



UNITED STATES
NUCLEAR REGULATORY COMMISSION

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

May 24, 2005

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

SUBJECT: NRC INSPECTION REPORT NO. 70-1257/2005-002

Dear Mr. Land:

This report refers to the inspection conducted from April 19 through 28, 2005, 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 those members of your staff identified in the report.

Areas examined during the inspection were emergency preparedness, environmental protection, waste management, radioactive waste generator requirements, low-level radioactive waste storage, fire safety and the status of open items from a previous inspection. The inspection consisted of selective examinations of procedures and representative records, interviews with personnel, and observation of activities in progress. No violations were 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: NRC Inspection Report

cc w/encl:

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 PUBLIC

***see previous concurrence**

X SISP REVIEW COMPLETE: Initials: DAA SISP REVIEW PENDING*: Initials: _____ *Non-Public until the review is complete

X PUBLICLY AVAILABLE NON-PUBLICLY AVAILABLE SENSITIVE X NON-SENSITIVE

ADAMS: Yes ACCESSION NUMBER: _____

OFFICE	RII:DFFI	RII:DFFI	RII:DFFI	RII:DFFI	RII:DFFI		
SIGNATURE	AG for 5/19/05	/RA/	/RA/	/RA/	MC 5/19/05		
NAME	WBritz	RGibson	AGooden	SCaudill	MCrespo		
DATE	05/ /2005	05/20/2005	05/20/2005	05/20/2005	5/ /2005	5/ /2005	5/ /2005
E-MAIL COPY?	YES NO	YES NO	YES NO	YES NO	YES NO	YES NO	YES NO

U. S. NUCLEAR REGULATORY COMMISSION

REGION II

Docket No.: 70-1257

License No.: SNM-1227

Report No.: 70-1257/2005-002

Licensee: Framatome ANP, Inc.

Facility: Richland Facility

Location: Richland, Washington

Dates: April 19-28, 2005

Inspectors: W. Britz, Fuel Facility Inspector
S. Caudill, Senior Fuel Facility Inspector
M. Crespo, Fuel Facility Inspector
R. Gibson, Fuel Facility Inspector
A. Gooden, Senior Fuel Facility Inspector

Accompanying Personnel: J. Henson, Chief
Fuel Facility Inspection Branch 2
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, Inc.
NRC Inspection Report 70-1257/2005-002

This routine, announced inspection was conducted in the areas of emergency preparedness, environmental protection, waste management, radioactive waste generator requirements, low level waste storage, fire protection and the status of open items from a previous inspection. The inspection involved observation of work activities, a review of selected records, interviews with plant personnel, and the observation and evaluation of an emergency preparedness exercise. The inspection identified the following aspects of the licensee programs as outlined below:

Emergency Preparedness

- The scenario details provided a realistic set of conditions for evaluating the onsite response capability and the state of readiness for responding to incidents. The plant emergency response organization successfully managed the simulated accident and demonstrated that previous response deficiencies identified in October 2003 (Inspection Report No. 70-1257/2003-09) were fully resolved. Emergency communications and timely reporting of environmental sampling data were areas for improvement (Paragraph 2.b).

Environmental Protection

- The licensee's environmental monitoring program was implemented in accordance with the license requirements. Environmental sampling results for forage, soil and ambient air since the last inspection showed uranium and fluoride activities near background levels in the environment (Paragraph 3.a.(2)).
- An acceptable quality control program was maintained for analytical measurements of environmental samples (Paragraph 3.b.(2)).
- The environmental audit program was consistent with the requirements specified in Section 2.6.4 of the license application. The environmental program audits were thorough and corrective actions were tracked to resolution (Paragraph 3.c.(2)).

Waste Management

- The licensee continues to characterize the lagoons' liners, sand, and soil for processing in accordance with the closure plans. The lagoons are scheduled for completion and final release by August 2006 in accordance with the agreement with the State of Washington (Paragraph 4.a.(2)).
- The gaseous effluent monitoring program was effective in controlling and measuring effluents, and compliant with the requirements of the license. The effluent air sampling equipment, including the sample delivery lines, had been properly maintained. Calculated offsite doses were below regulatory limits (Paragraph 4.b.(2)).

