

March 30, 2006

Mr. Christopher J. Monetta, Mail Code J26
EHS Manager
GE Nuclear Energy
PO Box 780
Wilmington, NC 28402-0780

SUBJECT: NRC INSPECTION REPORT 07200001/2006-001(DNMS) - G.E. MORRIS
AND NOTICE OF VIOLATION

Dear Mr. Monetta:

This refers to the inspection conducted on January 31 and February 1, 2006, at the GE facility in Morris, Illinois, with continued in-office review through March 9, 2006. The purpose of this routine inspection was to determine whether activities authorized by the license were conducted safely and in accordance with NRC requirements. Specifically, the inspection included evaluation of your surveillance and maintenance program, inventory, quality assurance program, environmental protection program, radiation protection program, emergency preparedness, and training. The NRC inspectors discussed the preliminary findings with members of your staff on February 1, 2006, at the conclusion of the onsite inspection. A final telephone exit meeting was conducted on March 10, 2006, between members of your staff and the inspectors to discuss the final disposition of the issues identified during the inspection.

Areas examined during the inspection are identified in the enclosed report. Within these areas, the inspection consisted of a selective examination 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 two Severity Level IV violations of NRC requirements occurred. One violation was associated with the failure to properly document waste disposal and maintain an accurate inventory. The second violation was associated with the failure to document two Technical Specification violations as nonconformances in the GE Morris corrective action program. These violations were evaluated in accordance with the NRC Enforcement Policy. The current Enforcement Policy is included on the NRC's Web site at www.nrc.gov; select **What We Do, Enforcement**, then **Enforcement Policy**. The violations are described in the enclosed Notice of Violation (Notice) and the circumstances surrounding them are described in detail in the subject inspection report.

You are required to respond to this letter and should follow the instructions specified in the enclosed Notice when preparing your response. For your consideration and convenience, an excerpt from NRC Information Notice 96-28, "SUGGESTED GUIDANCE RELATING TO DEVELOPMENT AND IMPLEMENTATION OF CORRECTIVE ACTION," is enclosed. The NRC will use your response, in part, to determine whether further enforcement action is necessary to ensure compliance with regulatory requirements.

In addition, the NRC determined that a violation related to the calibration frequency of the spent fuel basin leak detection system occurred. This non-repetitive, licensee identified and corrected violation is being treated as a Non-Cited Violation (NCV), consistent with Section VI.A of the Enforcement Policy. The NCV is described in the subject inspection report. If you contest the violation or significance of the NCV, you should provide a response within 30 days of the date of this inspection report, with the basis for your denial, to the Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington DC 20555-0001, with copies to the Regional Administrator, Region III, and the Director, Office of Enforcement, United States Nuclear Regulatory Commission, Washington, D.C. 20555-0001.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be available electronically in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). The NRC's document system is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>.

Sincerely,

/RA/

Patricia J. Pelke, Chief
Materials Licensing Branch

Docket No. 07200001
License No. SNM-2500

Enclosure:
Inspection Report 07200001/2006-001(DNMS)
w/Attachment: Supplemental Information

cc w/encl: J. E. Ellis, Manager, Morris Operation
A. McFadden, Radiation Safety Specialist
E. W. Secko, Regulatory Compliance Manager
D. Perrero, Illinois Emergency Management Agency

In addition, the NRC has identified a violation related to the calibration frequency of the spent fuel basin leak detection system. This non-repetitive, licensee identified, and corrected violation is being treated as Non-Cited Violation (NCV), consistent with Section VI.A of the Enforcement Policy. The NCV is described in the subject inspection report. If you contest the violation or significance of the NCV, you should provide a response within 30 days of the date of this inspection report, with the basis for your denial, to the Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington DC 20555-0001, with copies to the Regional Administrator, Region III, and the Director, Office of Enforcement, United States Nuclear Regulatory Commission, Washington, D.C. 20555-0001.

