Enriched Uranium (BLEU) Facility to supplement the core inspection program. The inspection involved observation of work activities, a review of selected records, and interviews with plant personnel.

Based upon the results of this inspection, selected activities at the facility were generally characterized by adequate program implementation. The inspection results are summarized below:

Management Organization and Controls

- The management changes met the license requirements for education and experience of personnel assigned those positions (Paragraph 2.a).
- The system to review and issue procedures met the license requirements. However, a violation was identified (in implementing the system) for using a modified procedure that had not received approval or review from management (Paragraph 2.b).
- The licensee's Startup Council adequately reviewed and controlled the introduction of enriched material into the BLEU Powder Receipt and Storage areas (Paragraph 2.c).
- The licensee's engineering change notice process adequately controlled configuration of process equipment and incorporated safety reviews (Paragraph 2.d).
- One non-cited violation was identified for failure to test a high efficiency particulate air filter prior to its first use (Paragraph 2.e).

BLEU Operational Readiness

- Plant activities were performed by knowledgeable operators in accordance with regulatory requirements and license conditions. Housekeeping was adequate with no adverse impact on radiological safety or emergency egress (Paragraph 3.a).
- The licensee's preventive maintenance database for items relied on for safety (IROFS) was being developed. The licensee's implementation of the Maintenance Program was adequate to ensure IROFS were tested and maintenance work reviewed by safety (Paragraph 3.b).
- The licensee had implemented several new radiation protection controls to address the radiation levels associated with the BLEU material (Paragraph 3.c).
- The licensee was adequately training and testing operators assigned to BLEU operations (Paragraph 3.d).

Transportation

- The activities associated with the preparation and delivery of shipping containers were conducted in a safe manner and in accordance with regulatory requirements. Within the areas examined, controls were in place and properly implemented to ensure that shipping containers were radiologically safe and all communications regarding the container contents were appropriately displayed (Paragraph 4.a).
- The operations associated with the receipt of shipping containers were conducted in a safe manner. Radiological surveys were adequate for determining if contamination and radiation levels were within the allowable limits, and the required labels/markings were applied to the incoming cylinders (Paragraph 4.b).
- Current Certificates of Compliance were on file for all containers in use, and Model 30B cylinders were maintained in accordance with the respective certificate (Paragraph 4.c).
- A management control program was in place for ensuring that transportation activities were conducted in accordance with requirements (Paragraph 4.d).

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 October 18-28, 2004. Most fuel manufacturing operations were in a planned shutdown during the inspection period.

2. Management Organization and Controls (88005)

a. Organizational Structure (O5.01)

(1) Inspection Scope and Observations

The inspectors reviewed changes in management responsibilities and functions that had occurred during the past six months to verify that license requirements in this area were being met. Ronald Land was recently appointed to the position of Site Manager, and Robert Link was assigned the position of Environmental Health, Safety and Licensing Manager. By interviewing licensee personnel and reviewing applicable records, the inspectors determined that the relevant management staffs' qualifications met the license requirements for education and work experience.

The inspectors also noted that the management organization reporting structure had changed. Previously, the Site Manager and Operations Manager reported directly to the Vice President of Operations. The change resulted in the Site Manager reporting to the Vice President of Operations and the Operations Manager reporting to the Site Manager. No significant issues were noted from this change.

(2) Conclusions

The management changes met the license requirements for education and experience of personnel assigned those positions.

b. Procedure Controls (O5.02)

(1) Inspection Scope and Observations

The inspectors reviewed the licensee's system for revising and issuing procedures to verify that the safety significance aspects were properly controlled and approved by appropriate management. The inspectors reviewed selected standard operating procedures (SOPs) in effect in the new BLEU areas processing enriched material. The inspectors verified that the SOPs adequately reflected the actual plant systems in the field. The inspectors also noted that all SOPs were adequately controlled via the computer control system. The inspectors noted that the licensee performed a verification that administrative controls from the Nuclear Criticality Analyses flow down into the SOPs prior to their final approval.