- The liquid effluent program effectively maintained effluent concentrations below the limits specified in the license. The licensee notified the NRC for information that on August 14, 2004, and on March 8, 2005, release of chemical wastes to the sanitary sewer exceeded the daily limits for nitrate and ammonia in accordance with the state permit (Paragraph 4.c.(2)).

Radioactive Waste Generator Requirements

- The radioactive waste shipment tracking system records and waste shipment manifests were complete and accurate. The program for the disposal of low-level radioactive waste was compliant with regulatory requirements. The licensee's programs and procedures for maintaining control and quality assurance of radioactive waste shipments were found to be adequate (Paragraph 5.b).

Low-level Radioactive Waste Storage

- Low-level radioactive waste was stored in accordance with regulatory requirements. The waste storage facilities and activities were found in compliance with applicable license and regulatory requirements (Paragraph 6.b).

Fire Safety

- No changes in management or support personnel had taken place since the previous inspection. The audits and maintenance of the fire protection systems were being conducted as required. The inspection of the fire protection systems, equipment, fire and hydrogen detectors, inspection tags, and postings appeared adequate (Paragraph 7.a.(2)).
- The site hazard analyses, the Pre-Fire Plan, and the completed fire protection system installation in the blended low enriched uranium (BLEU) facility and the solid waste uranium recovery facility were found to be adequate (Paragraph 7.b.(2)).
- Fire protection services were provided by the City of Richland with immediate action and further support from licensee personnel. Drills were conducted and training provided for onsite and offsite response personnel (Paragraph 7.c.(2)).

Follow-up on Previously Identified Issues

- The corrective actions to resolve two previous inspection findings were reviewed and considered adequate for closure of previous findings (Paragraph 8.b).

Attachment:

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

REPORT DETAILS

1. Summary of Plant Status

During the inspection period there were no plant upsets. All operations were normal.

2. Emergency Preparedness (88050) (F3.05)

a. Scope and Observations

Section 7.3.2 of the Emergency Plan (EP) required that a major exercise shall be conducted every other year to test one or more significant components of the EP. The exercise was conducted on April 20, 2005, in fulfillment of Section 7.3.2 of the Plan. The licensee submitted in advance of the exercise date the final details on the exercise scenario, scope, and objectives for NRC review. The performance of the Plant Emergency Response Management Team (PERMT) and Plant Emergency Response Team (PERT) in responding to the simulated emergency and the critique to self-identify areas of improvement were evaluated. The inspectors observed the licensee's response to the simulated emergency at the incident scene, the Incident Command Post, the Emergency Operations Center (EOC), and offsite environmental monitoring locations.

The exercise scenario simulated a release of radioactive material from the Dry Conversion Facility (DCF) exhaust duct system. The simulated release resulted from human error. The scenario was realistic, and the simulated conditions were adequate for evaluating the licensee's ability to respond to a radiological emergency.

Offsite exercise participants included Benton County Emergency Management, Franklin County Emergency Management, State of Washington Emergency Management and Department of Health, and the Nuclear Regulatory Commission. The licensee's response to manage the postulated accident was considered successful. The emergency classification was timely, notifications to offsite authorities were completed within the required time limits, the initial protective action recommendations based on accident conditions were correct, and frequent discussions were observed between the Incident Commander and the EOC. The licensee conducted a critique following the exercise which afforded players, controllers, evaluators, and observers an opportunity to provide comments. Areas were discussed for improvements. No response weaknesses or deficiencies were identified during the NRC critique, but the following observations were made in the areas of communications and PERT response:

- Following the Site Area Emergency notification to the Department of Energy, no further updates or plant status information was provided by the licensee until the exercise termination message more than two hours later.
- Instructions provided to the plant re-entry team by the EOC regarding the DCF exhaust duct filter system resulted in a delay of approximately 13 minutes before the details needed by the accident assessment group were available.

