



~~71-3103~~
70-3103

JUL 26 2007
NEF-07-00115-NRC

ATTN: Document Control Desk
Director
Office of Nuclear Material Safety and Safeguards
U.S. Nuclear Regulatory Commission
11555 Rockville Pike
Rockville, MD 20852

Subject: Construction Site Access Training

Pursuant to the requirements of 10 CFR 70.55, Inspections, Louisiana Energy Services (LES) will afford any NRC Inspectors identified by the Director, Office of Nuclear Material Safety and Safeguards, as likely to inspect the facility, immediate unfettered access, equivalent to access provided regular plant employees, following proper identification and compliance with applicable access control measures for security, radiological protection, and personal safety.

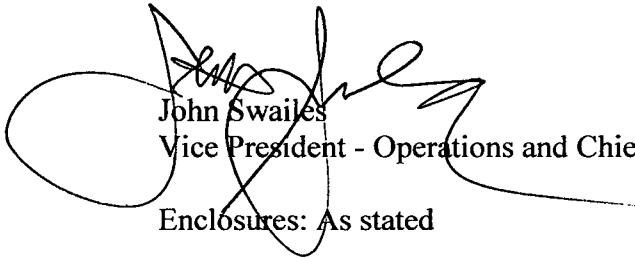
The National Enrichment Facility (NEF) is currently under construction. For this reason, it is important that both employees and visitors be aware of the site specific hazards associated with construction activities to ensure continued personnel safety. Therefore, LES requests that prior to accessing the NEF construction site, NRC Inspectors read and acknowledge the site specific safety training provided as an attachment. A copy of the training material and the training acknowledgement form are enclosed and are also available at the security trailer at the entrance to the NEF construction site.

To further facilitate access for NRC Inspectors, during the first visit to the NEF construction site and upon completion of the training acknowledgement form, NRC Inspectors can be issued site access badges. The site access badges signify that the construction site safety training has been completed. The badges can be retained by the NRC Inspectors during the entire inspection period but should be returned to the security trailer at the entrance to the NEF construction site upon completion of the visit.

NH501

If you have any questions, please contact Stephen Cowne at 505-394-4646.

Respectfully,



John Swailes
Vice President - Operations and Chief Nuclear Officer

Enclosures: As stated

Cc:

Regional Administrator
U.S. NRC Region II
Sam Nunn Atlanta Federal Center, 23 T85
61 Forsyth Street, SW
Atlanta, GA 30303-8931

Deborah A. Seymour
Chief, Construction Projects Branch 1
U.S. NRC Region II
Sam Nunn Atlanta Federal Center, 23 T85
61 Forsyth Street, SW
Atlanta, GA 30303-8931

Timothy Johnson
Project Manager,
Enrichment & Conversion Branch T-8F42
Division of Fuel Cycle Safety and Safeguards
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Title:	National Enrichment Facility Self Study Material for NRC Personnel Site Access Training General Employee Training	
Guide No.:	DB001I100I00	Rev: 1
Author :	C. Bates	Date: 6-29-07
Revised By :	C. Bates	Date: 7/19/07
Training Supervision Review:	* Signature on file	Date: 7/19/07
Program Owner Approval:	* Signature on file	Date: 7/19/07

LEARNING OBJECTIVES

Terminal Objective

Satisfy the National Enrichment Facility Site specific knowledge requirements for unescorted access (badging) of NRC personnel

Enabling Objectives

- K01 Review LES Quality Assurance Program
- K02 Review LES Corrective Action Program
- K03 Review LES Safety Conscious Work Environment Program
- K04 Review LES ECI and Classified Documents requirements
- K05 Review WGI Quality Assurance Program
- K06 Review WGI Construction Site Safety Requirements

PERFORMANCE OBJECTIVES

None

TASK REFERENCES

None

MATERIALS AND EQUIPMENT

PowerPoint presentation

ACTIVITIES

Activity 1 - Learning Activities

Activity 2 - Individualized-Instruction Completion Record



NATIONAL
ENRICHMENT
FACILITY

ACTIVITY 1 – LEARNING ACTIVITIES

I. Preparation

- The student should obtain a copy of the PowerPoint presentation

II. Performance

- Review the PowerPoint presentation
- Ensure that you understand the information associated with each objective

III. Completion

- Discuss the information contained in the PowerPoint as it relates to the learning objectives with evaluator.
- The evaluator should document satisfactory completion on Activity 2.



