



**UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION II  
SAM NUNN ATLANTA FEDERAL CENTER  
61 FORSYTH STREET, SW, SUITE 23T85  
ATLANTA, GEORGIA 30303-8931**

July 29, 2005

Mr. David Edwards  
Plant Manager  
Honeywell Specialty Chemicals  
P.O. Box 430  
Metropolis, IL 62690

SUBJECT: NRC INSPECTION REPORT 40-3392/2005-003 AND NOTICE OF VIOLATION

Dear Mr. Edwards:

This letter refers to the inspections conducted on June 20 - 24, and June 27 - 30, 2005, at the Honeywell Specialty Chemicals facility. The purpose of these inspections was to perform a routine review of the implementation of the chemical safety, fire safety, training, management controls, and waste generator programs and to determine whether activities authorized by the license were conducted safely and in accordance with NRC requirements. At the conclusion of the inspections on June 24 and 30, 2005, the findings were discussed with those members of your staff identified in the enclosed report.

The inspections consisted of an examination of activities conducted under the license as they relate to safety and compliance with the Commission's rules and regulations and with the conditions of the license. Areas examined during the inspections are identified in the enclosed report. Within these areas, the inspections consisted of a selective examination of procedures and representative records, observations of activities in progress, and interviews with personnel.

Based on the results of these inspections, the NRC has determined that a Severity Level IV violation of NRC requirements occurred. The violation was evaluated in accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG 1600, which is included on the NRC's web site at <http://www.nrc.gov/what-we-do/regulatory/enforcement.html>. The violation is cited in the enclosed Notice of Violation (Notice), and the circumstances surrounding the violation are described in the subject inspection report. The violation involves the failure to perform periodic reviews of standard operating procedures in a timely manner.

You are required to respond to this letter and should follow the instructions specified in the enclosed Notice when preparing your response. The NRC will use your response, in part, to determine whether further enforcement action is necessary to ensure compliance with regulatory requirements.

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 NRC's document system (ADAMS), accessible from

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the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>. To the extent possible, your response should not include any personal privacy, proprietary, or safeguards information so that it can be made available to the Public without redaction.

Should you have any questions concerning this letter, please contact us.

Sincerely,

Deborah Seymour for */RA/*

Jay L. Henson, Chief  
Fuel Facility Inspection Branch 2  
Division of Fuel Facility Inspection

Docket No. 40-3392  
License No. SUB-526

Enclosures: 1. Notice of Violation  
2. NRC Inspection Report 40-3392/2005-003

cc w/encls:  
Gary Wright  
Emergency Management Agency  
Division of Nuclear Safety  
1035 Outer Park Dr., 5<sup>th</sup> Floor  
Springfield, IL 62704

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- M. Raddatz, NMSS

SISP REVIEW COMPLETE: Initials: DAS     SISP REVIEW PENDING\*: Initials: \_\_\_\_\_    \*Non-Public until the review is complete

PUBLICLY AVAILABLE     NON-PUBLICLY AVAILABLE     SENSITIVE     NON-SENSITIVE

ADAMS:  Yes    ACCESSION NUMBER: \_\_\_\_\_

OFFICE	RII:DFFI	RII:DFFI	RII:DFFI	RII:DFFI	RII:DFFI	
SIGNATURE	Dhartland for	Dhartland for	DHartland	DHartland	<i>/RA/</i>	
NAME	M. Crespo	N. Rivera	J. Jimenez	W. Britz	D. Hartland	
DATE	07/29/2005	07/29/2005	07/29/2005	07/29/2005	August 1, 2005	August 1, 2005
E-MAIL COPY?	YES NO	YES NO	YES NO	YES NO	YES NO	YES NO

## NOTICE OF VIOLATION

Honeywell Specialty Chemicals  
Metropolis, Illinois

Docket No. 40-3392  
License No. SUB-526

During an NRC inspection conducted on June 27 through 30, 2005, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG-1600, the violation is listed below.

License Condition 10 of NRC License No. SUB-526, Amendment No. 15, authorizes, in part, the use of licensed materials in accordance with the statements, representations, and conditions in Chapters 1 through 7 of the license application dated January 30, 2003.

