UNITED STATES



NUCLEAR REGULATORY COMMISSION

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

July 5, 2006

NMED Nos. 050499, 050598, 050760 NRC Event No. 42377

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

SUBJECT: NRC INSPECTION REPORT 40-3392/2006-005 AND NOTICE OF VIOLATION

Dear Mr. Edwards:

This letter refers to the inspection conducted on May 1-12 2006, at the Honeywell Specialty Chemicals facility, in Metropolis, Illinois. The purpose of the inspection was to perform a routine review of the implementation of the chemical safety, environmental protection, and low-level radioactive waste programs, and to determine whether activities authorized by the license were conducted safely and in accordance with NRC requirements. At the conclusion of the inspection on May 12, 2006, the findings were discussed with those members of your staff identified in the enclosed report. A telephone re-exit was held on June 5, 2006, to further discuss the inspection observations and findings.

The inspection 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 inspection are identified in the enclosed report. Within these areas, the inspection 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 NRC Enforcement Policy, that may be found on the NRC's web site at http://www.nrc.gov/what-we-do/regulatory/enforcement/enforce-pol.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 follow requirements for the review and approval of operating procedures.

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.

D. Edwards

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 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 inspection, please contact us.

Sincerely,

/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 40-3392/2006-005

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

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NOTICE OF VIOLATION

Honeywell Specialty Chemicals Metropolis, Illinois Docket No. 40-3392 License No. SUB-526

During an NRC inspection conducted on May 1-12, 2006, 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. 16, 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 4.15.1 of Procedure MTW-ADM-PRO-0103, Revision 9, requires that concurrence of reviewers of the procedure be obtained prior to approval using the MTW-FRM-PRO-0001, *"MTW Policy and Procedure Review and Approval"* form.

Step 4.18 of Procedure MTW-ADM-PRO-0103, Revision 9, states that major revisions are subject to the verification and validation process and requires that major revisions be reviewed by all disciplines. Step 4.12 of Procedure MTW-ADM-PRO-0103, Revision 9, further requires that proposed procedures including major revisions undergo verification and validation by a peer review, an engineer, and the user of the procedure prior to approval.

Contrary to the above, as of April 24, 2006, procedure MTW-SOP-DIS-0100, "Distillation Startup," Revision 6, had not been reviewed by all disciplines. Specifically, the proposed procedure had not been reviewed by the Health Physics/Safety office prior to its approval. In addition, contrary to the above as of April 24, 2006, the procedure had not undergone a verification and validation by a user of the procedure prior to its approval.

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

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violation or severity level, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. If an adequate reply is not received within the time specified in this Notice, an order or a Demand for Information may be issued as to why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

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

Because your response will be made publically available, to the extent possible, it should not include any personal privacy, proprietary, or safeguards information so that it can be made publically available without redaction. If personal privacy or proprietary information is necessary to provide an acceptable response, then please provide a bracketed copy of your response that identifies the information that should be protected and a redacted copy of your response that 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 5th day of June, 2006

U.S. NUCLEAR REGULATORY COMMISSION

REGION II

Docket No.:	40-3392
License No.:	SUB-526
Report No.:	40-3392/2006-005
Licensee:	Honeywell International, Inc.
Facility:	Metropolis Works
Location:	P. O. Box 430 Metropolis, IL 62960
Dates:	May 1-12, 2006
Inspectors:	Wayne L. Britz, Fuel Facility Inspector Nilda S. Rivera, Fuel Facility Inspector Stephen Subosits, 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 40-3392/2006-005

The purpose of this inspection was to perform a routine review of the implementation of the chemical safety, environmental protection, and low-level radioactive waste programs. The inspection involved observation of work activities, a review of selected records and procedures, and interviews with plant personnel. The report covers a two-week inspection effort by three regional fuel facility inspectors. The inspection identified the following aspects of the program as outlined below:

Chemical Safety

- The process areas inspected were operated safely in accordance with the licensee's chemical safety requirements (Section 2.a).
- The licensee's implementation of the chemical detection and monitoring program, including maintenance and inspection activities, was adequate (Section 2.b).
- A violation was identified for the failure to follow requirements for the development and implementation of plant technical procedures (Section 2.c).
- The licensee was implementing an adequate incident investigation, audits, and inspection program (Section 2.d).

Environmental Protection

- Adequate management controls and quality assurance reviews were conducted in support of the environmental protection program (Section 3.a).
- The quality control program for analytical measurements was conducted adequately in support of the environmental monitoring and analysis program (Section 3.b).
- The environmental protection program was being implemented in accordance with license requirements (Section 3.c).