- The event notification message form to NRC Operations Center properly identified the event but failed to include sufficient details regarding the contamination event (e.g. number of victims, contamination levels, etc.).
- The PERT Health and Safety Technicians collecting the environmental samples were slow in providing data back to the EOC.
- The site maps located inside the EOC were not frequently updated for plume tracking to provide an immediate sense of areas impacted during the release.

In response to the above observations, the licensee indicated that the items would be reviewed for taking actions as appropriate. The licensee was informed that corrective actions taken in response to critique comments would be reviewed during a subsequent inspection and was considered as an inspector followup item (IFI 70-1257/2005-02-01: Review and verify appropriate actions taken to improve communications and timely sample reporting).

b. Conclusion

The scenario details provided a realistic set of conditions for evaluating the onsite response capability and the state of readiness for responding to incidents. The plant emergency response organization successfully managed the simulated accident and demonstrated that previous response deficiencies identified in October 2003 (Inspection Report No. 70-1257/2003-09) were fully resolved. Emergency communications and timely reporting of environmental sampling data were areas for improvement.

3. **Environmental Protection (IP 88045) (R2)**

a. Monitoring Program Implementation and Results (R2.06)

(1) Scope and Observation

The inspectors reviewed selected portions of the licensee's environmental program to verify that environmental monitoring was implemented in accordance with the license requirements and verify the licensee's capabilities to measure and assess environmental radiological contamination as a result of plant operations.

The inspectors reviewed selected environmental sampling results from soil, ambient air and forage collected since the last inspection. The licensee was required to perform monthly and quarterly uranium analyses on the soil and fluoride analyses for air and forage samples. The inspectors determined that the sample results were consistently well below the licensee's action levels. The environmental sampling results reviewed by the inspectors for forage, ambient air and soil showed uranium and fluoride activities near background levels in the environment. The inspectors also reviewed the waste effluent monitoring

and sampling for the wastes to the Richland Wastewater Treatment Facility, and sludge and effluent sampling results for the City of Richland sewer system. There were no significant changes in the results of uranium in the sanitary sewage system.

The inspectors toured the environmental monitoring locations as specified in the license application. The sample locations were consistent with license requirements. During this inspection, the licensee was not scheduled to collect either soil, forage or ground water samples; however, the inspectors were able to observe the collection of a daily composited sample for the liquid waste from the sanitary sewage system and three daily ambient air samples from three monitoring locations. Released liquid wastes were combined and discharged to the licensee's lift station where the total combined liquid effluent from the plant was pumped to the Richland Municipal Sewerage System. The combined liquid effluent was continuously sampled at the licensee's effluent station and the flow measured at the lift station.

(2) Conclusion

The licensee's environmental monitoring program was implemented in accordance with the license requirements. Environmental sampling results for forage, soil and ambient air since the last inspection showed uranium and fluoride activities near background levels in the environment.

b. Quality Control of Analytical Measurements (R2.03)

(1) Scope and Observation

The inspectors reviewed the licensee's quality control program for environmental samples.

The inspectors reviewed selected environmental monitoring and sampling procedures of the environmental program and verified that there were no significant changes to the procedures since the last inspection. The inspectors also verified that the licensee had an adequate chain of custody process in place for environmental samples. Procedures reviewed by the inspectors were Standard Operating Procedure (SOP) 40034 - Health Physics and Radiological Safety Procedures (Surface Soil Sampling), SOP 40035 - Forage Sampling, and SOP 40036 - Ambient Air Sampling for Fluorides.

(2) Conclusion

The licensee maintained an acceptable quality control program for analytical measurements of environmental samples.

c. Environmental Program Audit Review (R2.02)

(1) Scope and Observations

The inspectors reviewed the licensee's environmental program audits since the last inspection (June 2004).

The licensee's environmental audit program was reviewed and was consistent with the license application. Specifically, the inspectors reviewed the Semi-Annual Audit Summary dated November 8, 2004 and Quarterly Environmental Audits from June 14, 2004 to April 14, 2005. The inspectors noted that the audits were appropriately distributed to ensure that they received the appropriate management review. The environmental program audits were thorough and corrective actions were tracked to resolution.

(2) Conclusion

The environmental audit program was consistent with the requirements specified in Section 2.6.4 of the license application. The environmental program audits were thorough and corrective actions were tracked to resolution.