Chapter 2, Section 2.6 of the license application, dated January 30, 2003, requires that "plant written procedures shall be reviewed, revised, approved, and implemented in accordance with Plant Policy titled "Procedure Control Policy."

Procedure Control Policy, AD-7, issue date October 11, 2004, states, in part, that procedures written after March 1, 2004, shall be reviewed, revised, approved, and implemented in accordance with Procedure MTW-ADM-PRO-0103, "Development and Implementation of Plant Technical Procedures."

Step 4.25.2 of Procedure MTW-ADM-PRO-0103, Revision 5, requires that if a procedure is extended beyond the periodic review date, it be removed from use and immediately placed into the periodic review cycle.

Contrary to the above, as of June 28, 2005, the inspectors identified that several standard operating procedures written after March 1, 2004, were not removed from service and immediately placed into the periodic review cycle after an extension for their periodic review expired on June 15, 2005.

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

Pursuant to the provisions of 10 CFR 2.201, Honeywell Speciality Chemicals 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: (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.

Enclosure 1

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 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 safeguard's 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 29 day of July, 2005

U.S. NUCLEAR REGULATORY COMMISSION

REGION II

Docket No.: 40-3392

License No.: SUB-526

Report No.: 40-3392/2005-003

Licensee: Honeywell International, Inc.

Facility: Metropolis Works

Location: P. O. Box 430  
Metropolis, IL 62960

Dates: June 20 through 24, and June 27 through 30, 2005

Inspectors: Wayne L. Britz, Fuel Facility Inspector  
Manuel G. Crespo, Fuel Facility Inspector  
Jose G. Jimenez, Fuel Facility Inspector  
Nilda S. Rivera Feliciano, Fuel Facility Inspector

Approved by: Jay L. Henson, Chief  
Fuel Facility Inspection Branch 2  
Division of Fuel Facility Inspection

## EXECUTIVE SUMMARY

Honeywell International, Inc.  
NRC Inspection Report 40-3392/2005-003

The purpose of this inspection was to perform a routine review of the implementation of the chemical safety, fire safety, training, management controls, and waste generator programs. The inspection involved observation of work activities, a review of selected records, and interviews with plant personnel. The inspection identified the following aspects of the program as outlined below:

### Chemical Safety

- The licensee's process hazard analysis adequately reflected the existing plant configuration (Paragraph 2.a).
- The licensee had an adequate program for chemical safety training (Paragraph 2.b).
- The licensee was implementing an adequate emergency response program for chemical emergencies (Paragraph 2.c).
- The licensee was adequately controlling corrective maintenance work and performed preventative maintenance and inspection activities on critical equipment at the appropriate frequency (Paragraph 2.d).
- The licensee was implementing an adequate incident investigation, audit, and inspection program (Paragraph 2.e).
- The licensee was implementing appropriate actions to address the recommendations provided in Information Notices 87-026 and 99-003 (Paragraph 2.f).

### Management Organization and Controls

- The new plant manager and maintenance manager met the education and experience requirements specified in the license application (Paragraph 3.a).
- A violation was identified for failure to remove several standard operating procedures from service and immediately place into the periodic review cycle after an extension for the periodic review expired (Paragraph 3.b).
- Health physics audits were documented and conveyed to management, and findings were resolved in a timely manner (Paragraph 3.c).

### Operator Training

- The qualification process for operators was adequate. The licensee was adequately using the training matrices to assign jobs (Paragraph 4.a).

### Waste Generator Requirements

- The licensee was properly implementing management control and quality assurance audit programs to ensure compliance with waste generation requirements (Paragraph 5.a).

- The licensee's program for the disposal of low-level radioactive waste met regulatory requirements (Paragraph 5.b).

#### Fire Safety

- The fuel processes, equipment, and material storage areas were maintained in accordance with fire safety requirements (Paragraph 6.a).
- Records for the inspection, testing, and maintenance for selected fire protection systems were adequately maintained. The fire protection systems inspected were adequately maintained to ensure their safety performance (Paragraph 6.b).
- The licensee's emergency response team was trained to perform its emergency response functions. Off-site organizations were available to provide aid in the event of a major emergency or structural fire. The fire drills conducted provided challenging scenarios adequate for maintaining the team's ability to deal with a fire emergency. The pre-fire plan was adequately implemented in the licensee training program for plant personnel as well as off-site support agencies (Paragraph 6.c).