Radioactive Effluents, and Low Level Radioactive Waste Programs

- Management controls and audits were adequate in support of the environmental protection program (Section 4.a).
- The licensee's programs for the sampling, measurement and control of radioactive effluents to the environment were adequate. Procedure development and calibration of the stack flows were being performed to enhance the effluent monitoring program (Section 4.b).

- The implementation of the licensee's program for the characterization and manifesting of radioactive materials shipped was adequate, but no procedures existed for the program. The licensee stated they would develop procedures during calender year 2006 as part of its long-term performance improvement program being monitored by the NRC (Section 4.c).
- The licensee's area for the storage of low level radioactive waste was adequately maintained and marked. The licensee has plans to significantly reduce the inventory of empty ore drums and drums containing hard ore during calender year 2006 (Section 4.d).

Attachment: Partial List of Persons Contacted Inspection Procedures Used Items Opened List of Acronyms Used

REPORT DETAILS

2. <u>Summary of Plant Status</u>

During the inspection period, routine operations were conducted in the Feeds Material Building (FMB) without incident. The licensee was preparing to shut the plant down from May 15 through 30, 2006, to conduct a scheduled maintenance outage.

3. <u>Chemical Safety (Inspection Procedures (IP) 88056-66)</u>

a. Process Safety Information, and Site-Wide Safety Procedures (IPs 88056, and 88059)

(1) <u>Scope and Observations</u>

The inspectors reviewed chemical safety operations and noted that chemical hazards were identified, and material safety data sheet information was available in the plant. The inspectors also observed job safety in the plant, including the use of special work permits, lockout/tagouts, and radiation work permits. No safety issues were identified.

(2) <u>Conclusions</u>

The process areas inspected were operated safely in accordance with the licensee's chemical safety requirements.

- b. Detection and Monitoring, and Maintenance and Inspection (IPs 88060, and 88062)
- (1) <u>Scope and Observations</u>

The inspectors reviewed the implementation of the licensee's chemical detection and monitoring program for the FMB including records for the maintenance and inspection of equipment related to safety. The inspectors noted that the records for the chemical detection and monitoring system and other equipment related to safety were adequately maintained. The inspectors also observed an assistant operator inspect a system to verify that it was safely configured and isolated from other process systems prior to allowing maintenance personnel access to the system. No issues were noted.

(2) <u>Conclusions</u>

The licensee's implementation of the chemical detection and monitoring program, including maintenance and inspection activities, was adequate.

- c. <u>Standard Operating Procedures, Management of Change (IPs 88058, and 88063)</u>
- (4) <u>Scope and Observations</u>

The inspectors reviewed administrative procedures that provided the policies for procedure development and implementation and assessed whether they were being adhered to by the licensee. The inspectors also discussed with operators the use of procedures for performing plant activities.

During inspections in the FMB control room on May 11, 2006, the inspectors noted the presence of a *MTW Policy and Procedure Review and Approval* form attached to a review package for a major revision of a standard operating procedure (SOP), MTW-SOP-DIS-0100, "*Distillation Startup*," (approved) on April 24, 2006. The validation checklist was used to document the results of a field walkdown by operators of the revised procedure to ensure that it could be performed as written prior to being reviewed and approved by plant management. The inspectors also noted that the draft procedure was incomplete in that it did not contain all the required valve numbers.

License Condition 10 of NRC License No. SUB-526, Amendment No. 16, 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 4.15.1 of Procedure MTW-ADM-PRO-0103, Revision 9, requires that concurrence of reviewers of the procedure are obtained prior to approval using the MTW-FRM-PRO-0001, *"MTW Policy and Procedure Review and Approval"* form. Step 4.15.2 of Procedure MTW-ADM-PRO-0103, Revision 9, further requires that the Document Owner/Department Manager Approve the procedure using the MTW-FRM-PRO-0001, *"MTW Policy and Procedure Review and Approval"* form that documents the procedure development and approval process. The form attached to revision 6 of the distillation start up procedure indicated that the required technical and management reviews were completed on April 24, 2006. The inspector further noted that the Health Physics/Safety office had not reviewed and approval date.

Step 4.18 of Procedure MTW-ADM-PRO-0103, Revision 9, requires that major revisions are subject to the verification and validation (V&V) process and must be reviewed by all disciplines. Step 4.12 of Procedure MTW-ADM-PRO-0103, Revision 9, further required that proposed procedures including major revisions undergo V&V by a peer review, an engineer, and the user of the procedure prior to approval.

