

October 12, 2007

E. Kurt Hackmann, Director
Hematite Decommissioning Project
Westinghouse Electric Company
Nuclear Fuels
3300 State Road P
Festus, MO 63028

SUBJECT: NRC INSPECTION REPORT 070-00036/07-01(DNMS) - WESTINGHOUSE
ELECTRIC COMPANY (HEMATITE) AND NOTICE OF VIOLATION

Dear Mr. Hackmann:

On September 13, 2007, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection at the Westinghouse Hematite decommissioning facility. The purpose of the inspection was to determine whether decommissioning activities were conducted safely and in accordance with NRC requirements. Specifically, the inspection focused on management organization and controls, radioactive waste management, transportation activities, and effluent control and environmental protection. At the conclusion of the on-site inspections on September 13, 2007, the NRC inspectors discussed the preliminary findings with you and members of your staff.

This inspection was an examination of activities conducted under your license as they relate to safety and compliance with the Commission's rules and regulations and with the conditions of your license. Within these areas, the inspection consisted of selected examination of procedures and representative records, observations of activities, and interviews with personnel.

Based on the results of this inspection, the NRC has determined that three Severity Level IV violations of NRC requirements occurred. The violations were evaluated in accordance with the Enforcement Policy. The current Enforcement Policy is included on the NRC's Web site at <http://www.nrc.gov>; select **What We Do, Enforcement, the Enforcement Policy**. One violation involved three examples of failures to conduct licensed activities due to a lack of management focus. The examples included a failure to follow an approved work plan, a failure to conduct an annual internal audit, and a failure to provide a project management chart to a Project Management Plan. A second violation involved several failures to maintain the license consistent with changing site conditions and activities. A third violation involved a failure to properly label containers containing radioactive materials. While individually these failures were not of high safety significance, together they indicate a lack of adequate management attention

to ensure that activities at the facility are conducted in accordance with license requirements. The violations are cited in the enclosed Notice of Violation (Notice) and the circumstances surrounding them are described in detail in the subject inspection report. The violations are being cited in the Notice because the NRC identified the issues.

In addition to the above mentioned violations, a number of other performance deficiencies were identified that, while not violations of NRC requirements, are issues that raise concerns about management effectiveness and involvement. For example, a surveillance team, while evaluating the burial pit investigation work, failed to identify that the work crew was not following the latest revision of the work plan which had been previously provided to NRC and State officials. In addition, NRC inspectors identified concerns with depressions and holes in the burial pit area that were a repeat of concerns raised over one year ago and no actions had been taken. Also, a review of issues entered into your corrective action program shows a history of instances where licensing requirements, policies, and procedures were not followed.

These issues, coupled with the violations, raise concerns regarding the overall conduct of your decommissioning activities and the effectiveness and involvement of management. Therefore, we request that you include, as part of your written response to the Notice of Violation, a discussion of those actions that you plan to take to improve the conduct of decommissioning activities at your facility.

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 accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter and its enclosures will be available electronically in the NRC Public Document Room

E. Hackmann

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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 by K. O'Brien Acting for/

Steven A. Reynolds, Director
Division of Nuclear Materials Safety

Docket No. 070-00036
License No. SNM-00033

Enclosures:

1. Notice of Violation
2. Inspection Report 070-00036/07-01(DNMS)
3. Excerpt from NRC Information Notice 96-28

cc w/encls: D. Childers, Director, Missouri Department of Natural Resources
 R. A. Kucera, Director, Intergovernmental Cooperation
 Missouri Department of Natural Resources
 B. Moore, Missouri Department of Natural Resources

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Letter to E. Kurt Hackmann from Steven A. Reynolds dated October 12, 2007

SUBJECT: NRC INSPECTION REPORT 070-00036/07-01(DNMS) - WESTINGHOUSE
ELECTRIC COMPANY (HEMATITE) AND NOTICE OF VIOLATION

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M. Satorius, RIII

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NOTICE OF VIOLATION

Westinghouse Electric Company-Hematite, LLC
Hematite, Missouri

Docket No. 070-00036
License No. SNM-00033

During an NRC inspection conducted from September 11 through September 13, 2007, violations of NRC requirements were identified. In accordance with the Enforcement Policy, the violations are listed below:

1. Condition 16 of License No. SNM-00033 requires, in part, that the licensee conduct its program in accordance with the statements, representations, and procedures contained in the referenced documents, including any enclosures. License Condition 16.A references Chapter 2 of the license application, "Organization and Administration," dated May 12, 2005.