During the review of SOP use in the downloading station of the BLEU area, the inspectors noted operators using a data form for the functional test of the moisture monitor (an item relied on for safety (IROFS)). The inspectors noted that the form had

field changes with no visible approvals authorizing the changes. The inspectors reviewed the modifications to the form and found the modifications to be of low safety significance. However, according to section 2.4 of Special Nuclear Material License Number SNM-1227, procedures and standards shall be reviewed and approved by the management of the functional component responsible for the activity described. Contrary to the above, operations were being performed with this modified procedure that had not been approved by the management of the functional component responsible for the activity described. This finding constituted violation (VIO) 70-1257/2004-005-01.

(2) Conclusions

The system to review and issue procedures met the license requirements. However, a violation was identified for using a modified procedure that had not received approval or review from management.

c. **Safety Committees (O5.04)**

(1) Inspection Scope and Observations

The inspectors reviewed and discussed with the licensee the minutes from the Startup Council meetings that reviewed whether the BLEU's Powder Receipt and Storage areas could begin processing enriched uranium. The minutes included details on the remaining items left to be performed prior to enriched uranium processing. The inspectors noted that all the items were signed off as complete, and the appropriate approvals were obtained prior to final release. The inspectors also noted the appropriate attendance/reviews for the council meetings.

(2) Conclusions

The licensee's startup council adequately reviewed and controlled introduction of enriched material into the Powder Receipt and Storage areas.

d. **Internal Reviews and Audits (O5.03), Quality Assurance Programs (O5.05)**

(1) Inspection Scope and Observations

The inspectors reviewed the licensee's implementation of the Engineering Change Notice (ECN) process to verify that the licensee was adequately implementing configuration control. The ECN process was the licensee's procedure for modifying or installing process equipment. The inspectors reviewed the ECN documents for the construction of the BLEU areas to verify that they were properly incorporating the safety departments. The inspectors verified that any modifications to the initial BLEU installation plans (such as the additional enclosure for the Pelletizer Can Inverter) were done via ECN field changes that incorporated the safety department. No issues were noted.

Findings from the safety discipline's reviews of installation plans and installed equipment were incorporated into the start-up council's punch list. The punch list for Powder Preparation was reviewed and found to be signed off as complete and approved for operation. No issues were noted.

(2) Conclusions

The licensee's ECN process adequately controlled configuration of process equipment and incorporated safety reviews.

e. **Event Follow-up**

(1) Inspection Scope and Observations

The inspectors reviewed an event that occurred during the inspection regarding the failure to adequately test a high efficiency particulate air (HEPA) filter prior to operations of the pertinent area. The licensee had performed a scheduled replacement of the final HEPA filter bank for the ceramics area of the facility. However, the HEPA filter bank could not be tested due to deficiencies in the analyzer used for the test. License application SNM-1227 specifically stated in section 3.2.2 that the final HEPA filter installations, such as this one, would be tested prior to first use. Contrary to this condition, the final HEPA filter installation was not tested prior to first use. On October 18, 2004, the ceramics area had started operations with a final HEPA filter bank without a successful test verification. On October 19, 2004, the licensee successfully tested the HEPA filter bank. During the morning operations meeting on the 19th, the licensee identified that operations had begun prior to performing the filter testing. The inspectors reviewed the licensee's assessment of this event and concluded that the event was not safety significant because the HEPA filter bank successfully passed the test. The licensee entered the finding into their corrective actions system to further investigate the issue and plan long term corrective actions. Based on the licensee's actions, this non-repetitive, licensee identified event of low safety significance is being treated as a non-cited violation (NCV) consistent with Section VI.A.8 of the NRC Enforcement Policy (NCV 70-1257/2004-05-02, Failure to test a HEPA filter prior to beginning operations). This item is considered closed.