NATIONAL
ENRICHMENT
FACILITY

Activity 2 – Individualized-Instruction Completion Guide

Trainee Name:	
Trainee ID:	N/A
Trainee E-Mail:	N/A
Trainee Phone No.	N/A
Module Title:	Self Study for NRC Personnel Site Access Training GET
Module No. / Rev.:	DB001II00I00 Rev. 1
Course Code / Rev.:	DB001II00I00

Trainee Acknowledgment:

- I have read and understand the objectives of the above referenced training material.

Trainee:

Signature

Date

Evaluation:

- This individualized instruction contains self-study material for the NRC. In this case, the Trainee Acknowledgement satisfies the evaluation requirements.

Comments:



NATIONAL
ENRICHMENT
FACILITY

National Enrichment Facility Self Study Material for NRC Personnel Site Access Training General Employee Training

NEF Training Department

July 19, 2007

DB001II00I00

Rev. 1



Introduction

- This self study material includes training required for unescorted access to the National Enrichment Facility (NEF), located in Eunice, New Mexico.
- Includes Louisiana Energy Services, LP (LES) developed General Employee Training
- Includes Washington Group International (WGI) developed Site Access Training

Introduction

- Site Contact Numbers

- | | |
|----------------------------------|--------------|
| – Site Emergencies (Day Shift) | 505-394-5555 |
| – Site Emergencies (After Hours) | 505-394-5483 |
| – RUST Safety | 505-394-5555 |
| – LES Security | 505-394-5483 |
| – WGI Quality Manager | 505-394-5121 |
| – RUST Environmental | 505-602-0208 |
| | 505-602-0113 |
| – LES Training | 505-492-2657 |
| – WGI Training | 505-394-4042 |

Introduction

- Addresses

- Administrative Offices:
1008 12th Street
P.O. Box 1789
Eunice, NM 88231
Phone: 505-394-4646
Fax: 505-394-4545
- Public Information Office:
1323 Main Street
P.O. Box 1789
Eunice, NM 88231
Phone: 505-394-0156
Fax: 505-394-0175

Introduction

- Directions from Midland International Airport, Midland-Odessa, TX
(Drive: 76.7 mi – about 1 hour 34 mins)
 - Head **north** on **Laforce Blvd/La Force Rd** toward **TX-217-LOOP**
(0.5 mi - 2 mins)
 - Turn **right** at **TX-217-LOOP** (signs for **I-20/FM-1788**)
(0.7 mi - 2 mins)
 - Turn **right** at **FM-1788/N FM-1788** & Continue to follow FM-1788
(29.5 mi - 32 mins)
 - Turn **left** at **TX-176** - Entering New Mexico
(40.3 mi - 46 mins)
 - Continue on **NM-234**
(2 mi – 3 mins)
 - Turn **right** at **NEF Site Main Gate**
 - Continue on **NM-234**
(3.5 mi - 7 mins)
 - Turn **right** at **12th St**
(0.1 mi - 1 min)
 - **Administrative Office - 1008 12th St, Eunice, NM 88231**