Section 2.8.2 of Chapter 2 of the license application states, in part, that "the preparation, issue, and change of documents that specify quality requirements or prescribe activities affecting quality shall be controlled to ensure that current and correct documents are being employed by those performing the work. A system shall be established and implemented for the control of documentation. The system shall assure that current and correct documents are available to project personnel.

Section 2.8.4 of Chapter 2 of the license application states, in part, that "Internal audits shall be performed annually or more often."

Section 2.8.4 of Chapter 2 of the license application states, in part, that "A Project Management Plan shall be maintained which includes . . . a description of the reporting hierarchy within the decommissioning project management organization, including a chart or diagram showing the relationship of each decommissioning project unit to other project units and decommissioning project management."

Contrary to the above, the licensee failed to provide adequate management attention to ensure that licensed activities were conducted in accordance with Chapter 2 as evidenced by the following examples:

- a. On November 15, 16 and 17, 2006, the licensee conducted burial pit sampling activities using Revision 0 of Work Plan EO-06-004, Work Plan for Buried Waste Investigation at the Hematite Site, instead of Revision A, which was issued on October 27, 2006.
- b. The licensee failed to perform an internal audit since 2005, a period greater than one year.
- c. On September 11, 2007, the licensee did not have a Project Management Plan which contained a project management chart or diagram.

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

2. Condition 16 of License No. SNM-00033 requires, in part, that the licensee conduct its program in accordance with the statements, representations, and procedures contained in the referenced documents, including any enclosures. License Condition 16. A references Chapter 5 of the license application, "Environmental Protection," dated August 2, 2001.

Section 5.1.2 of Chapter 5 of the license application states, in part, that "Exhaust air effluents from process areas and process equipment shall be sampled continuously. These stack samples shall be changed at least weekly." Table 5-1 of Chapter 5 of the license application identifies the air effluent exhaust stacks and conversion offgas stack as the sampling points requiring continuous collection and weekly analysis.

Section 5.2 of Chapter 5 of the license application states, in part, that "Environmental samples shall be collected and analyzed as shown in Table 5-1." Table 5-1 of Chapter 5 of the license application identifies the plant well ground water as a sampling point requiring monthly collection and analysis.

Contrary to the above, the licensee failed to provide adequate management attention to ensure that license requirements in Chapter 5 were being maintained to reflect site conditions and activities as evidenced by the following examples:

- a. The licensee ceased sample collection and analysis of air effluent from the exhaust stacks and conversion offgas stack in December 2005 after these stacks were removed, but failed to revise Chapter 5 of the license to reflect the change in site conditions.
- b. The licensee ceased to collect and analyze plant well ground water in December 2005 after the licensee stopped using this well, but failed to revise Chapter 5 of the license to reflect the changed site activity.

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

3. Title 10 CFR 20.1904(a) requires the licensee to ensure that each container of licensed material bears a durable, clearly visible label bearing the words "CAUTION, RADIOACTIVE MATERIAL," or "DANGER, RADIOACTIVE MATERIAL." The label must also provide sufficient information (such as the radionuclide(s) present, an estimate of the quantity of radioactivity, the date for which the activity is estimated, etc.) to permit individuals handling or using the containers, or working in the vicinity of the containers, to take precautions to avoid or minimize exposures.

Contrary to the above, on September 11, 2007, six containers of recyclable metals contaminated with uranium-235 did not bear a label that identified the radionuclide(s) or the quantity of radioactivity, nor did it otherwise bear sufficient information to permit individuals handling or using the container, or working in the vicinity of the container, to take precautions to avoid or minimize exposure.

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

Pursuant to the provisions of 10 CFR 2.201, Westinghouse Electric Company-Hematite, LLC 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: (1) the reason for the violation, Notice of Violation or, if contested, the basis for disputing the violation or severity level, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. If an adequate reply is not received within the time specified in this Notice, an order or a Demand for Information may be issued as to why the license should not be modified, suspended, or revoked, or why such other action, as may be proper, should not be taken. Where good cause is shown, consideration will be given to extending the response time.

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 2.390(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 two working days.

Dated this 12th day of October 2007

U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Docket No.: 070-00036

License No.: SNM-00033

Report No.: 070-00036/07-01(DNMS)

Licensee: Westinghouse Electric Company

Facility: Former Hematite Fuel Manufacturing Facility

Location: 3300 State Road P
Festus, Missouri

Dates: September 11 through 13, 2007

Inspectors: William Snell, Senior Health Physicist, Region III
Bruce Watson, Senior Health Physicist, FSME

Approved by: Patrick L. Loudon, Chief
Decommissioning Branch, DNMS, RIII

EXECUTIVE SUMMARY

Westinghouse Electric Company, LLC HEMATITE FUEL MANUFACTURING FACILITY NRC Inspection Report 070-00036/07-01(DNMS)

This inspection evaluated the Westinghouse Electric Company's performance related to management organization and controls, radioactive waste management, transportation activities, and effluent control and environmental protection. The inspection also included a review of licensee activities related to a recent issue involving the degradation of a sewer effluent release pipe.