(2) Conclusions

One non-cited violation was identified for failure to test a HEPA filter prior to beginning operations.

3. **BLEU Operations Review (Inspection Procedure (IP) 88020)**

a. **Operations**

(1) Inspection Scope and Observations

The inspectors reviewed operational, housekeeping and testing activities associated with the new BLEU fuel manufacturing areas to determine if they were being performed

safely and in accordance with license requirements. The inspectors noted that these operational and maintenance activities were performed with the appropriate personal protective equipment and according to procedure. The inspectors also noted the appropriate level of housekeeping, with no issues that would effect emergency egress.

The inspectors reviewed the procedure for unloading BLEU powder from the shipping containers into 55 gallon drums (the downloading station), which was processing enriched uranium. The inspectors noted that the procedure had adequate details for performing the operation. The inspectors also interviewed several operators and supervisors regarding their areas of responsibility. The inspectors noted that the operators and supervisors were knowledgeable of the safety systems for their area. The inspectors also noted that the operators and supervisors for the downloading station knew what actions to take should a high moisture alarm occur.

The inspectors also noted that the licensee's Integrated Safety Analysis (ISA) stated that there were no sole IROFS in the system. The inspector reviewed all the IROFS for the BLEU areas and agreed with the licensee's conclusion.

(2) Conclusions

Plant activities were performed by knowledgeable operators in accordance with regulatory requirements and license conditions. Housekeeping was adequate with no adverse impact on radiological safety or emergency egress.

b. Maintenance

(1) Inspection Scope and Observations

The inspectors reviewed the licensee's implementation of the maintenance program with regard to the new BLEU areas. The inspectors noted that all maintenance work was performed through the work order system, which helped assure that the licensee's safety function reviewed the appropriate maintenance work requests.

Throughout the plant, equipment that the licensee had determined to be significant was assigned a plant identification number (PIN). The licensee was developing a database that listed PINs associated with IROFS and any preventative maintenance or calibration that needed to be performed for that IROFS. The inspectors noted that the system was adequate to identify with which IROFS each PIN was associated. The inspectors noted that several of the preventive maintenance procedures listed for IROFS in the database were incorrect. Upon informing the licensee of the observation, the licensee stated that these issues would be addressed by the time the entire database was completed.

The inspectors also reviewed the procedure for testing IROFS post-maintenance and found no issues.

(2) Conclusions

The licensee's preventive maintenance database for IROFS was being developed. The licensee's implementation of the maintenance program was adequate to ensure IROFS were tested and maintenance work reviewed by the safety function.

c. **Radiation Protection**

(1) Inspection Scope and Observations

The inspectors reviewed with the licensee's Radiation Protection Manager the new controls that were being implemented due to the elevated radiation concerns for the BLEU material. The new drum inverter for the transfer of material from 55 gallon drums to 45 gallon drums was in an enclosed area to reduce the potential for airborne exposure. The new drum inverter for the pelletizer (an operation that was performed manually in the Dry Conversion Facility (DCF)) was not enclosed, however, multiple controls were in place and tested to ensure the drums were adequately sealed during the inverting process.

The licensee had placed several continuous air monitors throughout the BLEU area to monitor any elevated airborne occurrences. Also, in the 55 gallon storage area, a wall mounted radiation monitor was installed which communicated to the operators the radiation dose levels associated with the room. The monitored value at the time of this inspection was near background levels due to the low amounts of material in the room. The licensee had also implemented lower contamination limits than in their normal process areas (note that the BLEU material was more active, yet the limits were still set lower). Overall, no issues were noted.