#### Attachment:

Partial List of Persons Contacted

Inspection Procedures Used

Items Opened, Closed, and Discussed

List of Acronyms Used

## REPORT DETAILS

### 1. Summary of Plant Status

During the inspection period, routine operations were conducted in the Feeds Material Building (FMB) without incident.

### 2. Chemical Safety (Inspection Procedures (IPs) 88056-88066)

#### a. Process Safety Information (IP 88056) Hazard Identification and Assessment (IP 88057)

##### (1) Scope and Observations

The inspectors reviewed the licensee's recently re-validated process hazard analysis (PHA) for uranium hexafluoride (UF<sub>6</sub>) to ensure that it accurately reflected the controls present in the plant. The inspectors noted no significant differences between the controls stated in the PHA and those present in the actual plant. The inspectors confirmed that team members were multi-disciplined and included maintenance and operations personnel. The inspectors also noted that recent events were incorporated into the analysis. No significant safety issues were identified. The inspectors noted that risk significant recommendations from the PHA were adequately tracked and closed.

The inspectors reviewed the licensee's inventory of hazardous chemicals as detailed in the emergency response plan. The inspectors discovered that the quantity of UF<sub>6</sub> present on-site was more than double the amount listed as a "typical quantity" due to the inventory of cylinders being stored. The inspectors discussed the discrepancy with the licensee who indicated it would revise the quantity as part of the ongoing license renewal review. No significant safety issues were noted due to this oversight.

The inspectors discussed the chemical safety program with the licensee and determined that there were no major changes in the program since the previous chemical safety inspection. The information that comprised the chemical safety plan was reviewed. A chemical safety meeting was observed and minutes of the monthly safety meetings were reviewed. The inspectors observed job safety in the plant, including the use of a special work permit, confined space entry permit, and hot work permit for welding which included a fire watch. No safety issues were identified.

##### (2) Conclusions

The licensee's PHA adequately reflected the existing plant configuration.

#### b. Chemical Safety Training (IP 88061)

##### (1) Scope and Observations

The inspectors reviewed the licensee's chemical safety training program. The inspectors observed chemical safety training for confined space entries; reviewed the basic chemical operator training course including the training plan and tests given to the

trainees; and, reviewed the hazardous communication training including the plans and a discussion of the on-the-job training provided by an operator to a trainee. The training provided to contractors was also discussed. No issues were identified.

(2) Conclusions

The licensee had an adequate program for chemical safety training.

c. Emergency Procedures (IP 88064)

(1) Scope and Observations

The inspectors reviewed the licensee's emergency response procedures for chemical emergencies that had the potential to affect the facility's operations. The inspectors reviewed the emergency response plan and radiological contingency plan; the list of chemical hazards, quantities, locations and use; list of equipment; and, the list of UF<sub>6</sub> locations. The use of the call list of personnel to activate the emergency plan was reviewed and discussed with control room personnel. The call list was observed to be current and implemented. No safety issues were identified.

(2) Conclusions

The licensee was implementing an adequate emergency response program for chemical emergencies.

d. Detection and Monitoring (IP 88060)  
Maintenance and Inspection (IP 88062)  
Management of Change (IP 88063)

(2) Scope and Observations

The inspectors reviewed the management of change controls for the Environmental Protection Facility that was under construction to replace the lagoons. All the approvals for the construction were obtained. The licensee stated that once the construction was completed, a new change request form would need to be initiated to begin operation of the system. No issues were noted.

The inspectors observed the installation of a refurbished rotary feed valve for the Line No. 1 Mudballer. The inspectors noted that appropriate precautions were taken by mechanics for the potential airborne contamination hazard. No safety issues were noted with the work. The inspectors reviewed the work order for the job and noted that the appropriate approvals were provided. The special work permit for the job detailed personnel protective equipment requirements and "lock-out tag-out" to ensure the equipment was properly isolated. These requirements were properly adhered to. No issues were noted.