Management Organization and Controls

- The buildings were being adequately maintained, but concerns were identified regarding potential effects of water intrusion into the burial pits through animal holes and depressions in the soil covering the burial pit area. Three examples of one violation were identified concerning: a failure to use a correct work plan; a failure to conduct an annual audit; and a failure to meet a license requirement in that an organization chart was not provided in the Project Management Plan. These failures were the result of inadequate management attention to ensure licensed activities were conducted in accordance with license requirements. The licensee initiated corrective actions on each of these issues by the end of the inspection. (Section 1.0)

Effluent Control and Environmental Protection

- The licensee was complying with the environmental monitoring commitments specified in Chapter 5, Environmental Protection, of the license with two exceptions, which resulted in a violation for failing to implement license requirements. The two examples included a failure to collect and analyze samples from an on site water well, and a failure to collect and analyze samples from the plant air discharge stacks. Both of these examples concerned the licensee's failure to amend the license as necessary to keep up with changing plant conditions. The licensee's actions taken to date to investigate a sewer line in which the discharge flow had significantly slowed for no known reason were adequate. (Section 2.0)

Radioactive Waste Management and Transportation Activities

- No deficiencies were identified in the shipping documents for twelve shipments of radioactive waste. One violation was identified for the failure to provide radioactive material labels on sea-land containers and intermodals containing contaminated metals for recycling. (Section 3.0)

Report Details¹

1.0 Management Organization and Controls (88005)

a. Inspection Scope

The inspectors conducted tours of the site grounds and buildings to evaluate the condition of the site and structures. The inspectors reviewed license requirements specified in Chapter 2, Organization and Administration, of the license to determine if policies and procedures were being followed and audits completed as required.

The inspectors reviewed six supplier/vendor audits performed by the licensee between October 2006 and April 2007, and four surveillances performed during November and December 2006. The inspectors also reviewed copies of required annual management internal audits, and plant organizational charts.

b. Observations and Findings

Tours of the buildings identified no animal or bird intrusions, and only minor instances of water leakage were observed. It was unknown how deep the animal holes were, but the holes and depressions appeared to provide a pathway for water to collect and seep downward into the buried waste, potentially increasing the rate of migration of radioactive contaminants from the burial site. This site condition had been raised by the NRC a year and a half earlier and no action had been taken. By the end of the inspection the licensee had filled in the animal holes and committed to perform a hydrological engineering analysis on the prolonged intrusion of surface water from rain water into the burial pit area to determine if any additional action is warranted.

Three surveillances were performed on November 15, 16, and 17, 2006, for burial pit sampling activities. Site personnel performed these surveillances for work being performed under Revision 0 of Work Plan EO-06-004, Work Plan for Buried Waste Investigation at the Hematite Site. However, Revision 0 was replaced by Revision A to this work plan, which was issued on October 27, 2006. Revision A included changes to the Data Quality Objectives that supported the Work Plan goals. Not only were the workers not following the recently revised version of the work plan, but site quality auditors also failed to recognize that site personnel were using the incorrect version of the work plan and performed the surveillance to Revision 0. The use of the incorrect version of Work Plan EO-06-004 is a violation of license Section 2.8.2, Document Control, which specifies that, "The preparation, issue, and change of documents that specify quality requirements or prescribe activities affecting quality shall be controlled to ensure that current and correct documents are being employed by those performing the work. . . . A system shall be established and implemented for the control of documentation. The system shall assure that current and correct documents are available to project personnel." (VIO 07000036/07-01-01)

¹ A list of acronyms used in the report is included at the end of the Report Details.

During the inspection the inspectors asked the licensee to provide a copy of the previous internal audit report. In searching for the audit report the licensee determined that it had failed to perform an internal since 2005. This was contrary to license Section 2.8.4, Surveillances and Audits, that specifies "Internal audits shall be performed annually or more often." This is a violation. (VIO 07000036/07-01-01)

The licensee issued PO-DO-001, Document Management Plan, which is required to be maintained per Chapter 2.2 of the license. The Project Management Plan contains, among other things, a description of the decommissioning organization, a description of responsibilities of project units, and a "description of the reporting hierarchy within the decommissioning project management organization, including a chart or diagram showing the relationship of each decommissioning project unit to other project units and decommissioning project management." Contrary to the above, PO-DO-001 did not contain a project management chart or diagram. This is a violation. (VIO 07000036/2007-01-01)