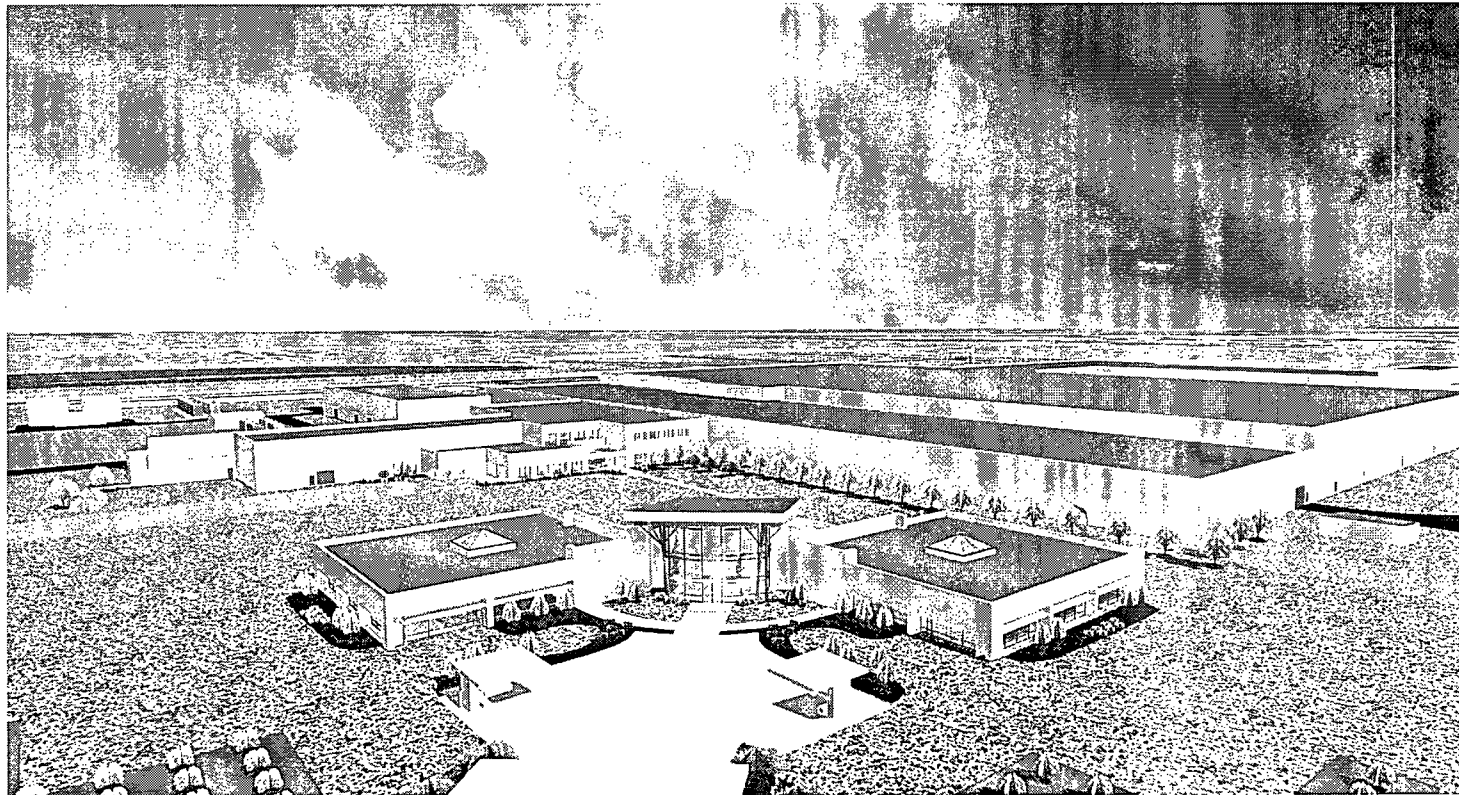
Terminal Objective

Satisfy the National Enrichment Facility Site specific knowledge requirements for unescorted access (badging) of NRC personnel

Enabling Objectives

- Review LES Quality Assurance Program
- Review LES Corrective Action Program
- Review LES Safety Conscious Work Environment Program
- Review LES ECI and Classified Documents requirements
- Review WGI Quality Assurance Program
- Review WGI Construction Site Safety Requirements

LES General Employee Training



LES Quality Assurance

Quality Assurance

Definition

- **Planned and systematic actions necessary to provide adequate confidence that items relied on for safety (IROFS) are available and reliable to perform their functions when needed.**
- **Includes quality control (QC)**
 - actions related to the physical characteristics of an IROFS.

Quality Assurance

Purpose

- Provides Reasonable assurance of protection of public and worker health and safety and the environment.
- Ensures IROFS will be available and reliable when needed including active features, passive features such as those which are safe by design and administrative features controlled by LES procedures.
- Ensure License Commitments are met by providing independent (of cost and schedule) assessments for LES management.

Quality Assurance

Description

- Approved by the NRC on April 9, 2004, in advance of the license issuance on June 23, 2006.
- The elements of the QA Program described in the QAPD in conjunction with associated procedures implement the requirements of 10CFR50, Appendix B and ASME Standard NQA1-1994 with NQA-1a-1995 Addenda.