4. Waste Management (IP 88035) (R3)

a. Processing the Lagoons (R3.06)

(1) Scope and Observations

The inspectors reviewed the closure plan dated February 11, 2005, and the licensee's characterization of the liners, soil, and sand from the lagoons. In accordance with the consent decree with the State of Washington, the licensee is scheduled to complete deconstruction of the lagoons for final release by August 2006.

The inspectors toured the lagoons and observed the licensee removing characterized clean sand from lagoon four. At lagoon one, the licensee was characterizing the liner above the sand for removal, and lagoons two and three were used for pumping rain water from the other lagoons. From the characterization, the licensee was determining the uranium and fluoride contents in the lagoons. A portable Iso-scan cart with a germanium detector was used by the licensee to scan the debris and liners from the lagoons in order to separate the contaminated waste from the industrial waste. Lagoons 5A and 5B were still in the final stages of clean up for final characterization in accordance with the closure plan. The lagoons are scheduled in accordance with the closure plan to be backfilled with soil after they have been free released. Procedures reviewed by the inspectors were SOP 40380 - Lagoon Closure Operations and SOP 40185 - Lagoons, Ammonia and Uranium Recovery.

The inspectors reviewed the licensee's events tracking system (Condition Report: FA EHS&L Condition) and determined that an event occurred on February 4, 2005, in that, a big gust of wind picked up several large pieces of lagoon liners and carried them over the fence, contaminating parked trailers, the asphalt and a guardrail. In response to this event, Condition Report Number 2005-519 was entered into the event tracking system. Health and Safety Technicians (HSTs) surveyed the areas, cleaned and deconned the affected area, and removed the contaminated asphalt. The contaminated liners were properly removed and controlled by HSTs. The inspectors reviewed the survey results and determined that the area was adequately surveyed and released by HST. The removed asphalt was backfilled with soil.

(2) Conclusion

The licensee continued to characterize the lagoons for deconstruction in accordance with the closure plans. The lagoons were scheduled for closure by August 2006 in accordance with the agreement with the State of Washington.

b. Airborne Effluent Program Controls, Instrumentation, Ventilation, and Airborne Effluent Monitoring Results (R3.02)

(1) Scope and Observations

The inspectors examined selected stack effluent sampling stations at the Ammonium Recovery Facility (ARF) and the Engineering Laboratory Operation Facility (ELOF) to ensure that equipment was properly maintained and representative samples were being collected. The inspectors reviewed the airborne effluent monitoring results to verify that releases were within license application limits.

The inspectors observed an HST collect daily air particulate filter samples from stacks K-25, K-46, K-56, K-47 and K-67. The stack samples were taken properly by the HST in accordance with the SOP. No significant changes to the procedure or the program were noted since the last inspection. The stainless steel enclosures used to protect the sampling equipment from environmental conditions and polyethylene and stainless steel sample delivery lines with quick connect were in good condition with no signs of damage or corrosion.

The stack sampling results and quantities of airborne radioactive materials released for the period June 1, 2004 to April 6, 2005, and the semiannual effluent release reports to the NRC for the second six months of 2004 were reviewed. The total dose from the gaseous effluent was 1.03 E-4 millirem (mrem) for calendar year (CY) 2004. The calculated offsite doses for gaseous effluents were well below 10 CFR Part 20 constraint level of 10 millirem per year.

(2) Conclusion

The gaseous effluent monitoring program was effective in controlling and measuring effluents, and compliant with the requirements of the license. The effluent air sampling equipment, including the sample delivery lines, had been properly maintained. Calculated offsite doses were well below regulatory limits.

c. Liquid Effluent Monitoring Results (R3.01)

(1) Scope and Observation

The inspectors reviewed the liquid effluent monitoring data for the facilities, in order to verify that releases were compliant to the limits specified in the license application requirements. The liquid effluent activity was 111 micro curies (uCi) for technetium-99 and 28 uCi for uranium in CY 2004. The reported liquid releases in the sewer effluent to the City of Richland for CY 2004, were below the applicable limits in 10 CFR Part 20, Appendix B. The inspectors concluded that the licensee's liquid effluents monitoring programs were effective in controlling and measuring effluents, and met the requirements of the license.