Contrary to the above, as of April 24, 2006, procedure MTW-SOP-DIS-0100, "Distillation Startup," Revision 6, had not undergone a V&V by a user of the procedure prior to its approval. In addition, contrary to the above as of April 24, 2006, the procedure had not been reviewed by all disciplines, in that the Health Physics/Safety office had not reviewed the proposed procedure before the approval. These examples are identified as a violation (VIO 2006-005-01) for the failure to follow the plant implementation and development of plant technical procedures (SOPs) as required by NRC License No. SUB-526.

(2) <u>Conclusions</u>

A violation was identified for the failure to follow the requirements for the development and implementation of plant technical procedures.

d. Incident Investigation, Audits and Inspection (IPs 88065, and 88066)

(1) <u>Scope and Observations</u>

The inspectors reviewed the licensee's implementation of the 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.

The inspectors reviewed the licensee's audits performed for calender year 2005. Based on this review, the audits 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) <u>Conclusions</u>

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

- e. Follow-up on Previously Identified Issues and Events
- (1) (Discussed) Violation (VIO) 2005-004-01: Failure to implement the procedural requirements for an inoperative control room alarm procedure. As part of the corrective actions, the licensee re-trained the operators and supervisors to ensure compliance with the applicable procedure. The licensee issued a standing order to specifically require the UF₆ production supervisor and the process engineers to review unit log sheets, logbooks, and the inoperative alarm and instrument log.

In addition, the licensee planned to incorporate the standing order requirements into the applicable procedures and implement an overall alarm response and improvement project. The licensee had not completed those commitments due to other priorities. The inspectors noted that the licensee was tracking this issue in its open items list and had extended the original due date. However, the inspectors found that the extended due date had expired and that licensee personnel had not extended it until the inspectors requested information about the status of this item. This VIO remains open until the remaining corrective actions are completed.

(2) (Closed) Inspector Follow-up Item (IFI) 2005-006-01: Hydrogen analyzer interlock testing. The inspectors examined the preventive maintenance (PM) and functional test records for the hydrogen analyzers. The inspectors reviewed the records for the hydrogen analyzer testing. The licensee included in the applicable procedure the testing of the safety interlock mechanism for the hydrogen analyzers. This item is closed.

- (3) (Discussed) VIO 2005-006-02: Failure to insure control of control room procedures. The licensee plans to: (1) review the operator aids procedure; (2) train plant personnel on their responsibilities in the development, use, posting, review, and removal of operator aids; and (3) review all posted placards and documents in the FMB to meet the requirements of the operator aids procedure. The licensee was making progress towards the completion of these items. This VIO remains open until corrective actions are completed.
- (4) (Closed) VIO 2005-006-03: Failure to follow valve installation procedure and failure to follow line break procedure. (This item is related to NMED 050760). As part of the licensee's corrective actions for the small UF₆ release event on November 15, 2005, caused by failure to follow procedures for line breaks, the licensee revised the MTW-SAF-LS-0002, "Control of Hazardous Energy (lockout/Tagout)," and the MTW-SAF-LS-0007, "Line Breaking," procedures. The inspectors reviewed the licensee's corrective actions to prevent recurrence. The inspectors noted that the procedures met the intent of their corrective actions but it was less specific as stated in the response of the NOV submitted to the NRC. This item is closed.
- (5) (Discussed) IFI 2005-006-05: Valve numbers for Piping and Instrumentation Diagrams. The licensee was in the process of updating all diagrams of the FMB and incorporating the valve numbers into the diagrams. This item will remain open.
- (6) (Discussed) NRC Event No. 41879 (NMED No. 050499): Unplanned contamination event due to filter failure. The inspectors reviewed the status for the separation of the discharge stack for the Ash Vacuum System from the inlet plenum for the FMB fresh air ventilation system to prevent entrainment of any future releases into the ventilation system. The licensee's report stated that the action would be completed during the next scheduled plant outage in the second quarter of calendar year 2006. This item will remain open pending the licensee's completion the planned corrective actions.
- (7) (Discussed) NRC Event No. 41977 (NMED No. 050598): Elevated airborne contamination. The inspectors reviewed the licensee's corrective actions for the event that resulted in elevated concentrations of airborne radioactive materials that occurred on September 9, 2005 on the second floor of the FMB. The corrective actions were not yet complete, therefore this item will remain open
- (8) (Closed) NRC Event No. 42377: 10 CFR 21 30-Day Written Follow-up Report regarding a basic component failure of a rupture disc and corresponding safety head that could present safety hazards. The inspectors reviewed the status of the investigation of the other similar components. The licensee's evaluation of the other similar eighteen components determined that they were built to specification. The licensee returned the non-compliant component to the vendor. This item is closed.

f. Information Notice (IN) Review (Temporary Instruction 2600/012)

As part of the effort to review past generic communications, the inspectors verified that the conditions identified in IN-90-070, were not applicable at this facility.