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Sincerely,
/RA/

Patricia J. Pelke, Chief
Materials Licensing Branch

Docket No. 07200001
License No. SNM-2500

Enclosure:
Inspection Report 07200001/06-001(DNMS)
w/Attachment: Supplemental Information

cc w/encl: J. E. Ellis, Manager, Morris Operation
A. McFadden, Radiation Safety Specialist
D. Perrero, Illinois Emergency Management Agency
E. W. Secko, Regulatory Compliance Manager

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NOTICE OF VIOLATION

General Electric Company
Morris, Illinois

Docket No. 07200001
License No. SNM-2500

During an NRC inspection conducted at GE Morris on January 31 and February 1, 2006, with in-office review through March 9, 2006, two violations of NRC requirements were identified. In accordance with the NRC Enforcement Policy, the violations are listed below:

1. Condition 13 of NRC license No. SNM-2500, Amendment 9 issued June 16, 1995, for Independent Storage of Spent Nuclear Fuel and High-Level Radioactive Waste, requires, in part, that the licensee operate the facility in accordance with the Technical Specifications. Technical Specifications, Section 6.3, "Plans and Procedures," requires, in part, that plans and procedures be established and implemented to assure compliance with Technical Specifications and applicable governmental regulations. The licensee established a procedure, "Accountability Procedure," issued February 9, 1996, to perform material inventory. Section 3.3 of the Accountability Procedure, "Material Discards," requires, in part, that when material is transferred to waste drums containing low specific activity waste, a "Morris Operation (MO) Analytical Services Discard" form must be completed and the Material Balance Area Custodian is required to update the site inventory records after receipt of the discard form.

Contrary to the above, on December 7, 1999, the licensee transferred two uranium sources to waste drums containing low specific activity waste and failed to complete the required "MO Analytical Services Discard" form and update the site general inventory.

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

2. Condition 13 of NRC license No. SNM-2500, Amendment 12 issued December 21, 2004, for Independent Storage of Spent Nuclear Fuel and High-Level Radioactive Waste, requires, in part, that the licensee operate the facility in accordance with the Technical Specifications in Appendix A. Appendix A, Section 1.2.1, "Quality Assurance," requires, in part, that the licensee conduct activities in accordance with 10 CFR 72 Subpart G, as described in the Morris Operation Quality Assurance (QA) Plan, NEDE-31559. The Morris QA Plan, Section 16.2, "System Description," requires, in part, that corrective actions are initiated and documented on a Corrective Action Request (CAR) when conditions that have or may have an adverse affect on quality are detected. Section 16.2.2 of the QA plan requires, in part, that cases involving specification violations be reported as nonconformances.

Contrary to the above, as of January 31, 2006, the licensee failed to report two Technical Specification violations as nonconformances in its corrective action program. Specifically, the licensee did not report the failure to calibrate the leak detection system on a monthly basis and the failure to complete the "MO Analytical Services Discard" form and update the site general inventory after disposal of two uranium sources.

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

Pursuant to the provisions of 10 CFR 2.201, General Electric is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555, with a copy to the Regional Administrator, Region III, 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 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, with the basis for your denial, to the Director, Office of Enforcement, United States Nuclear Regulatory Commission, Washington, DC 20555-0001.

Because 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 the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>, to the extent possible, it should not include any personal privacy, proprietary, or safeguards information so that it can be made available to the public 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 bases 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 2.790(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 2 working days.

Dated this 30th day of March 2006

U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Docket No. 07200001

License No. SNM-2500

Report No. 07200001/2006-001(DNMS)

Licensee: General Electric Company

Facility: Morris Operation

Location: 7555 East Collins Road
Morris, IL 60450

Dates: January 31 through February 1, 2006
February 2 through March 10, 2006 (in-office review and
telephone exit)

Inspectors: Magdalena R. Gryglak, Reactor Inspector
Sarah R. Bakhsh, Health Physicist

Approved by: Patricia J. Pelke, Chief
Materials Licensing Branch
Division of Nuclear Materials Safety

EXECUTIVE SUMMARY

General Electric Company
Morris, IL 60521
NRC Inspection Report 07200001/2006-001(DNMS)

