NRC FORM 591FF PART 1
(12-2007)
10 CFR 2.201

U.S. NUCLEAR REGULATORY COMMISSION

INSPECTION REPORT

1. LICENSEE OR CERTIFICATE HOLDER/LOCATION INSPECTED:	2. NRC/REGIONAL OFFICE:
AREVA NP, Inc. 2101 Horn Rapids Road Richland, WA 99352-0130 REPORT NO: 2009-001	U.S. Nuclear Regulatory Commission Region II 61 Forsyth Street, Suite 23T85 Atlanta, GA 30303-8931

3. DOCKET NUMBER:	4. LICENSE OR CERTIFICATE NUMBER:	5. DATE(S) OF INSPECTION:
70-1257	SNM-1227	January 12, 2009 – January 15, 2009

LICENSEE OR CERTIFICATE HOLDER:

The inspection was an examination of the activities conducted under your license or certificate as they relate to safety and/or safeguards and to compliance with the Nuclear Regulatory Commission (NRC) rules and regulations and the conditions of your license or certificate. The inspection consisted of selective examinations of procedures and representative records, interviews with personnel, and observations by the inspector. The inspection findings are as follows:

☑ 1. Based on the inspection findings, a violation was identified, see attached Notice of Violation.

☐ 2. Previous violation(s) closed.

☐ 3. Reported events reviewed

☐ 4. The violation(s), specifically described to you by the inspector as non-cited violations, are not being cited because they were self-identified, non-repetitive, and corrective action was or is being taken, and the remaining criteria in the NRC Enforcement Policy, to exercise discretion, were satisfied.
Non-Cited Violation(s) was/were discussed involving the following requirement(s) and Corrective Action(s):

☐ 5. During this inspection, certain of your activities, as described below and/or attached, were in violation of NRC requirements and are being cited. This form is a NOTICE OF VIOLATION, which may be subject to posting in accordance with 10 CFR 19.11.
(Violations and Corrective Actions)

LICENSEE OR CERTIFICATE HOLDER STATEMENT OF CORRECTIVE ACTIONS FOR ITEM 5, ABOVE

I hereby state that, within 30 days, the actions described by me to the inspector will be taken to correct the violation(s) identified. This statement of corrective actions is made in accordance with the requirements of 10 CFR 2.201 (corrective steps already taken, corrective steps which will be taken, date when full compliance will be achieved). I understand that no further written response to the NRC will be required, unless specifically requested.

Title	Printed Name	Signature	Date
LICENSEE/CERTIFICATE HOLDER REPRESENTATIVE			
NRC INSPECTOR	M Thomas, O López, C Cramer	/RA;/	2/6/09

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6. INSPECTOR(S): Mary Thomas, Omar López, Chad Cramer

7. INSPECTION PROCEDURES USED: 88020 and 88054

EXECUTIVE SUMMARY

Summary of Plant Status

The AREVA NP Richland facility converts uranium hexafluoride into uranium dioxide for the fabrication of low-enriched fuel assemblies used in commercial nuclear power reactors. During the inspection period, normal production activities were ongoing. This routine, announced inspection included observations and evaluations in the area of plant operations and fire protection. The inspection involved observation of work activities, a review of selected records, and interviews with plant personnel.

Plant Operations (IP 88020)

- The inspectors observed routine operations in Vaporization, Dry Conversion, Powder Preparation, UF_6 Cylinder Washing, Blended Low Enriched Uranium (BLEU) Powder Receipt and Download, Powder Drum Warehouse, BLEU Powder Storage, Pellet Pressing, Pellet Sintering, Pellet Grinding, Rod Loading, Effluent Liquid Operations (ELO) Pellet Dissolver, Gadolinium Scrap Uranium Recovery, Hydrogen Fluoride (HF) Recovery, Continuous Mop Powder Dissolution, and the Ammonia Recovery Facility. No significant issues were identified.

- The inspectors reviewed management measures for items relied on for safety (IROFS) in: BLEU Receipt and Download, HF Recovery, Dry Conversion Vaporization, and Dry Conversion. The management measures reviewed were adequate.

- Through discussion with the operators, the inspectors determined that the operators were knowledgeable of plant procedures and the safety significant aspects of the licensee's process operations. Based on observations of plant operations and discussions with production operators, the inspectors determined that the licensee was adequately maintaining compliance with nuclear criticality safety (NCS) controls and nuclear material storage requirements.