Quality Assurance

Description

- Appendix A of the Safety Analysis Report (SAR).
 - Describes the basic policies of the QA Program established by the LES President and to be implemented by all members of the LES organization.
 - Assigns responsibilities and specifies requirements governing implementation.
 - Applies to NEF design, construction, operation, and decommissioning.

Quality Assurance

Scope

The scope of the Quality Assurance Program Includes:

- Design, Construction, Operation, Decommissioning
- All levels of the organization, including contractors
 - Contractors must conduct activities under the LES QA Program or under a QA Program approved by the LES QA Director.

Quality Assurance

Construction Phase

- The QAPD applies during the construction phase of the NEF project; however, much of the actual work may be done by organizations who are working under contract with LES.
- Contractors may establish their own QA program and procedures. These will be reviewed and approved by LES staff as part of the contract development and implementation to ensure they are consistent with our License commitments.
 - Sometimes contractors may work directly under the LES QA program and procedures.
 - *As an example, contractors who provide staff for LES positions are often governed by an agreement which tells these people they are to perform their work as if they were an actual LES employee.*
 - Sometimes contractors will work under their own, approved QA Program and procedures.
 - *The contractor's QA program and procedures are then the governing quality assurance practices and processes for the contractor's work.*
 - In this manner, the LES QA program provides either direct oversight of work being performed, or oversight of the contractor QA programs which provide direct oversight of their work

LES Corrective Action Program (CAP)

Corrective Action Program

Description

- The purpose of CAP:
 - Identify
 - Report
 - Investigate
 - Track
 - Resolve

“Adverse Conditions”

Corrective Action Program

Definition

An Adverse Condition is a:

- Deficiency
- Failure
- Malfunction
- Deviation
- Abnormal occurrence
- Defective material
- Defective equipment

in activities or services that has affected or reasonably could affect nuclear/chemical safety or quality.

Corrective Action Program

Definition

Condition Report

The general term used to describe the report of any documented Adverse Condition. There are 4 Levels of Condition Reports:

Level 1

- A Significant Condition Adverse to Quality requiring a formal root cause investigation

Level 2

- A Condition of sufficient significance to determine the Apparent Cause

Level 3

- An Adverse Condition with low significance – Fix and Trend

Level 4

- Good Idea, betterment item

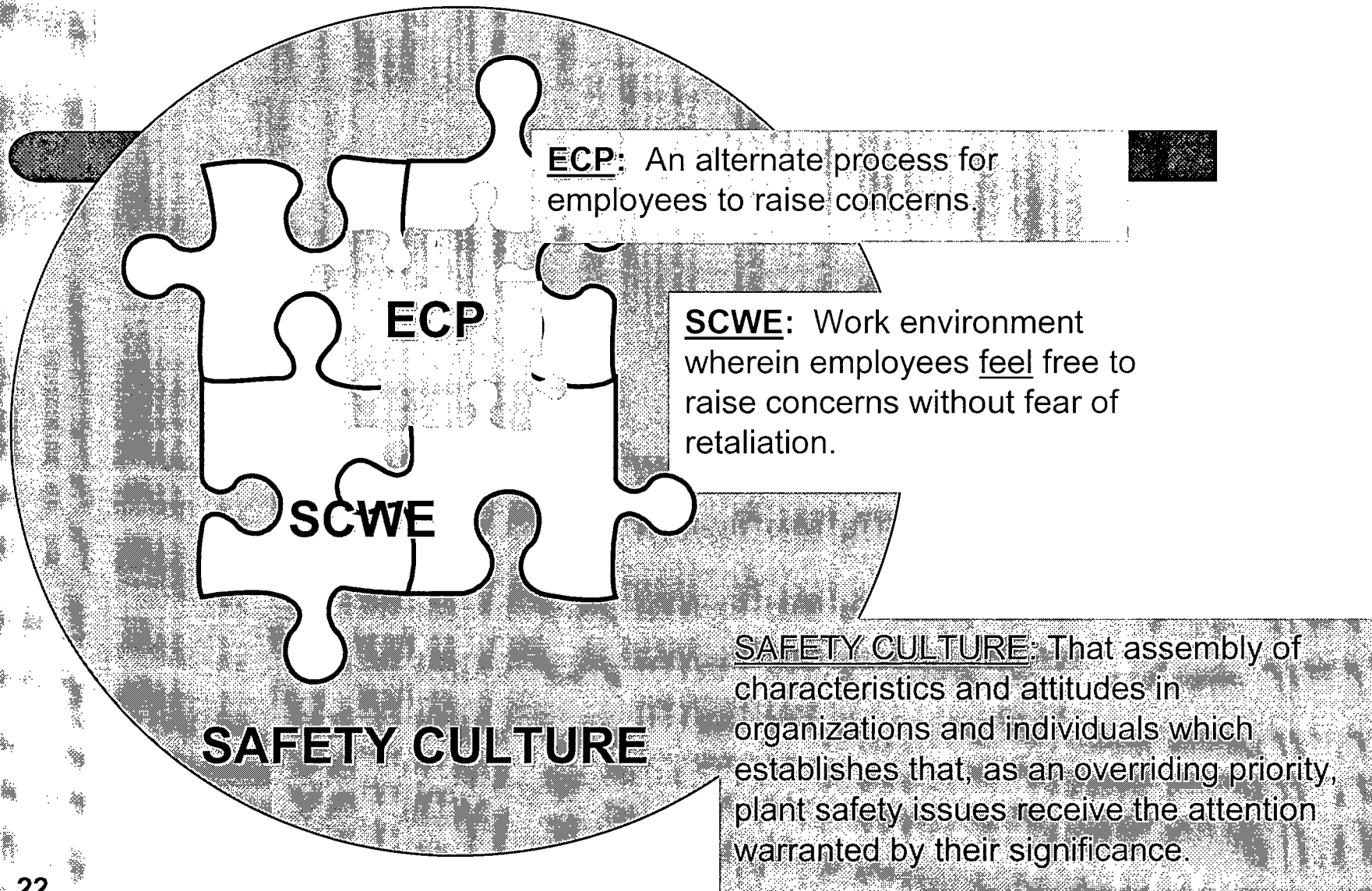
LES Safety Conscious Work Environment (SCWE)