3. Environmental Protection (IP 88045)

a. Management Controls and Quality Assurance

(1) <u>Scope and Observations</u>

The inspectors reviewed the implementation of the licensee's environmental program to determine if environmental monitoring was being implemented in accordance with the license requirements. The inspectors reviewed the procedures for the environmental protection program and the quality assurance audits performed by health physics during the past year. The Health Physics (HP) Supervisor, as delegated, completed the independent audits of programs and procedures required by the license conditions for the Management Assurance organization. The results of the program were reviewed by the As Low As Reasonably Achievable (ALARA) Committee which consisted of senior management and union personnel.

(2) <u>Conclusions</u>

Adequate management controls and quality assurance reviews were conducted in support of the environmental protection program.

b. Quality Control of Analytical Measurements

(1) Scope and Observations

The inspectors reviewed instruments used for the environmental monitoring and analysis program, the procedures used, and records, and discussed the program with licensee personnel. The inspectors observed the sampling of environmental air and water samplers in the field and the laboratory instruments and reviewed their operation, calibration and maintenance. The inspectors discussed the ongoing effort to upgrade and formalize the HP procedures supporting the environmental protection program. The licensee stated that the procedure update should be completed this year.

(2) <u>Conclusions</u>

The quality control program for analytical measurements was conducted adequately in support of the environmental monitoring and analysis program.

c. <u>Program Implementation</u>

(1) <u>Scope and Observations</u>

The inspectors reviewed the implementation of the environmental protection program. The inspectors toured the environmental monitoring stations for air, water, soil and vegetation, discussed the techniques and routines with the licensee, and observed the air and water sampling. The inspectors compared the semi-annual environmental sample results with historical ones and determined that they were consistent and were at or near background levels.

(2) <u>Conclusions</u>

The environmental protection program was being implemented in accordance with license requirements.

4. <u>Radioactive Effluents, and Low Level Radioactive Waste Programs (IPs 88035,</u> 84850, and 84900)

a. <u>Management Controls</u>

(1) <u>Scope and Observations</u>

The inspectors reviewed the licensee's management controls, audits performed, and the implementing procedures for the radioactive effluents and low level radioactive waste programs to ensure that the programs were being implemented in accordance with the license requirements and Appendix G of 10 CFR Part 20. The future plans for procedures and audits for the radioactive effluent and low level radioactive waste programs were discussed with management. A new revision to the license application and a new revision to the implementing procedures were in the process of being finalized to enhance management controls.

(2) Conclusions

Management controls and audits were adequate in support of the environmental protection program.

b. Radioactive Liquid and Airborne Effluents and Measurements

(1) <u>Scope and Observations</u>

The inspectors reviewed the licensee's program for the control and measurement of the releases of radioactive liquid and airborne effluents to the environment to ensure they were within 10 CFR Part 20 and the license requirements. The inspectors reviewed the licensee's procedures and controls for the sampling and measurement of stack and pond releases to the environment. Stack flow measurements were being performed by a vendor to ensure effluents were being properly characterized and reported. The

results indicated good correlation with past flow measurements. The calibration of instruments used to measure liquid flow releases from the pond were also performed by a vendor on an annual basis.

The inspectors reviewed the semi-annual release reports for the past year. The releases were a small fraction of the regulatory requirements. As discussed in Sections 3.b.(1) and 4.a.(1) above, the procedures for the administration of the radioactive liquid and airborne releases are also being upgraded as part of the licensee's long-term improvement program.

(2) <u>Conclusions</u>

The licensee's programs for the sampling, measurement and control of radioactive effluents to the environment were adequate. Procedure development and calibration of the stack flows were being performed to enhance the effluent monitoring program.

c. Waste Manifests, Classification, Form, Characterization, Labeling and Shipment

(1) <u>Scope and Observations</u>

The inspectors reviewed the implementation of the licensee's program for waste manifesting, waste classification, waste form and characterization, labeling and shipment for compliance with the requirements of Appendix G to 10 CFR Part 20 and 10 CFR Parts 61.55 and 61.56. The licensee was in the process of developing procedures for the implementation of the regulations and should be completed during calender year 2006.