All three of the above violations were entered into the licensee's Corrective Action Program and activities initiated to address the issues by the end of the inspection.

c. Conclusion

The buildings were being adequately maintained, but concerns were identified regarding potential effects of water intrusion into the burial pits through animal holes and depressions in the soil covering the burial pit area. Three examples of one violation were identified concerning: a failure to use a correct work plan; a failure to conduct an annual audit; and a failure to meet a license requirement in that an organization chart was not provided in the Project Management Plan. These failures were the result of inadequate management attention to ensure licensed activities were conducted in accordance with license requirements. The licensee initiated corrective actions on each of these issues by the end of the inspection.

2.0 Effluent Control and Environmental Protection (88045)

a. Inspection Scope

The inspectors evaluated the licensee's performance to determine if the licensee was complying with the environmental monitoring commitments specified in Chapter 5, Environmental Protection, of its license. The inspectors also reviewed the licensee's action to address a recently discovered degradation of a sewer line.

b. Observations and Findings

Table 5-1, Environmental Monitoring Program, of Chapter 5 of the Westinghouse Hematite license (SNM-33) specifies the sampling requirements for the Operational Effluents Monitoring Program and the Operational Environmental Monitoring Program. The Operational Effluents Monitoring Program required continuous collection and weekly analysis of air effluents from the exhaust stacks and the conversion offgas stack, and continuous collection and weekly analysis of liquid effluent from the site dam and weekly collection and analysis from the sewage treatment outfall. The air effluent stacks had been demolished in December 2005, so no samples had been collected since that time.

The licensee modified Section 3.2.2 to address removal of the air effluent stacks, stating that, "At least one building exhaust will be maintained operational until the ventilation system is disassembled. Exhaust stacks shall be continuously sampled when in operation." However, the licensee had not taken steps to amend Chapter 5 of the license to remove the sampling requirement. Although the licensee indicated that the collection and analysis requirement specific to the operational air effluent monitoring of air effluents from the exhaust stacks and the conversion offgas stack would be deleted during the next revision of its license, the failure to meet the license requirement since December 2005 is a violation. (VIO 07000036/07-01-02)

Effluent samples from the site dam and sewage treatment outfall were being collected as required and the results of the radiological analysis of the samples collected during 2007 were below the control limits specified in the license. However, the licensee had recently been unable to consistently collect a sample at the sewer treatment outfall due to little or no effluent flow at the outfall. The licensee has an onsite sewer treatment system that discharges below the site pond on the southwest side of the site. After several occasions in which no flow was available to collect the weekly sewer outfall sample, the licensee opened a manhole about 50 feet downstream of the sewer treatment and verified there was flow from the system towards the outfall, but the effluent was not reaching the outfall. A camera was pushed through the pipe downstream from the manhole for 62 feet until it hit a "T" and could go no further. No problems in this stretch of pipe were observed, which was composed of four foot sections of tile pipe. The camera was inserted from the outfall end of the pipe for a distance of 108 feet until it hit what appeared to be roots and could go no further. It was indeterminate based on what was observed why the flow was not reaching the outfall, but a large section of pipe remained to be observed. The licensee's plan was to have the pipe cleaned, and then send the camera up the line again. The licensee provided the results of radiological analysis performed on samples collected from this outfall between 1986 and 2007. None of the results examined were in excess of the release limits specified in Chapter 5 of the license.

The results of the radiological analysis of samples collected during 2007 for the Operational Environmental Monitoring Program, which included air, surface water, ground water, soil, vegetation and sediment, were observed to be below the control limits specified in the license. However, no data was available for the plant onsite water well, which was abandoned in 2005 when the site connected to city water. This water sample collection issue was identified by the licensee in May 2007, entered into its corrective action process, and a root cause investigation performed. The preliminary results of the root cause analysis, which was in draft at the time of the inspection, indicated the causal factors were the lack of an adequate change control process, with a failure to follow procedures a contributing factor. Proposed corrective actions were to enhance the site change control process and train site personnel on the process. This is considered a second example of a failure to meet a license commitment due to changing site conditions and activities. (VIO 07000036/2007-01-02)

c. Conclusion

The licensee was complying with the environmental monitoring commitments specified in Chapter 5, Environmental Protection, of the license with two exceptions, which resulted in a violation for failing to implement license requirements. The two examples included a failure to collect and analyze samples from an on site water well, and a failure to collect

and analyze samples from the plant air discharge stacks. Both of these examples concerned the licensee's failure to amend the license as necessary to keep up with changing plant conditions. The licensee's actions taken to date to investigate a sewer line in which the discharge flow had significantly slowed for no known reason were adequate.