Safety Conscious Work Environment

LES SCWE Policy Intent

- Employees feel free to express concerns
 - to their immediate supervision
 - using the Corrective Action Program (CAP)
 - to the Employee Concerns Program
 - to the NRC

Graphical Depiction: Relationship between Safety Culture, Safety Conscious Work Environment (SCWE), and Employee Concerns Program (ECP)



Safety Conscious Work Environment

SCWE Implementation

- Work environment encourages employees to promptly raise concerns without fear of retaliation from their supervisors, managers, or peers
- Managers and supervisors promote employee confidence in raising concerns
- If they opt not to report their concern to their management or use the Employee Concerns Program (ECP), employees are encouraged to report their concerns to the NRC
- LES is responsible for having its contractors maintain an environment in which their employees are free to raise concerns without fear of retaliation (a SCWE)

LES Export Control Information (ECI) and Classified Documents

ECI and Classified Documents

Purpose

- NEF uses various levels of classification of documents and it is important for NEF employees, contractors, sub-contractors, and vendors to be familiar with the documents that are used at NEF.

ECI and Classified Documents

Export Control Information

- Any documentation or verbally transmitted information that cannot be released to foreign nationals or representatives of a foreign entity without obtaining approval or license from:
 - US State Department; or
 - the appropriate authority in the country of origin.

ECI and Classified Documents

Dual Use Information

- Dual Use information involves information or matter that has both commercial and military use applications.
- Dual use information is *one* type of ECI.
- At NEF, all ECI is Dual use. Thus, these terms may be used interchangeably.
- ECI does not require a security clearance. However, there are access restrictions stated in SY-109-110.

ECI and Classified Documents

Need to Know and Deemed Export

- Need to Know
 - Access to information must be necessary for the conduct of one's official business
- Deemed Export
 - The discussion of ECI with foreign nationals. The information has been propagated outside the country of origin.

ECI and Classified Documents

Restricted Data (RF)

- Defined in 10 CFR 95.5 – All data concerning design, manufacture or utilization of atomic weapons, the production or nuclear material, or the use of special nuclear material in the production of energy....”
- In Europe, Centrifuge Technology is called “ATOLL”

ECI and Classified Documents

Classified Information

- Information that has been classified pursuant Presidential Executive Order 12958, Classified National Security Information.