(2) Conclusions

The licensee had implemented several new radiation protection controls to address the radiation levels associated with the BLEU material.

d. **Training**

(1) Inspection Scope and Observations

The inspectors reviewed the operators training program for the BLEU area. The inspectors noted that the training program required a skills demonstration as well as a written exam. The inspectors also noted an emphasis on the IROFS of the BLEU systems. The inspectors were informed that the initial operation of the Powder Preparation Blender would include oversight by qualified operators from the DCF. The inspectors also reviewed the training matrix for the BLEU systems that had yet to begin operations with enriched material. The inspectors noted adequate amounts of cross-qualification to ensure a back-up operator would be available. No issues were noted in the training program.

(2) Conclusions

The licensee was adequately training and testing operators assigned to BLEU operations.

4. **Transportation (86740)**

a. **Preparation and Delivery of Radioactive Shipments (R4.01 and R4.02)**

(1) Inspection Scope and Observations

Transportation activities associated with the packaging and shipment of radioactive materials were reviewed to verify that activities were conducted in accordance with NRC and Department of Transportation (DOT) regulations.

The inspectors reviewed procedures, interviewed personnel with responsibility for preparing shipping papers, reviewed shipping documentation for select domestic and international shipments, discussed with operators the preparation of uranium hexafluoride (UF₆) cylinders for shipment, and observed radiation safety personnel conducting a transport vehicle release survey. No issues were identified. Radiation surveys were adequate, the selected shipments were made using containers with current NRC Certificates of Compliance (CoC), and the shipping documentation was consistent with requirements. Nuclear material shipping and receiving personnel assigned the responsibility for preparing shipping documentation were familiar with the requirements and recent changes to NRC and DOT regulations (effective October 1, 2004). Training for personnel involved in the preparation and transport of UF₆ cylinders was current and consistent with requirements in 49 CFR Part 172.

(2) Conclusions

The activities associated with the preparation and delivery of shipping containers were conducted in a safe manner and in accordance with regulatory requirements. Within the areas examined, controls were in place and properly implemented to ensure that shipping containers were radiologically safe and all communications regarding the container contents were appropriately displayed.

b. **Receipt of Packages (R4.03)**

(1) Inspection Scope and Observations

Transportation activities associated with the receipt of packages were reviewed to verify that activities were conducted in accordance with 10 CFR 20.1906.

The inspectors reviewed procedures, conducted interviews and a walkthrough with material shipping and receiving personnel involved in the receipt and storage of the BLEU material, and observed operators and radiation safety personnel during the unloading, weighing, and assaying of UF₆ cylinders. In the event a cylinder failed the assay criteria, personnel took actions in accordance with procedures and instructions.

No significant findings were identified. All personnel were knowledgeable regarding procedure requirements and the container receipt surveys required. Surveys were adequate for determining if contamination and radiation levels were within the allowable limits. The inspectors noted that the appropriate labeling/markings were applied to cylinders.

(2) Conclusions

The operations associated with the receipt of shipping containers were conducted in a safe manner. Radiological surveys were adequate for determining if contamination and radiation levels were within the allowable limits, and the required labels/markings were applied to the incoming cylinders.

c. **Certificates of Compliance (R4.04)**

(1) Inspection Scope and Observations

The inspectors verified that the Certificates of Compliance (CoC) were maintained current in compliance with the requirements in 10 CFR Part 71. The inspectors selected four different shipments involving domestic and international shipments for verification that the shipments were made using containers with the current NRC CoC. Documentation indicated that the selected CoCs were current and approved by letter from NRC. In addition, the inspectors reviewed the status of containers utilized in the transport of material associated with BLEU operations. The inspectors determined that a CoC for the oxide powder transport unit referred to as "OPTU" was approved by letter dated March 22, 2004, but the OPTU shipping container was not included in the procedure governing shipping container maintenance and repair (SOP-40072 or P43, 101 "Shipping Container Maintenance and Repair"). In response, the licensee indicated that the procedure was being revised to include the OPTU container but was incomplete at the time of the inspection. The licensee also indicated that the container CoC for shipping fuel assemblies for the BLEU facility was pending approval. The inspectors reviewed documentation and interviewed personnel involved with performing the periodic maintenance on UF₆ cylinders. No issues were identified and cylinders were maintained and recertified at the required frequency.