3.0 Radioactive Waste Management and Transportation Activities (88035, 86740)

a. Inspection Scope

The inspectors reviewed the adequacy of the shipping documents for twelve shipments of radioactive waste. The inspectors evaluated the storage area for 25 sea-land containers and intermodals containing contaminated metals for recycling to assess access control and security, placement of containers, and posting and labeling.

b. Observations and Findings

The licensee sent six shipments of radioactive waste to Oak Ridge, Tennessee, five on February 6, 2006, and one on May 22, 2006. Another six shipments of radioactive waste were sent to Clive, Utah, four on March 30, 2006, and two on April 2, 2006. A review of the Bill of Lading and Waste Manifest documents for the twelve shipments did not identify any deficiencies in the documents.

In the spring of 2007 the licensee received 25 sea-land containers containing recycle metals contaminated with uranium-235 from Mississagua Metals and Alloys (MMA) in Ontario, Canada, that had been previously shipped from Hematite to MMA for recycling. Due to a number of incidents at MMA, the 25 sea-land containers were returned to Westinghouse Hematite for temporary storage until MMA was ready to recycle the material. The containers were observed to be adequately controlled in a secured and protected area, with the containers stacked no more than two high. Although there was a rope barrier with a radiation area posting around the containers, the containers themselves had no radioactive materials labeling. The licensee indicated that when the containers were received they were labeled, but the labels had deteriorated in the weather and had been removed. Title 10 CFR 20.1904(a) states that "The licensee shall ensure that each container of licensed material bears a durable, clearly visible label bearing the radiation symbol and the words "CAUTION, RADIOACTIVE MATERIAL" or "DANGER, RADIOACTIVE MATERIAL." Although 10 CFR 20.1905(a) states that licensees do not have to label "Containers holding licensed material in quantities less than the quantities in appendix C to part 20," the inspector verified that at least six of the containers contained quantities of uranium-235 in excess of the appendix C limits. This is a violation. (VIO 07000036/07-01-03) Following the identification of this issue the licensee immediately labeled all the containers as required, and entered the failure to label the containers into its corrective action system for further assessment.

c. Conclusions

No deficiencies were identified in the shipping documents for twelve shipments of radioactive waste. One violation was identified for the failure to label sea-land containers and intermodals containing contaminated metals for recycling with required radioactive material labels.

4.0 Exit Meeting Summary

The NRC inspectors presented inspection findings to members of the facility management team following the onsite inspection on September 13, 2007. The licensee acknowledged the findings presented.

ATTACHMENT: SUPPLEMENTAL INFORMATION

SUPPLEMENTAL INFORMATION

PARTIAL LIST OF PERSONS CONTACTED

Westinghouse Electric Company, LLC

E. Kurt Hackmann, Director, Hematite Decommissioning Project
Matt Featherston, Manager, Engineering/Technical Support
Jason Valtos, Interim Radiation Safety Officer
Kevin Harris, Manager, Environmental Engineering
Russ Reynolds, Manager, Quality

State of Missouri

B. Moore, Missouri Department of Natural Resources

INSPECTION PROCEDURES USED

IP 86740 Transportation Activities
IP 88005 Management Organization and Controls
IP 88035 Radioactive Waste Management
IP 88045 Effluent Control and Environmental Protection

ITEMS OPENED, CLOSED, AND DISCUSSED

Opened	Type	Summary
VIO 07000036/2007-01-01	VIO	Failure to conduct burial pit sampling activities using Revision A of Work Plan EO-06-004, Work Plan for Buried Waste Investigation at the Hematite Site, a failure to perform an internal audit since 2005, a period greater than one year, and issuing PO-DO-001, Document Management Plan, without the required project management chart or diagram.
VIO 07000036/2007-01-02	VIO	Failure to collect and analyze samples of air effluent from the exhaust stacks and conversion offgas stack, and collect and analyze samples of plant well ground water.
VIO 07000036/2007-01-03	VIO	Failure to provide radioactive material labels on containers of recyclable metals contaminated with uranium-235.
Closed	None	
Discussed	None	

PARTIAL LIST OF DOCUMENTS REVIEWED

Westinghouse Electric Company, Chapters 1-8, of SNM-00033 Materials License

LIST OF ACRONYMS USED

ADAMS	Agencywide Documents Access and Management System
CFR	Code of Federal Regulations
DNMS	Division of Nuclear Material Safety
MMA	Mississagua Metals and Alloys
NRC	U.S. Nuclear Regulatory Commission
PDR	Public Document Room
VIO	Violation