Section 5.1.2.3 of the SNM license required the licensee to notify the NRC for informational purposes of any occurrences which, by permit, required reporting to the authorities of the release of chemical wastes to the sanitary sewer system. On August 14, 2004, the licensee's daily maximum nitrate limit of 1300 pounds was exceeded, and on March 8, 2005, the licensee's daily maximum ammonia limit of 125 pounds was also exceeded.

(2) Conclusion

The liquid effluent program effectively maintained effluent concentrations below the limits specified in the license. The licensee notified the NRC by letter that on August 14, 2004, and on March 8, 2005, release of chemical wastes to the sanitary sewer exceeded the effluent permit daily limits for nitrate and ammonia.

5. Waste Generator Requirements (IP 84850) (R6)

a. Scope and Observations

The inspectors reviewed the licensee's program for preparing waste shipping manifests, and tracking waste shipments, and verified that the licensee had established and maintained adequate management controls of procedures and processes to ensure compliance with the requirements of 10 CFR Part 20, Appendix G, and 10 CFR 61.55 and 61.56.

The inspectors reviewed the licensee's procedures, shipping manifests, and files to determine compliance. Shipment records for solid waste disposals of non-compacted and compacted solid waste (non-recoverable) to a licensed waste burial facility for the period June 2004 to April 2005, provided an acceptable level of information in order to

determine radioactive nuclide quantities. The documentation for radioactive waste shipped for the period June 2004 to April 2005 was complete and met the applicable requirements of 10 CFR Part 20, Appendix G, and 10 CFR 61.55 and 61.56. A procedure and program were in place to track waste shipments. The waste shipment tracking log was current including the acknowledgment of waste receipt.

The inspectors reviewed the Quarterly Radioactive Waste Handling Audits that included a checkoff list of areas inspected by the licensee and issues found. The corrective actions for issues identified in the audits were adequately addressed. The inspectors had no issues with the management, record keeping and quality control of waste shipments.

b. Conclusion

The radioactive waste shipment tracking system records and waste shipment manifests were complete and accurate. The program for the disposal of low-level radioactive waste was compliant with regulatory requirements. The licensee's programs and procedures for maintaining control and quality assurance of radioactive waste shipments were found to be adequate.

6. Low-level Radioactive Waste Storage (IP 84900) (R5)

a. Scope and Observations

The low level radioactive waste (LLRW) storage management program was reviewed for adequacy of proper storage area, waste container integrity, and the safe shipment, processing, and disposal of LLRW. The waste tracking system was also reviewed for completeness and adequacy.

The inspectors toured the radioactive material and waste storage areas and observed storage of non-recoverable LLRW in 55 gallon drums for compacted shipment and offsite disposal. The waste containers were labeled properly and no significant container degradation or posting discrepancies were observed. The waste storage database and the storage areas provided an accurate description and location of the waste. As of March 2005, the licensee's radioactive waste volume had increased to 25,500 cubic feet from the 21,900 cubic feet of the last inspection. The inspectors determined that the increase in the waste volume was due to no operation of the incinerator since June 2004 and radioactive waste generated from the lagoons and the final stages of the Phase II operation of the Best Practice Lines Facility reconfiguration. The licensee expected to start operating the incinerator again by September 2005. No discrepancies were identified.

b. Conclusion

Low-level radioactive waste was stored in accordance with regulatory requirements. The waste storage facilities and activities were consistent with applicable license and regulatory requirements.

7. **Fire Safety (IP 88055) (O4)**

- a. Fire Protection Program Management/Organization (O4.01)
Review of Documentation Related to the Fire Protection Program, Insurer's Audits and Safety Committee (O4.02)
Fire Safety of Processes, Equipment, and Storage Areas (O4.04)
Fire Protection Systems (O4.05)

(1) Scope and Observations

The inspectors reviewed changes to the fire protection program organization, the documentation related to the fire protection program, and the processes, equipment, and storage areas concerning fire protection. The inspectors discussed the program with the management and maintenance personnel who inspect and service the fire equipment. There had been no changes in management or support personnel since the last inspection and no significant issues identified.