The inspection involved the review and observation of selected aspects of fuel basin safety including surveillance and maintenance, material inventory, quality assurance program, environmental protection program, radiation protection program, emergency preparedness, and training. (IP 60855)

Maintenance and Surveillance of the Spent Fuel Basin

- The licensee adequately maintained the physical condition and safety of the spent fuel basin by performing the necessary operability checks of systems and surveillance activities. The inspectors determined that a violation of the NRC license occurred. Specifically, the licensee failed to calibrate the basin leak detection system on a monthly basis. This non-repetitive, licensee identified and corrected violation is being treated as a Non-Cited Violation, consistent with Section VI.A of the NRC Enforcement Policy. (Section 1.0)

Material Inventory

- During review of the licensee's material balance reports, the inspectors identified one violation pertaining to the licensee's failure to properly document a 1999 disposal of two uranium sources and update the site general inventory in accordance with its material accountability procedure. (Section 2.0)

Quality Assurance

- The inspectors determined that the internal as well as the external audit reports were adequate. The inspectors identified one violation pertaining to the licensee's failure to document two Technical Specification violations as nonconformances in its corrective action program. (Section 3.0)

Environmental Protection

- The licensee's environmental protection program was implemented in accordance with applicable regulations. (Section 4.0)

Radiation Protection

- The licensee's radiation protection program was consistent with the requirements of the license and regulations. The licensee's staff was adequately monitored. Policies in place were being implemented. (Section 5.0)

Emergency Preparedness

- The licensee's Emergency Plan complied with the requirements of the applicable regulations and the license. (Section 6.0)

Training

- The licensee's training program complied with requirements of the applicable regulations and the license. (Section 7.0)

Report Details

1.0 Maintenance and Surveillance of the Spent Fuel Basin

a. Scope

The inspectors toured the spent fuel basin (SFB) building and evaluated its condition and safety. The inspectors verified the operability of systems and reviewed select surveillance records.

b. Observations and Findings

The inspectors toured the SFB building to assess the general condition of the area. The area was clean and well lit. There were no signs of physical deterioration in the condition of the SFB nor its contents. The inspectors confirmed through observation and review of records that the licensee maintained the water level at approximately 12 feet above the top of the fuel. The water temperature averaged approximately 78 degrees Fahrenheit (F). In accordance with regulatory requirements, the licensee took SFB water samples on a monthly basis to measure the conductivity and activity in the water in order to maintain a benign environment for fuel and equipment stored in the SFB. The inspectors reviewed documentation of test results to verify the SFB basin water conductivity and the activity did not exceed regulatory limits.

During the tour, the inspectors verified that the clean up, cooling, ventilation, and the leak detection systems were operational. The basin water was continually drawn from basin skimmers, pumped through a resin filter and returned to the basin. Filter regeneration was accomplished remotely. The licensee monitored the filter flow, filter pump pressure, and filter activity. The cooling system consisted of two pumps that pumped basin water through two heat exchangers. The heat exchanger system utilized water-to-freon chillers that were located outside the building. In order to maintain the water temperature at 78 degrees F, one pump, one heat exchanger, and one chiller unit were needed. As part of the surveillance checks, the licensee continually monitored the pump and the chiller discharge pressures. The leak detection system consisted of a sump where basin and intrusion water accumulated, was sampled, filtered, and returned to the SFB. The licensee calculated the leakage rate to be averaging 130 gallons per day. The licensee verified the operability of the ventilation system by recording the pressure differences within and among connected areas to ensure air flow from areas of low potential radioactive contamination to areas of high potential radioactive contamination.

The licensee maintained a computer data system, GE Morris Operation Round Data, where the operator on duty recorded results of surveillance activities. The inspectors selected random dates and verified that all of the necessary surveillance checks were performed and readings were taken as required by the license and Technical Specifications. The SFB building contained other basin instrumentation such as local area radiation monitors and criticality monitors. During the tour, the inspectors verified the local radiation monitors and criticality monitors were operational. In addition, the

inspectors reviewed calibration records for the local radiation monitors, criticality monitors, and the leak detection system. The licensee performed calibration of the local radiation monitors and criticality monitors quarterly. However, the licensee failed to perform calibration of the leak detection system monthly as required by the Technical Specifications. The licensee performed this activity only once between January and October 2005. After recognizing the discrepancy between the Technical Specification requirements and its practice, the licensee immediately reinstated calibration of the leak detection system at the required frequency.