ECI and Classified Documents

Safeguards Information

- Information which specifically identifies a licensee's detailed security measures for the protection of Special Nuclear Material (SNM) or the security measures for the physical protection and location of facility equipment vital to the safety of the facility, is considered safeguards information

ECI and Classified Documents

Compromised Information

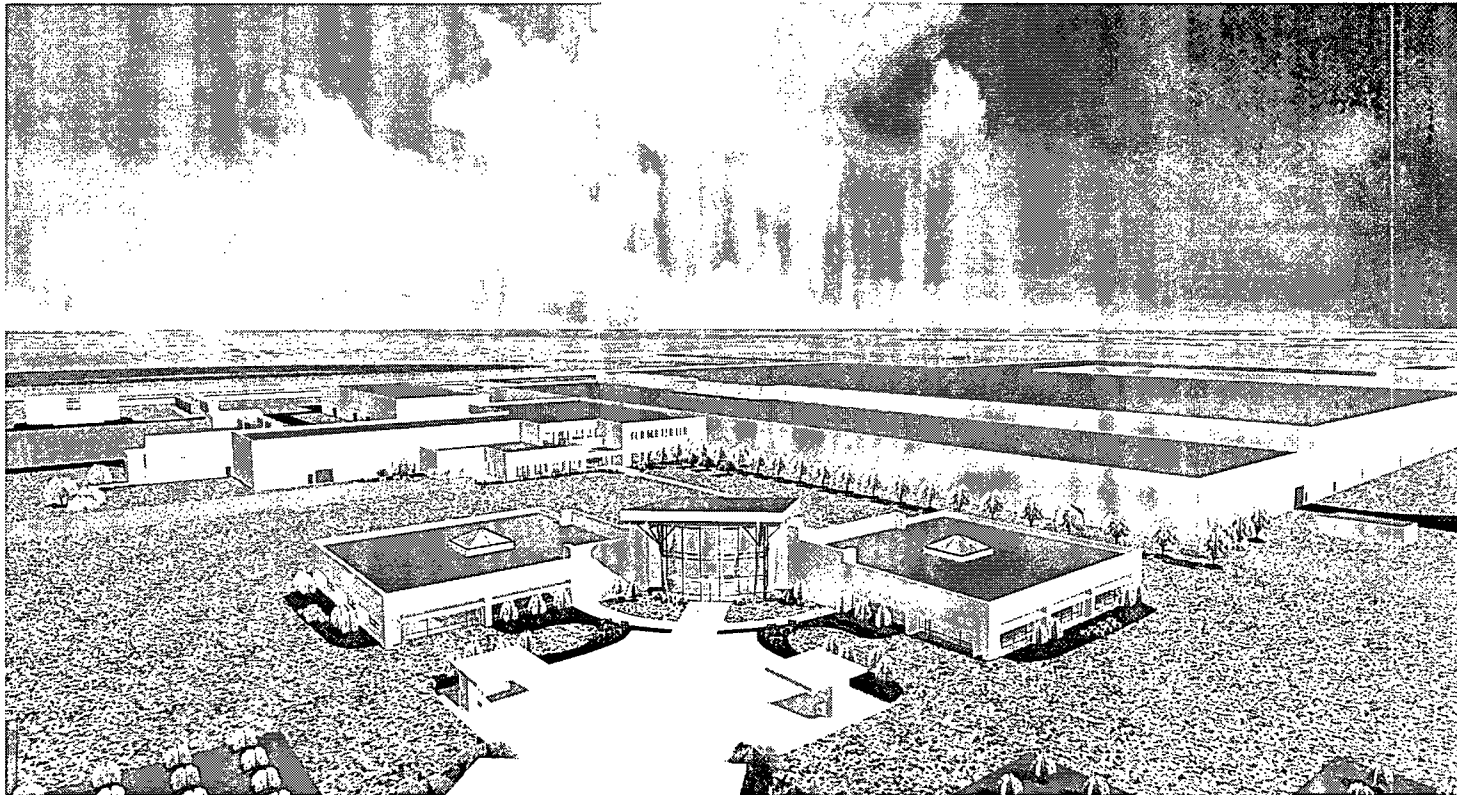
- If there is any actual or suspected loss, exposure, or compromise of ECI, the NEF Security Supervisor shall be contacted immediately.