The inspectors reviewed the documentation of the fire protection program in the license conditions, safety demonstration, safety manual, and operating procedures. The inspectors reviewed the audits performed on the fire protection program. The licensee was self-insured and thus there were no insurance audits. An audit performed on the fire safety program by the Nuclear Service Organization was reviewed. The inspection form employed by the Richland Fire & Emergency Services Department for their June 2004 inspection was reviewed. The inspectors reviewed the monthly safety inspections for 2005 required by License Condition 2.6.3, *Fire Protection*. The audits were established in the preventive maintenance system since the previous inspection. The inspectors reviewed other preventive maintenance and tests performed on the fire protection systems. The audits and maintenance of the fire protection systems had been conducted as required.

The inspectors toured and inspected fire systems and equipment in the Uranium Dioxide (UO₂) Building, DCF, the base and acid storage buildings, and other storage facilities. The fire protection systems, equipment, fire and hydrogen detectors, inspection tags, and postings appeared adequate.

(2) Conclusion

No changes in management or support personnel had taken place since the previous inspection. The audits and maintenance of the fire protection systems were being conducted as required. The inspection of the fire protection systems, equipment, fire and hydrogen detectors, inspection tags, and postings appeared adequate.

b. Building Design, Construction, and Ventilation System (O4.03)
Fire Hazard Analysis (O4.06)
Pre-Fire Plan (O4.07)

(1) Scope and Observations

The inspectors toured and observed the completed construction of the BLEU facility including the installation of the hydrogen and fire detectors and other fire prevention equipment. The addition of a sprinkler system for the solid waste uranium recovery (SWUR) incinerator facility was inspected. The inspectors reviewed the engineering change notice packages for the new construction and equipment. The packages included design specifications for fire code compliance. The inspectors had no issues with the fire protection system installation and equipment.

The inspectors reviewed the fire hazard analyses, reviewed the fire hazards section of the integrated safety analyses summary and the Pre-Fire Plan. The inspectors had no issues with the hazard analyses. The Pre-Fire Plan section of EMF-32, *Emergency Plan*, was reviewed and determined to provide a detailed description of the buildings and the facility layout. The inspectors noted that the Pre-Fire Plan did not yet contain the addition of the BLEU facility. The Richland Fire Department had copies of the Pre-Fire Plan for their review when responding to events at the licensee's facilities.

(2) Conclusion

The inspectors had no issues with the site hazard analyses, the Pre-Fire Plan, or the completed fire protection system installation in the BLEU facility and the solid waste uranium recovery facility.

c. Fire Brigade Training (O4.08)
Fire Emergency Drills (O4.09)
Off Site Support (O4.10)

(1) Scope and Observations

The inspectors reviewed onsite and offsite support for fire protection. The licensee's onsite fire fighting capability is limited to small incipient fires. Fire protection services are provided by the City of Richland with support and the initial response to fire provided by onsite personnel. The inspectors accompanied a fire inspector from the City of Richland Fire Department as he conducted a routine fire inspection of several site buildings.

The inspectors reviewed the training records for training provided to onsite and offsite responders. The inspectors also discussed with the licensee contact management support and training provided to the Richland Fire Department Chief and their personnel. The inspectors reviewed the records of the drills conducted.

(2) Conclusion

Fire protection services were provided by the City of Richland with immediate action and further support from licensee personnel. Drills were conducted and training was provided for onsite and offsite response personnel. No issues were identified.

8. Follow-up on Previously Identified Issues (O3.12)

a. Scope and Observations

The inspectors reviewed the corrective actions taken by the licensee to resolve two issues from previous inspections.

Violation (VIO) 70-1257/2004-05-01 - Failure to Review and Approve a Modified Procedure Prior to Use. The inspector reviewed the licensee's actions to address the notice of violation involving field changes to a procedure data form without management approval. The inspector noted that the licensee's corrective actions involved an evaluation of the form tracking system, "Olympus." Following this review, it was decided that data forms from procedures would be incorporated into the licensee's procedure management system, "Documentum." This modification required that data forms proceed through a more rigorous screening and approval process. The modification also gave the advantage of having the form more easily retrievable for operators. The inspector had no issues with actions performed by the licensee to address the issue, therefore VIO 70-1257/2004-05-01 was closed.