(2) Conclusions

Based on interviews and documentation, current Certificates of Compliance were on file for all containers in use, and selected containers were maintained in accordance with the respective Certificate.

d. **Management Controls (R4.05)**

(1) Inspection Scope and Observations

The inspectors reviewed the licensee's management controls for ensuring that transportation activities were being conducted in accordance with requirements, and that issues were properly identified, tracked, and resolved. The inspectors reviewed

licensee procedures and instructions which detailed the activities associated with transportation of radioactive materials and determined that the procedures were both user friendly and included guidance to ensure that transportation personnel were performing activities in accordance with requirements. The inspectors discussed with transportation management personnel and verified via review of documentation dated August 24, 2004, that recent changes to NRC and DOT regulations which became effective October 1, 2004, had been incorporated in the appropriate procedures (container labeling/markings, shipping names, et.al.). No issues were identified.

On an annual basis, the licensee conducted an audit of the shipping and handling program. The most recent audit was performed during the period December 15, 2003 through February 6, 2004. The audit was a detailed and comprehensive assessment of the program. The audit findings, observations, and comments were appropriately dispositioned and tracked for resolution via the site web based tracking program. According to an interviewee, reports of overdue items are provided each week to plant management for review and follow up.

(2) Conclusions

Based on the annual program audits, and management approved instructions and procedures, a management control program was in place for ensuring that transportation activities were conducted in accordance with requirements.

4. Exit Interview

The inspection scope and results were summarized with licensee management on October 22 and 27, 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.

ATTACHMENT

1. PARTIAL LIST OF PERSONS CONTACTED

Licensee

*M. Berger, Supervisor, Nuclear Material Shipping and Receiving
*J. Davis, Principal Engineer, Environmental, Health, Safety and Licensing
J. DeRos, Technician, Transportation Operations
H. Ford, Senior Technician, Transportation Operations
R. Gentz, Transportation Analyst, Environmental, Health, Safety and Licensing
*R. Land, Site Manager
*R. Link, Manager, Environmental, Health, Safety and Licensing
*J. Luebke, Principal Engineer
*L. Maas, Manager, Licensing and Compliance
*C. Manning, Manager, Criticality Safety
*C. Perkins, Manager, Operations
H. Welker, Supervisor, Electrical Instruments
K. Westerfield, Logistic Analyst

*Attended exit meeting

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

2. INSPECTION PROCEDURES USED

IP 86740 Inspection of Transportation Activities
IP 88005 Management Organization and Controls
IP 88020 Regional Nuclear Criticality Safety Inspection Program

3. LIST OF ITEMS OPENED, CLOSED, AND DISCUSSED

<u>Item Number</u>	<u>Status</u>	<u>Type</u>	<u>Description</u>
70-1257/04-05-01	Open	VIO	Failure to review and approve a modified procedure prior to use (Paragraph 2.b).
70-1257/04-05-02	Open	NCV	Failure to adequately test HEPA filter prior to operations (Paragraph 2.e).

4. LIST OF ACRONYMS USED

ADAMS	Agency-Wide Document Access Management System
BLEU	Blended Low Enriched Uranium
CFR	Code of Federal Regulations
CoC	Certificates of Compliance
DCF	Dry Conversion Facility
ECN	Engineering Change Notice
DOT	Department of Transportation
HEPA	High Efficiency Particulate Air
IP	Inspection Procedure
IR	Inspection Report
IROFS	Item Relied On For Safety
ISA	Integrated Safety Analysis
NCV	Non-Cited Violation
NRC	Nuclear Regulatory Commission
OPTU	Oxide Powder Transport Unit
PARS	Publicly Available Records System
PIN	Plant Identification Number
SOP	Standard Operating Procedure
UF ₆	Uranium Hexafluoride