Condition 13 of the NRC license No. SNM-2500, for Independent Storage of Spent Nuclear Fuel and High-Level Radioactive Waste, requires, in part, that the licensee operate the facility in accordance with its Technical Specifications. Section 4.4 of the Technical Specifications, "Instrumentation," Table 4-2 requires, in part, that the licensee calibrate the basin leak detection system monthly.

Contrary to the above, for a period of approximately 10 months, between January and October 2005, the licensee failed to calibrate the basin leak detection system on a monthly basis. This non-repetitive, licensee identified and corrected violation is being treated as a Non-Cited Violation (NCV), consistent with Section VI.A of the NRC Enforcement Policy (07200001/2006-001-01). As part of the corrective actions, the licensee immediately reinstated calibration of the leak detection system at the required frequency.

The inspectors reviewed the annual crane inspection records. The licensee had a number of different cranes and lifting devices at the facility. An independent party conducted the annual crane inspections. The three safety-related cranes located in the SFB building had no defects identified during the annual inspection.

c. Conclusion

The licensee adequately maintained the physical condition and safety of the SFB by performing the necessary operability checks of systems and surveillance activities. The inspectors determined that a violation of the NRC license occurred. Specifically, the licensee failed to calibrate the basin leak detection system on a monthly basis. This non-repetitive, licensee identified and corrected violation is being treated as an NCV, consistent with Section VI.A of the NRC Enforcement Policy.

2.0 Material Inventory

a. Inspection Scope

The inspectors reviewed the licensee's material balance reports and the licensee's procedures to account for material in storage.

b. Observations and Findings

The inspectors reviewed the licensee's material balance reports for 2004 and 2005, and observed a difference in the amount of material accounted for on the reports. While

performing the 2005 annual inventory, the licensee noted differences between the actual physical inventory and the inventory that was reported on the material balance report. The licensee actually possessed less material than what the balance report indicated. After further investigation, the licensee determined that GE Morris personnel disposed of two uranium sources in December of 1999. However, the licensee's material balance report was not revised to reflect the change in the physical inventory that resulted from the 1999 disposal. This discrepancy went undetected for 6 years. Upon discovery of the discrepancy in March 2005, the licensee revised the inventory reported on the material balance report to reflect the actual physical inventory and submitted a "Nuclear Material Transaction Report," to the NRC.

Technical Specifications, Section 6.3, "Plans and Procedures," requires, in part, that plans and procedures be established and implemented to assure compliance with Technical Specifications and applicable governmental regulations. The inspectors reviewed the licensee's "Accountability Procedure," dated February 9, 1996. Section 3.3 of the procedure, "Material Discards," contained steps to be followed after material was discarded. Specifically, the procedure required the licensee to complete a "Morris Operation (MO) Analytical Services Discard" form to properly document the disposal of two uranium sources and update the source inventory and the site general inventory. The licensee failed to complete the required form and update the site general inventory. Moreover, this condition went undetected for 6 years, from December 1999 until March 2005. The licensee's failure to complete a "MO Analytical Services Discard" form to properly document the disposal of two uranium sources and update and the site general inventory is a Violation (VIO 07200001/2006-001-01).

c. Conclusion

During review of the licensee's material balance reports, the inspectors identified one violation pertaining to the licensee's failure to properly document the 1999 disposal of two uranium sources and update the site general inventory in accordance with its material accountability procedure.