The inspectors discussed the characterization of the waste and waste form and the classification of wastes with the licensee. The method used to determine the quantity of radionuclides shipped was discussed. The types of waste generated, the processing of the wastes, and the ultimate disposal of wastes were reviewed. Completed waste manifests and shipment records were also reviewed. No issues were identified.

(2) <u>Conclusions</u>

The implementation of the licensee's program for the characterization and manifesting of radioactive materials shipped was adequate, but no procedures existed for the program. The licensee stated they would develop procedures during calender year 2006 as part of its long-term performance improvement program being monitored by the NRC.

d. Low Level Radioactive Waste Storage

(1) <u>Scope and Observations</u>

The inspectors reviewed the licensee's procedure for the storage of low level radioactive waste, waste container integrity, solid radioactive waste processing, and disposal of the radioactive waste. The inspectors toured the waste storage areas and discussed future plans to reduce the radioactive waste inventory. The impact of recent heavy rain and the resultant standing water in the storage area was observed and discussed.

The licensee was in the process of installing a new drum crusher facility to reduce the inventory of used drums on the site. After the processing of the inventory is completed, the crusher will be moved to the ore dumping area for drum cleaning and crushing as part of the dumping process. The inspectors discussed the licensee's plans to reduce the inventory of deteriorating drums containing hard ore in storage. Plans are being developed to remove the ore from the drums for processing and dispose of the drums to reduce this inventory significantly during calender year 2006.

(2) <u>Conclusions</u>

The licensee's area for the storage of low level radioactive waste was adequately maintained and marked. The licensee has plans to significantly reduce the inventory of empty ore drums and drums containing hard ore during calender year 2006.

5. Exit Meeting Summary

The inspection results were summarized on May 4 and 12, 2006, and June 5, 2006 (by telephone), with licensee management representatives. The plant staff acknowledged the findings presented.

ATTACHMENT

1. PARTIAL LIST OF PERSONS CONTACTED OR ATTENDED EXIT MEETING

Licensee

- D. Dodge, Environmental Supervisor
- D. Edwards, Plant Manager
- T. Hall, Assistant Manager Maintenance Program
- B. Klinghammer, Union President
- N. Kowalczyk, Regulatory Affairs
- L. Litinski, Health Physics Specialist
- D. Mays, Health, Safety and Regulatory Affairs Manager
- B. Muiter, Training
- S. Patterson, Health Physics Supervisor
- J. Riley, Nuclear Regulatory Affairs Manager
- D. Steele, Supply Chain Accountant
- G. Stegman, Maintenance Representative
- B. Stokes, Health Physics Specialist
- B. Vandermeulen, Quality Assurance Manager

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

2. INSPECTION PROCEDURES USED

84850	Radioactive Waste Management - Inspection of Waste Generator
	Requirements of 10 CFR Part 20 and 10 CFR Part 61
84900	Low-Level Radioactive Waste Storage
88035	Radioactive Waste Management
88045	Environmental Protection
88056-66	Chemical Safety

3. ITEMS OPENED, CLOSED, AND DISCUSSED

Item Number	<u>Status</u>	Description
VIO 2005-004-01	Discussed	Failure to implement the procedural requirements for an inoperative control room alarm procedure (Section 2.e).
IFI 2005-006-01	Closed	Hydrogen analyzer interlock testing (Section 2.e).
VIO 2005-006-03	Closed	Failure to follow valve installation procedure and failure to follow line break procedure (Section 2.e).

VIO 2005-006-02	Discussed	Failure to insure control of control room procedures (Section 2.e).
IFI 2005-006-05	Discussed	Valve numbers for P&IDs (Section 2.e).
Event 41977	Discussed	Elevated airborne contamination (Section 2.e).
Event 41879	Discussed	Unplanned contamination event due to filter failure (Section 2.e).
Event 42377	Closed	10 CFR 21 30-Day Written Follow- up Report regarding a basic component failure of a rupture disc and corresponding safety head that could present safety hazards (Section 2.e).
VIO 2006-005-01	Open	Failure to follow the implementation and development of plant technical procedures (Section 2.c).

4. <u>LIST OF ACRONYMS USED</u>

ADAMS ALARA CFR DMS	Agency Document Access and Management System As Low As Reasonably Achievable Code of Federal Regulations
EMB	Feed Material Building
HP	Health Physics
IFI	Inspector Follow-up Item
IN	Information Notice
IP	Inspection Procedure
NMED	Nuclear Material Events Database
NOV	Notice of Violation
NRC	Nuclear Regulatory Commission
PARS	Publicly Available Records
SOP	Standard Operating Procedure
UF ₆	Uranium Hexafluoride
V&V	Verification and Validation
VIO	Violation