



April 24, 2006

United States Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555-0001

Subject: Reply to Notice of Violation

Document Control

This letter is in response to the Notice of Violation resulting from the Inspection Report 71-0884/06-201.

The attached table includes the violation, cause of the violation, corrective action, actions to prevent recurrence, and the date by when the actions will be complete.

If you or your staff have any questions, or require further information, please contact me at (803) 214-5830 or via e-mail at rbyars@rwe.nukem.com.

Sincerely,

Richard Byars.
Director, Regulatory Compliance

cc: Robert J. Lewis
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Mission Statement:

To provide safe, compliant, and cost-effective radioactive waste management solutions through the innovative application of proven technologies.

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<u>Discrepancy</u>	<u>Cause</u>	<u>Corrective Action</u>	<u>Action to Prevent Recurrence</u>	<u>Completion Date</u>
RNC procedure NSOP-503, "Audit Procedure," step 5.4.1.1.1 requires that an internal audit schedule cross-reference matrix be prepared each year. Contrary to this requirement, an audit cross-reference matrix was not prepared for the 2005 and 2006 audit years.	The matrix was used in 2003 and 2004 during this time it was identified that the matrix did not provide any benefit and was a hindrance. It was decided to stop using the matrix and but due to an oversight the procedure was not revised.	None	The procedure was revised to remove the requirement for the matrix. Conducted training with the audit staff to assure that they follow the procedure until revised.	Complete
RNC procedure NSOP-105, "Development/Revision of NUKEM Standard Operating Procedures," section 5.6, "Obsoleting," did not prescribe adequate controls for the removal of obsolete procedures from controlled copy holders as copies of NSOP-270, "Information Notice," that was obsoleted in April 2005, were found in three of four controlled copy holder's binders audited by the team.	Document Control did not properly update the NSOP manual index to reflect the obsolete procedure.	The index was updated and document control reviewed all NSOP manuals to assure that that they were up to date.	NSOP – 160 was revised to require Document Control to notify control copy holder of obsolete procedures via e-mail.	Complete
RNC procedure NSOP-116, "Quality Assurance Training," step 5.5.4.2 requires that visual capabilities be determined annually for inspectors. Contrary to this requirement, the NRC identified three RNC inspectors who had exceeded the one year time frame for their visual capability determination.	Due to work scheduling and available appointments the one year requirement was exceeded. (Note: all inspector involved passed follow up eye exams)	A review of the training files was performed to identify the time period between the expiration and the next eye exam. The records for the inspection performed by the inspector were reviewed; no inspections were performed during the lapse in the eye exam.	NSOP-116 has been revised to reference NSOP-565 "Nondestructive Testing". NSOP-565 was revised allow a grace period until the end of the month and the monthly report that identifies upcoming requalifications was modified to better highlight the pending expiration.	Complete



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RNC Procedure NSOP-107, "Training and Indoctrination of RNC/Contract Personnel," step 5.2.6.2 requires that the Department Manager's determination and certification for the grandfathering of personnel, as allowed by step 5.2.6.1, be documented in a memorandum attached to the associated quality training checklist (QTC). Contrary to this requirement, records of one grandfathered employee included a memorandum but no associated QTC.	Over sight during the qualification of the employee.	QTC was attached to the memo.	The employee received On The Job training on the procedure. The employee was tasked with reviewing and correcting the training files.	4/28/06
RNC procedure NSOP-508, "Control of Measuring and Test Equipment," step 5.2.12.c states, in part, that the calibration due date shall be included on the label attached to Level 1 M&TE (measuring and test equipment). Contrary to this requirement, an R134 variable leak source, a Level 1 M&TE with serial number 08750, did not have the required calibration due date included on its attached label.	All items were tagged with the date of calibration RNC did not provide the supplier the calibration interval for the items.	The items were tagged with the calibration due date.	Training was conducted with the Operations and QA personnel involved in the procurement. The training addressed insuring all technical requirements are addressed on the purchase orders and that all the requirements are verified upon receipt.	Complete
RNC procedure NSOP-508, step 5.2.4, states that purchase orders for calibration of Level 1 M&TE state shall require certain information (specified in a subsequent step) be contained in the calibration certificate. Contrary to this requirement, purchase orders 11105, dated October 21, 2005, 11241 dated February 22, 2006, and 11242 dated February 22, 2006, for the calibration of Level 1 M&TE, did not contain a requirement for the specified information to be provided on the calibration certificate.	Over sight on the part of the employee preparing the purchase order.	None – all required information was obtained.	Training was conducted with the Operations and QA personnel involved in the procurement. The training addressed insuring all technical requirements are addressed on the purchase orders and that all the requirements are verified upon receipt.	Complete



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<p>RNC procedure NSOP-520, "In Process and Final Inspection of Quality Level A and B Items," step 5.4.1 requires that procured items shall be inspected in accordance with the requirements specified on the purchase order. RNC procedure NSOP-420, "Procurement Cycle," Attachment 7.1, requires technical requirements for procurement be included in the procurement scope. Contrary to the requirements of these procedures, multiple purchase orders were reviewed during the inspection that did not include relevant information from drawing STD-02-095, revision 3, for Model 10-142 Shipping Cask, regarding the temperature testing limitations (65 - 75 degrees F) for gasketing materials.</p>	<p>The temperature requirement was not on the license drawing and was overlooked during the preparation of the purchase order.</p>	<p>A calibrated thermometer was purchased and the durometer tests were performed in the required temperature range. All material passed the test.</p>	<p>Training was conducted with the Operations and QA personnel involved in the procurement of the gaskets to assure that all technical requirements were addressed on the purchase order.</p>	<p>Complete</p>