3.0 Quality Assurance Program

a. Inspection Scope

The inspectors reviewed a number of areas pertaining to the licensee's Quality Assurance (QA) Program. In particular, the inspectors reviewed the internal and external audit reports as well as the corrective action program.

b. Observations and Findings

The licensee conducted annual audits to assess compliance with NRC regulations, facility license requirements, and internal procedures. The licensee did not identify any findings during the internal audit of the QA program. The NRC inspectors identified that there was only one individual onsite who was certified to perform audits. The licensee recognized the need to certify other personnel to perform internal audits in order to provide a more independent program review. In addition to the internal audit, the GE

Morris facility was also audited by the Connecticut Yankee Atomic Electric Company in October 2005. The team identified two deficiencies and made two recommendations regarding adequacy of procedures and record keeping.

The NRC inspectors reviewed the licensee's QA and the corrective action program. The licensee stated that no corrective action items have been entered into its program since 2002. During the inspection, the inspectors identified two instances where the licensee failed to document Technical Specification violations as nonconformances in its corrective action program. The first example involved the licensee's failure to calibrate the leak detection system on a monthly basis as required by the Technical Specifications. The licensee took adequate corrective actions after recognizing the discrepancy. However, according to the licensee's corrective action program, the incident warranted documentation as a nonconformance.

The second example involved the inventory error described in Section 2.0 of this report. The licensee's failure to properly document the disposal of two uranium sources and update the inventory after the material was discarded constituted a violation of the NRC license and the Technical Specifications. In accordance with the licensee's corrective action program, the licensee was required to document specification violations as a nonconformance. The licensee's failure to document two Technical Specification violations as nonconformances in its corrective action program, as described in the Morris Operation QA Plan, is a Violation (VIO 07200001/2006-001-02).

c. Conclusion

The inspectors determined that the internal as well as the external audit reports were adequate. The inspectors identified one violation pertaining to the licensee's failure to document two Technical Specification violations as nonconformances in its corrective action program.

4.0 Environmental Protection

a. Inspection Scope

The inspectors reviewed documents pertaining to the environmental protection program and interviewed individuals directly involved with the program.

b. Observations and Findings

The inspectors reviewed the licensee's February 24, 2006 report which summarized the results of the licensee's environmental monitoring program for calendar year 2005. The maximum potential committed effective dose equivalent to a member of the public resulting from all effluent releases including air, water from the sanitary lagoons, ground water in the monitoring well, and direct radiation from operational activities was 0.0319 millirem (mrem). This value was well below the regulatory limit.

The licensee monitored concentrations of radioactive material in the effluent air on a weekly basis, in water in the two sanitary lagoons on a monthly basis, and in the ground

water in the eight monitoring wells around the process building on a quarterly basis. Review of records indicated that the air exhausted from the main stack was well below the limits in the Technical Specifications. The licensee tested the lagoon water and the well water for the presence of tritium. The concentration of this isotope was minimal averaging between 150 to 300 picocuries per liter. The licensee also monitored the sanitary lagoons for the presence of cesium-137 and cobalt-60. No activity was detected.

c. Conclusions

The licensee's environmental protection program was implemented in accordance with applicable regulations.

5.0 Radiation Protection

a. Inspection Scope

The inspectors toured the facility, reviewed radiation protection documents and procedures and interviewed individuals directly involved with the radiation protection program.

b. Observations and Findings

The inspectors reviewed the minutes of twelve Radiation Safety Committee meetings which were held monthly as required by the Technical Specifications. The licensee discussed elements of radiological safety such as personnel monitoring records, dose calculations, radiation worker training, and environmental monitoring results as well as any other ongoing issues related to the operation of the facility. The meeting minutes were adequately documented.

The inspectors reviewed the exposure results for workers at the facility for calendar year 2005. The highest radiation exposures were 223 mrem total effective dose equivalent resulting from routine activities and 221 mrem to the extremities. The inspectors also reviewed the licensee's sealed source inventory. The licensee possessed only a few sealed sources and tested them for leakage at the required frequency. The results of dry wipe tests indicated no surface contamination or leakage above Technical Specification limits.

The inspectors reviewed the radiation protection program and the As-Low-As-Reasonably-Achievable (ALARA) plan. The inspectors observed that the Radiation Work Permits (RWP) did not specify expected radiation levels in a workplace. The licensee established internal limits; however, they were not documented in the ALARA plan nor the RWPs. The licensee indicated that this information will be incorporated into its RWPs.

c. Conclusions

The licensee's radiation protection program was consistent with the requirements of the license and regulations. The licensee's staff was adequately monitored. Policies in place were being implemented.