ECI and Classified Documents

Use and Storage of ECI

- Use of ECI
 - ECI shall not be left unattended once it is removed from a locked storage container.
 - ECI shall not be transmitted by electronic telecommunications circuits (e.g., faxed or discussed over the telephone) unless IAW Procedure SY-109-110
- Storage of ECI
 - ECI must be stored in a locked storage container (i.e., kept under lock and key) while unattended.
 - A locked storage container may be:
 - a locked desk drawer,
 - locked standard file cabinet, or
 - other typical locked office container.
 - Hotel in-room safe may be used as a locked storage container when transporting ECI.
- ECI Data Storage
 - Stand-Alone LES computers
 - The computer system or electronic media (e.g., laptop or flash drives) containing ECI must be encrypted.
 - Electronic media must be controlled by user per SY-109-110 or stored in acceptable ECI storage location.

WGI/Rust Site Access Training



Construction Site Quality Assurance

Construction Site Quality Assurance

Postings

- Required Postings
 - 10 CFR Part 19, Notices, Instructions and Reports To Workers: Inspections and Investigations.
 - 10 CFR Part 20, Standards For Protection Against Radiation
 - 10 CFR Part 21, Reporting of Defects and Noncompliance
 - Regulatory Posting Sheet (Pursuant to 10 CFR 19.11 and 10CFR 21.6)
 - NRC FORM 3. (English/Spanish) Notice to Employees/ Standards For Protection Against Radiation
 - SECTION 206. Energy Reorganization Act, 1974, Noncompliance
 - NRC Letter # IN-07-00052 (05/02/07). Review of Integrated Safety Analysis Changes and Amendments of License, etc.
- Locations
 - Rust Training/In-Processing Facility in Eunice
 - On site at Gate #1
 - On site at Gate #2
 - On site at Trailer 2-12 (north end)

Construction Site Quality Assurance

Quality Assurance Program

- *10CFR50 Domestic Licensing of Special Nuclear Material*
- *ASME NQA-1 Quality Assurance Requirements for Nuclear Facilities.*
- *WGI Nuclear Quality Systems Manual*
 - *Corporate level document that describes how WGI will comply with ASME NQA-1*
- *WGI Project Quality Assurance Plan*
 - *Augments the Corporate manual by addressing project specific requirements.*

Construction Site Quality Assurance

Quality Assurance Program

- **Implementing Procedures**
 - **Administrative Bulletins (ABs)**
 - *Corporate Level documents applicable to all levels of the organization. Example: "Employee Concerns"*
 - **Standard Quality Procedures (SQPs)**
 - *Standard Corporate Level generic procedures applicable to all nuclear projects. Applies primarily to QA/QC personnel.*
 - **Project Specific Procedures (PSPs)**
 - *Developed at the project to describe how the work we perform will comply with the WGI Nuclear Quality Systems Manual and Project Quality Assurance Plan.*
- **Work Plans**
 - *Developed at the project to identify discrete scopes of work and the applicable requirements.*
 - *Primarily a place holder for test and survey reports.*
- **Specifications**
 - *A technical design document that prescribes material, dimensions, technical and workmanship requirements.*
- **Drawing**
 - *A pictorial representation of the building or facility to be built. Includes technical requirements, dimensions, general notes, etc.*

Construction Site Safety

Construction Site Safety

Job Safety

- **“NO” one is exempt from safety.**
- **Zero tolerance policy for safety violations.**
- **Failure to comply with safety requirements will result in disciplinary action up to and including termination.**
Frequency and severity -> verbal warning to termination

Construction Site Safety

General Site Safety

- Access road
 - Night driving– light dimmed, wipers off
 - Speed limit is 15 mph
 - No cell phone use
 - No Personal Vehicles permitted past the contractors office trailer area
- Parking Lot
 - Maintain fire lanes
 - Park in designated parking spaces
 - Do not block dumpsters, conexs, or electrical equipment.
- Office complex
 - PPE not required
 - Smoking is not permitted in trailers, restrooms or on decks

Construction Site Safety

Severe Weather

- Each trailer has a Trailer Warden who will account for all personnel
- All field work will be secured if there are lightening strikes within 12 miles of the site and you will seek shelter
- In the case of severe storm/tornado, Rust management will make the determination to either evacuate the site or take shelter. The best shelter on site is the trailers