The inspectors examined preventive maintenance (PM) and functional test records for selected safety significance controls to verify that the PM program was implemented adequately. The inspectors reviewed PM records for selected critical equipment. The

inspectors observed that PMs were performed at the required frequency. The inspectors also observed the licensee perform the routine inspection of the hydrofluoric acid dump tank load cells (critical equipment). No issues were noted.

(2) Conclusions

The licensee was adequately controlling corrective maintenance work and performing preventative maintenance and inspection activities on critical equipment at the appropriate frequency.

e. Incident Investigation (IP 88065)  
Audits and Inspection (IP 88066)

(1) Scope and Observations

The inspectors reviewed the licensee's incident investigation program to ensure that the licensee's procedures and practices for investigations were properly followed and maintained. The inspectors reviewed the incident information provided in the monthly safety meetings. No issues were noted.

A draft of the recent three year audit required by 29 CFR 1910.119 was reviewed. The management assurance audits and health physics audits performed for 2004 were also reviewed and were found to be in compliance with Section 2.7 of the license application. The audits were observed to be thorough and constructive for the improvement of safety.

(2) Conclusions

The licensee was implementing an adequate incident investigation, audits, and inspection program.

f. Information Notice (IN) Review

(1) Scope and Observations

IN-87-026, "Potential Cracks in Stiffening Rings on UF<sub>6</sub> Cylinders," and IN-99-003, "Exothermic Reaction Involving Yellow Cake," were reviewed for their current applicability to the licensee. To the address the recommendations in IN-87-026, the licensee continued to perform inspections on UF<sub>6</sub> cylinders prior to loading and moving. With regard to IN-99-003, the licensee continued to open affected drums in the sampling area of the plant under a hood that provided negative ventilation which minimized the potential for the intake of yellow cake.

(2) Conclusions

The licensee was implementing appropriate actions to address the recommendations provided in IN-87-026 and IN-99-003.

g. Follow-up on Previously Identified Issues

- (1) (Closed) Violation (VIO) 40-3392/2004-010-01: The violation was issued for failure to have a written standard operating procedure to address inoperative control room alarms and instrumentation. The licensee, as a corrective action, developed a standard operating procedure for each process area which described specific steps to address inoperative control room alarms and instrumentation, including requirements to assess the need to take compensatory action to ensure continued safe operations. The inspectors reviewed the new procedure and had no further issues. This item is closed.
- (2) (Open) Inspector Followup Item (IFI) 40-3392/2003-007-04: The IFI was documented to track licensee actions to centralize and automate the corrective action system to enhance its ability to perform adverse trend analyses. The tracking system was observed to be difficult for personnel to use, and entries in the system did not always provide adequate information needed for tracking purposes. The licensee was currently reviewing alternate programs that were more user friendly to replace the current system. The inspectors will continue to monitor the licensee's progress in implementing and enhancing the corrective action system.

**3. Management Organization and Control (IP 88005)**

a. Organizational Structure

(1) Scope and Observations

The inspectors reviewed changes in personnel responsibilities and functions that had occurred for the past six months to verify that requirements in the license concerning personnel qualifications were being met. In January and March 2005, the licensee appointed a new plant manager and maintenance manager, respectively. The inspectors verified that the new plant manager and maintenance manager met the education and experience requirements for their assigned responsibilities, functions, and authorities.

(2) Conclusions

The new plant manager and maintenance manager met the education and experience requirements specified in the license application.

b. Standard Operating Procedures (IP 88058)  
Site-Wide Safety Procedures (IP 88059)

(1) Scope and Observations

The inspectors reviewed plant procedures to determine whether the licensee had adequate organization and controls in place to implement procedures. The inspectors reviewed administrative procedures that provided the policies for procedure development and implementation.

The inspectors reviewed and discussed the use of procedures in the control room and the plant with the operators. It was noted that the backlog of temporary procedures had been reduced to one at the time of the inspection, and the one remaining was scheduled to be replaced by a permanent procedure in the immediate future.