6.0 Emergency Preparedness

a. Inspection Scope

The inspectors reviewed the current Emergency Plan to ensure compliance with the license and the associated Technical Specifications.

b. Observations and Findings

The inspectors reviewed in detail the Morris Operation Emergency Plan as well as any associated procedures, including Morris Operation Instruction 233, "Situation Plan," dated December 3, 2004. The Situation Plan contained potential accident scenarios and listed the sequence of actions to be taken to mitigate consequences of the potential accidents. Possible emergency events included fuel or cask drop, criticality, tornado damage, radiological spills, radioactive material releases and exposures, fires and explosions. The inspectors determined that the Emergency Plan satisfied conditions set forth in 10 CFR 72.32(a) regarding the classification system and reflected the current condition of the facility. The implementing procedures agreed with the assumptions made in the Emergency Plan.

The inspectors toured areas of the facility and assessed their conditions. The rooms were clean and free of combustibles.

c. Conclusions

The licensee's Emergency Plan complied with the requirements of the applicable regulations and the license.

6.1 Training

a. Inspection Scope

The inspectors reviewed the licensee's training program.

b. Observations and Findings

The inspectors reviewed the training program as well as the training material. The program and the training slides contained 10 CFR Part 19 and 20 requirements. Only one staffing change was made in 2005. The new employee was adequately trained as indicated by training certificates.

c. Conclusion

The licensee's training program complied with requirements of the applicable regulations and the license.

9.0 Exit Meeting

The inspectors presented the inspection results to members of licensee management at the conclusion of the inspection on March 10, 2006. The licensee acknowledged the findings presented.

During the course of the inspection, the licensee did not identify any of the documents reviewed or statements or references to specific processes as proprietary.

ATTACHMENT: SUPPLEMENTAL INFORMATION

SUPPLEMENTAL INFORMATION

KEY POINTS OF CONTACT

Licensee

J. Ellis, Plant Manager
E. Secko, Regulatory Compliance Manager
A. McFadden, Radiation Safety Officer
T. Maikoff, Operations/Maintenance Manager

INSPECTION PROCEDURES USED

60855 Operation of an ISFSI

ITEMS OPENED, CLOSED, AND DISCUSSED

<u>Opened</u>	<u>Type</u>	<u>Summary</u>
07200001/2006-001-01	NCV	Failure to calibrate the leak detection system at the required frequency
07200001/2006-001-01	NOV	Failure to properly document a disposal of two uranium sources and update the site general inventory
07200001/2006-001-02	NOV	Failure to document two Technical Specification violations as nonconformances in the licensee's corrective action program

<u>Closed</u>	<u>Type</u>	<u>Summary</u>
07200001/2006-001-01	NCV	Failure to calibrate the leak detection system at the required frequency

Discussed

None

LIST OF DOCUMENTS REVIEWED

Environmental Safety and Health Plan; NEDO-32094; dated December 12, 1993

GE Morris Quality Assurance Plan; NEDE-31559; Revision 2

Morris Operation Emergency Plan; NEDO-31955; dated February 5, 1997

Procedure "Accountability Procedure"; dated February 9, 1996

Procedure MOI-314, "Special Nuclear Material (SNM) Accountability"; dated January 15, 2004

Procedure MOI-926, "ALARA Procedure"; dated June 11, 2002

Procedure MOSP-003, "Safety Training"; Revision 2; dated November 18, 2003

Procedure No 7-3, "Routine Checks Associated With Plant Surveillance"; dated October 21, 2005

LIST OF ACRONYMS USED

ALARA	As-Low-As-Reasonably-Achievable
F	Fahrenheit
MO	Morris Operation
mrem	millirem
NCV	Non-Cited Violation
QA	Quality Assurance
RWP	Radiation Work Permit
SFB	Spent Fuel Basin