Construction Site Safety

Signs and Barricades

- **Danger** (Red Tape and have sign/tag)
 - Do not enter
 - To Enter –Contact person who put red tape up for permission.
 - Red must be removed as soon work is complete
- **Caution** (Yellow Tape)
 - Limited Access
 - Understand Danger
 - Have Permission from work zone
- **Signs must have Name and Description**
 - Contact Information
 - Description of Hazard

Construction Site Safety

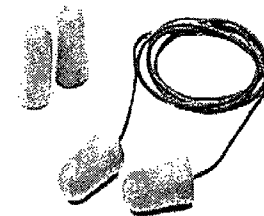
Fire Prevention

- Keep combustibles away from heat sources – move or cover with fire retardant blankets.
- Maintain good housekeeping and dispose of oily rags in a properly Labeled container.
- Minimize gasoline or other combustible liquids in or near work areas and store in “approved” containers and cabinets.
- Smoke in designated areas only.
- Radio/Call Safety in event of an emergency - give your name, nature and location of the emergency.
- All “HOT WORK” (burning , welding and grinding or other activity which may create an ignition source) shall be performed in compliance with SP 11.00 “Fire Prevention and Protection.”

Construction Site Safety

Hearing Protection

- Required when:
 - Area is posted
 - Posting will provide type of protection required.
 - When an employee's noise exposure exceeds an 8-hour time-weighted average (TWA) sound level of 85 dBa.



Construction Site Safety

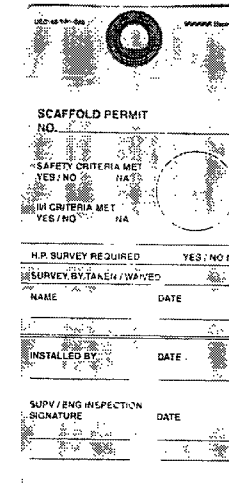
Foot Protection

- Safety shoes are to be worn where signs are posted or as required by the company.
- A sturdy industrial grade work boot, with a hard sole, is required.

Construction Site Safety

Scaffolding

- Scaffolds must be inspected and the tag signed each shift.
- Scaffold Access Training must be completed to access scaffolding
- LIME GREEN tag: indicates the scaffold is OSHA compliant.
- YELLOW tag: indicates the scaffold can be used with restrictions due to a potential hazard.
- RED tag: NO ACCESS



SCAFFOLD PERMIT
NO. _____

SAFETY CRITERIA MET
YES / NO _____

HAZARD CRITERIA MET
YES / NO _____

H.P. SURVEY REQUIRED YES / NO / NA _____

SURVEY BY: TAKER / WAVED
NAME _____ DATE _____

INSTALLED BY _____ DATE _____

SUPV / ENG INSPECTION
SIGNATURE _____ DATE _____

CAUTIONS/RESTRICTIONS

FALL PROTECTION
REQUIRED!
INCOMPLETE
SCAFFOLD

DO NOT USE!
ONLY INSTALLERS
ALLOWED ON THIS
SCAFFOLD

Construction Site Safety

Living Hazards

- Living Hazards found at the NEF Site may include:
 - Poisonous Plants
 - Poison Ivy
 - Poison Oak
 - Poison Sumac
 - Poisonous & Disease Carrying Insects
 - Black Widow & Brown Recluse Spiders
 - Ticks & Mosquitoes
 - Bees, Wasps, & Yellow Jackets
 - Scorpions & Fire Ants
 - Snakes
 - Animals
 - Raccoons, Skunks, Dogs



Construction Site Safety

Excavation Safety

- Ear plugs and florescent vest will be required while working around earth moving equipment
- All earthmoving equipment has the “Right of Way” and is equipped with warning Systems (backup alarms)

Construction Site Safety

Fall Protection

- This project requires 100% fall protection if you can fall more than 6 or more feet, or less if over a exposed hazard
- Protective measures include guardrails, covers, and Personal Fall Arrest Systems
- Safety line anchorage must be independent of any platform anchorage and capable of supporting at least 5,000 lbs. per worker



**This concludes the
NEF Site Access Material
for NRC Personnel.**