However, on June 28, 2005, the inspectors noted that the periodic review date for several standard operating procedures located in the FMB control room had expired. The intent of the periodic review process was to ensure that the latest requirements and references were incorporated in the operating procedures. Because reviewers were involved with other activities, an extension on the review date was granted on April 26, 2005, as allowed by the administrative procedure MTW-ADM-PRO-0103, "Development and Implementation of Plant Technical Procedures." However, the extension expired on June 15, 2005, and the affected procedures were not removed from use as required.

The inspectors noted that the majority of these procedures were developed during the extended plant outage after the December 22, 2003, Site Area Emergency. In response, the licensee granted another extension until July 2005 and completed the periodic reviews the week following the inspection.

Step 4.25.2 of Procedure MTW-ADM-PRO-0103, "Development and Implementation of Plant Technical Procedures," Revision 5, required that if a procedure extended beyond the periodic review date, remove from use and immediately place into the periodic review cycle.

Contrary to the above, as of June 28, 2005, the inspectors identified that several standard operating procedures were not removed from service and immediately placed into the periodic review cycle after an extension for their periodic review expired on June 15, 2005. This is a violation (VIO 2005-003-01).

(2) Conclusions

A violation was identified for failure to remove several standard operating procedures from service and immediately place into the periodic review cycle after an extension for the periodic review expired.

c. Internal Reviews and Audits

(1) Scope and Observations

The inspectors reviewed the quarterly health physics audits to verify that they were performed, the results were documented and conveyed to management, and audit findings were resolved in a timely manner. The inspectors reviewed recent assessments and noted that they were well documented and findings were resolved in a timely manner.

(2) Conclusions

Health physics audits were documented and conveyed to management, and findings were resolved in a timely manner.

**4. Operator Training (IP 88010)**

a. On-the-Job Training

(1) Scope and Observations

The inspectors observed portions of on-the-job training (OJTs) and job performance measures (JPMs) and reviewed associated documentation. Once operators had completed their required JPMs and other training listed on their qualification summary cards, their cards were signed by the UF<sub>6</sub> Production Manager. The inspectors reviewed the lesson plan, tests, and qualification packages given to operators as part of their qualification to perform specific activities. No significant issues were identified.

The inspectors interviewed the licensee's training specialist regarding the qualification process. The operator's qualification guide listed required general training including chemical safety, industrial safety, radiological protection, and the qualification summary cards that included the list of requirements for a specific job. The inspectors reviewed the training matrix developed by the licensee, which tracked the operators' qualifications for specific jobs, and verified that the shift supervisors had access to the information. No issues were noted.

The inspectors also interviewed a new employee and a trainer in the distillation area. The trainee was implementing the initial stages of the OJT. The inspectors noted that the interaction and communication between the trainer and the trainee were good. No problems were noted.

(2) Conclusions

The qualification process for an operator was adequate. The licensee was adequately using training matrices to assign jobs.

**5. Waste Generation Requirements (IP 84850)**

a. Management Controls, Quality Assurance, and Disposal Site License Conditions

(1) Scope and Observations

The inspectors verified that the licensee established and maintained adequate management controls of quality assurance (QA) to ensure compliance with the requirements of Appendix G of 10 CFR Part 20. The inspectors interviewed licensee personnel on the process for the preparation of a low-level radioactive waste (LLRW) manifest.

The inspectors noted that there were no procedures for the preparation of the waste manifests. The licensee was preparing the manifests from disposal site license conditions, Department of Transportation training for packaging and labeling requirements, and computer programs for the calculation of activity of the LLRWs. The licensee intended to develop procedures for these activities as part of their long-term performance improvement plan, the progress of which is being monitored by NRC staff.

The inspectors reviewed the "Radioactive Waste Burial" QA audit dated October 13, 2004. No problems were noted.

(2) Conclusions

The licensee was properly implementing management control and quality assurance audit programs to ensure compliance with waste generation requirements.

b. Waste Manifests, Waste Classification, Waste Form and Characterization, Waste Shipment Labeling, and Tracking of Waste Shipments

(1) Scope and Observations

The inspectors verified that the licensee complied with the requirements of Appendix G of 10 CFR Part 20 and 10 CFR 61.55 and 61.56 for LLRW form, classification, characterization, labeling, and shipping manifests. The inspectors reviewed selected records to ensure that LLRWs were properly classified in accordance with NRC requirements.