- The inspectors reviewed corrective actions for failed IROFS and determined that the licensee was taking appropriate measures to repair and track failed IROFS to determine if any trends were visible.

Triennial Fire Protection (IP 88054)

- The inspection focused in the following areas: Warehouse 2, Warehouse 6, and Solid Waste Uranium Recovery area (SWUR).

- The inspectors reviewed the facilities fire hazard analysis to verify that the analysis considered effects of fires on safety controls, effects of suppression activities on process areas, malfunction of an automatic fire protection system, potential for spread of contamination, transient combustibles, offsite fire department and onsite fire brigade, and life safety considerations. No significant issues were identified.

- The inspectors verified that facility pre-fire plans for the selected areas were consistent with the fire hazard analysis and the as-built configuration. No significant issues were identified.

- The inspectors reviewed the licensee's control of combustibles/flammable materials and ignition sources programs. The inspectors noted that the combustible/flammable control program included requirements, IROFS 4502, for limiting the amount and proximity of combustible/flammable materials. The inspectors also noted that the ignition source program was consistent with the requirements of NFPA 51, Standard for the Design and Installation of Oxygen–Fuel Gas Systems for Welding, Cutting, and Allied Processes. In addition, the licensee had in place IROFS 4503, which was designed to provide an independent review to verify compliance with the programs. No significant issues were identified.

- The inspectors verified that fire ratings of fire barriers (e.g. walls, doors, and dampers) were appropriate for the credible fire hazards in the selected areas. The inspectors verified that a material of an appropriate fire rating was used to fill fire wall penetrations and that the installation met the fire wall design criteria. The inspectors also verified that the inspection, testing, and maintenance (ITM) of fire barriers designated as IROFS were in accordance with NFPA 80, Standard for Fire Doors and Other Opening Protectives and NFPA 101, Life Safety Code. No significant issues were identified.

- The inspectors reviewed the material condition, operational lineup, design, and ITM requirements of fire suppression and detection systems to verify that the systems were reliable and available. The inspectors identified a violation of NRC requirements related to the failure to perform a visual inspection of the sprinkler system, IROFS 4535.10, located in the SWUR-Incinerator area. The inspectors noted that Nuclear Criticality Safety Specification E04-NCSS-G06 required an annual functional test as a management measures for IROFS 4535.10. The annual functional test, C774P001 – "Fire Sprinkler 12 Months Outside Vendor," was executed by a contractor in accordance with Scheduling Agreement 5500000401. The Scheduling Agreement specified that the annual functional test be performed in accordance with the annual ITM requirements as specified in NFPA 25, Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems. The functional test included an annual visual inspection from the floor as specified in Section 5.2.1.1 of NFPA 25. The inspectors discussed the scope of the functional test with the contractor and determined that the sprinklers located in the SWUR-Incinerator area were not visually inspected as required. The failure to visually inspect the sprinklers located in the SWUR-Incinerator area was considered a violation of NRC requirements, VIO 70-1257/2009-01-01.

  In addition, the inspectors noted that the documented safety basis did not demonstrate that the existing management measures were adequate in some cases to ensure the reliability and availability of fire safety IROFS, in that the applicability of various fire safety code provisions was not specified. The licensee entered the issue in their corrective action program and stated that they will provide more information to the NRC. Inspector follow up item (IFI 70-1257/2009-01-02) was opened to track this issue.

- The inspectors verified that when the fire alarm was activated, the system dialed a Underwriters Laboratory (UL) approved fire alarm company which will automatically summon the fire department as required by the Integrated Safety Analysis. No significant issues were identified.

Exit Meeting Summary

The inspectors communicated observations and findings to licensee management and staff throughout the inspection and presented the final results to licensee management during an exit meeting held on January 15, 2009. The licensee management acknowledged the results of the inspection and understood the findings presented. No dissenting comments were received from the licensee.

List of Items Opened, Closed, Discussed

Item Number	Status	Description
VIO 70-1257/2009-01-01	Open	Failure to visually inspect the sprinklers located in the SWUR-Incinerator area.
IFI 70-1257/2009-01-02	Open	Licensee did not have a documented basis to demonstrate that existing management measures were adequate to ensure IROFS functionality.
Event Number 44682	Closed	The licensee retracted this event when it was determined that it did not rise to the level intended for concurrent NRC notification under 10 CFR 70, Appendix A.