Non-cited Violation (NCV) 70-1257/2004-05-02 - Failure to Adequately Test High Efficiency Particulate Air (HEPA) Filter Prior to Operations. The inspector reviewed the licensee's actions to address the NCV involving the failure to properly test a HEPA filter, which was a license condition, prior to restarting operations in the ceramics area. The licensee had modified the procedure to correct the testing error and ensure the equipment tester was aware that the process equipment could not be restarted without a successful test. The inspector had no issues with actions performed by the licensee to address the issue, therefore NCV 70-1257/2004-05-02 was closed.

b. Conclusion

Based on the licensee's corrective actions to address the issues, both issues were considered resolved.

9. Exit Meeting

The biennial exercise scope and results were discussed on April 21, 2005, and the balance of the inspection scope and results were summarized with licensee management on April 28, 2005, as indicated in the Attachment. Although proprietary documents were reviewed during this inspection, the proprietary nature of these documents have been deleted from this report. No dissenting comments were received from the licensee.

ATTACHMENT

1. **PARTIAL LIST OF PERSONS CONTACTED**

Licensee

- *#R. Burklin, Manager, Radiation Protection
- *#V. Gallacher, Manager, Chemical and Waste Operations
- *#R. Land, Site Manager
- *R. Link, Manager, Environmental, Health, Safety and Licensing
- *#C. Manning, Manager, Nuclear Criticality Safety
- #L. Maas, Manager, Licensing and Compliance
- *J. Payne, Manager, Technical Support and Maintenance
- *#C. Perkins, Manager, Operations
- *#T. Probasco, Manager, Safety, Security, and Emergency Preparedness
- *#T. Tate, Supervisor, Radiological Safety
- #E. VanderVeer, Supervisor, Chemistry and Waste

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

*Attended exit meeting on April 21, 2005

#Attended exit meeting on April 28, 2005

2. **INSPECTION PROCEDURES USED**

IP 84850	Waste Generator Requirements
IP 84900	Low-level Radioactive Waste Storage
IP 88020	Plant Operations
IP 88035	Waste Management
IP 88045	Environmental Protection
IP 88050	Emergency Preparedness
IP 88055	Fire Safety

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

<u>Item Number</u>	<u>Status</u>	<u>Type</u>	<u>Description</u>
70-1257/2005-02-01	Open	IFI	Review and verify appropriate actions taken to improve emergency communications and timely sample reporting (Paragraph 2.a).
70-1257/04-05-01	Closed	VIO	Failure to review and approve a modified procedure prior to use (Paragraph 8.b).
70-1257/04-05-02	Closed	NCV	Failure to adequately test HEPA filter prior to operations (Paragraph 8.b).

4. LIST OF ACRONYMS USED

ADAMS	Agency-Wide Document Access Management System
ALARA	As Low As Reasonable Achievable
ARF	Ammonium Recovery Facility
BLEU	Blended Low Enriched Uranium
CFR	Code of Federal Regulations
CY	Calendar Year
DCF	Dry Conversion Facility
EHS	Environmental Health & Safety
ELOF	Engineering Laboratory Operation Facility
EOC	Emergency Operations Center
EP	Emergency Plan
HEPA	High Efficiency Particulate Air
HST	Health and Safety Technician
IFI	Inspector Followup Item
IP	Inspection Procedure
LLRW	Low-Level Radioactive Material
uCi	Micro-Curie
mrem	Milli-Rem
NCV	Non-Cited Violation
NRC	Nuclear Regulatory Commission
PARS	Publicly Available Records System
PERT	Plant Emergency Response Team
PERMT	Plant Emergency Response Management Team
SNM	Special Nuclear Material
SOP	Standard Operating Procedure
SWUR	Solid Waste Uranium Recovery
UO ₂	Uranium Dioxide
VIO	Violation