The inspectors reviewed selected radioactive waste shipping manifests for calendar years 2004 and 2005 to date. The inspectors verified that the waste was classified in accordance with 10 CFR Part 61 requirements, and the licensee provided an acceptable level of information in the shipping papers to determine the quantity of each individual radionuclide shipped.

The inspectors determined that the licensee shipped the majority of the waste as "Radioactive LSA" (Limited Specific Activity), and other quantities as "Limited Quantity" for scrap metal disposal. The inspectors determined that proper notification was made to the licensed waste brokers prior to shipments of the radioactive material. The inspectors verified that the licensee received an acknowledgment of receipt for the waste. No problems were noted.

(2) Conclusions

The licensee's program for the disposal of LLRW met regulatory requirements.

**6. Fire Safety (IP 88055)****a. Fire Protection Program Management/Organization and Fire Safety of Process, Equipment, and Storage Areas****(1) Scope and Observations**

The inspectors walked down the UF<sub>6</sub> conversion building and the maintenance group material storage areas to verify that they were being maintained in accordance with fire safety requirements. The inspectors observed that the fire safety systems were properly maintained, and the proper maintenance was conducted according to the procedure. The inspectors reviewed the licensee's procedure for control of combustible materials in process areas and interviewed operations personnel regarding the application and use of the procedure. No issues were noted.

The inspectors also verified that flammable liquids were properly stored in designated cabinets. The inspectors observed that transient combustibles in the operating process areas were adequately controlled to levels below that which could result in a significant fire. The inspectors walked down plant areas surrounding the uranium conversion operation building and noted that those areas were kept free of significant amounts of transient combustibles large enough to be a fire exposure hazard.

The inspectors discussed the organization of the fire protection program with the chief of the emergency response team. The chief stated that no organizational changes had occurred since the last inspection. No safety concerns were noted. However, the inspectors noted that there was no procedural guidance for performing fire safety program periodic activities and checks. The licensee intended to develop procedures for these activities as part of their long-term performance improvement plan, the progress of which is being monitored by NRC staff.

**(2) Conclusion**

The fuel processes, equipment, and material storage areas were maintained in accordance with fire safety requirements.

**b. Review of Documentation Related to the Fire Protection Program; Building Design, Construction, and Ventilation System; Fire Protection Systems; and Fire Hazard Analysis and Integrated Safety Analysis****(1) Scope and Observations**

The inspectors reviewed the safety analysis for the uranium conversion building and walked down fire safety systems referenced in the analysis. The inspectors examined selected fire safety systems to verify they were maintained in proper condition for use. The inspectors observed a selection of fire safety features that were described in the safety analysis including, but not limited to, hydrogen detectors, fire dampers, smoke and heat detectors, and wall penetrations.

The inspectors also observed portable extinguishers throughout the plant site. Portable extinguishers were charged to the normal operating zones and no visible damage was noted. The inspectors accompanied a licensee technician during a visual inspection of fire extinguishers, and no problems were noted. The inspectors also observed fire doors throughout the facility and found them clear of debris and in proper working condition.

The inspectors reviewed selected fire protection inspection, testing, and maintenance records provided by the licensee and the licensee's insurer. No problems were identified with the records, which included observations and inspections of fire doors and dampers, emergency lights, sprinkler systems, smoke detectors, fire hose stations, post indicator valves, diesel pumps, alarm system, fire truck, hydrogen detectors, and the fire protection water system.

(2) Conclusion

Records for the inspection, testing, and maintenance for selected fire protection systems were adequately maintained. The observed fire protection systems were adequately maintained to ensure their safety performance.

c. Pre-Fire Plan, Emergency Response Team Training, Fire Emergency Drills, and Off-Site Support

(1) Scope and Observations

The inspectors discussed the emergency response team training program with the emergency response team manager, and reviewed initial and continuing training records, including monthly training, for members of the emergency response team. The inspectors verified that the members of the emergency response team were current on their required training and that a sufficient number of fire brigade members were qualified to perform their emergency response functions.

Some of the individuals whose qualifications were kept current were from off-site support companies contracted by the licensee. The training provided by these contractors was reviewed by the inspectors including written material and interviews with team members about fire scenarios they were trained to. The services provided by the contractors were adequate and showed their familiarity with the site and the hazards present throughout the facility.

The inspectors interviewed personnel that had participated in the most recent fire drill as well as the person in charge of designing the emergency scenario. The fire brigade team members interviewed explained with clarity the scenario for the drill including initiating conditions, mitigating actions taken due to the circumstances of the fire, and actions needed to assure the safety of plant personnel in case of a real event. The scenario selected for the drill was adequate in providing the fire brigade members with experience to better prepare them in case of a real emergency at the plant.

The licensee had incorporated its pre-fire plan as part of its training program and communications with off-site support agencies. The records reviewed by the inspectors

confirmed this information. No issues were identified. Communication with off-site support organizations, especially with the local fire department, were found to be in order. The fire department had been provided with adequate information about the site and the best course of action to follow for a safe response to an emergency.

(2) Conclusions

The licensee's emergency response team was trained to perform its emergency response functions. Off-site organizations were available to provide aid in the event of a major emergency or structural fire. The fire drills conducted provided challenging scenarios adequate for maintaining the team's ability to deal with a fire emergency. The pre-fire plan was adequately implemented in the licensee training program for plant personnel as well as off-site support agencies.

7. Exit Meeting Summary

The inspectors presented the inspection results to members of the plant staff and management at the conclusion of the inspection on June 24 and 30, 2005. The plant staff acknowledged the findings presented.

## ATTACHMENT

### 1. PARTIAL LIST OF PERSONS CONTACTED

#### Licensee

R. Allshouse, Management Assurance Supervisor  
D. Edwards, Plant Manager  
J. Johnson, Safety Supervisor  
D. Mays, Health, Safety and Regulatory Affairs Manager  
S. Patterson, Health Physics Supervisor  
J. Riley, Regulatory Affairs Manager  
J. Tennison, Maintenance Manager  
B. Vandermeulen, Quality Assurance Manager

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

### 2. INSPECTION PROCEDURES USED

IP 84850	Radioactive Waste Management - Radioactive Waste Generation Requirements
IP 88005	Management Organization and Control
IP 88010	Operator Training/Retraining
IP 88055	Fire Protection
IP 88056	Process Safety Information
IP 88057	Hazard Identification and Assessment
IP 88058	Standard Operating Procedures
IP 88059	Site-Wide Safety Procedures
IP 88060	Detection and Monitoring
IP 88061	Chemical Safety Training
IP 88062	Maintenance and Inspection
IP 88063	Management of Change
IP 88064	Emergency Procedures
IP 88065	Incident Investigation
IP 88066	Audits and Inspection

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

<u>Item</u>	<u>Status</u>	<u>Description</u>
IFI 40-3392/2003-007-04	Discussed	Licensee actions to centralize and automate the corrective action system to enhance their ability to perform adverse trend analyses (Paragraph 2.g).
VIO 40-3392/2004-010-01	Closed	Failure to have a written Standard Operating Procedure to address inoperative control room alarms and instrumentation (Paragraph 2.g).
VIO 40-3392/2005-003-01	Open	Several standard operating procedures were not removed from service and immediately placed into the periodic review cycle after an extension for their periodic review expired (Paragraph 3.b).

**4. LIST OF ACRONYMS USED**

ADAMS	Agency Document Access and Management System
CFR	Code of Federal Regulations
FMB	Feeds Material Building
IFI	Inspector Follow-up Item
IN	Information Notice
IP	Inspection Procedure
JPM	Job Performance Measures
LLRW	Low-Level Radioactive Waste
NRC	Nuclear Regulatory Commission
OJT	On-the-Job Training
PARS	Publicly Available Records
PHA	Process Hazard Analysis
PM	Preventive Maintenance
QA	Quality Assurance
UF <sub>6</sub>	Uranium Hexafluoride
VIO	Violation