



**UNITED STATES  
NUCLEAR REGULATORY COMMISSION**  
REGION II  
SAM NUNN ATLANTA FEDERAL CENTER  
61 FORSYTH STREET, SW, SUITE 23T85  
ATLANTA, GEORGIA 30303-8931

August 12, 2009

Mr. David L. Kudsin  
President  
Nuclear Fuel Services, Inc.  
P. O. Box 337, MS 123  
Erwin, TN 37650

SUBJECT: NRC INSPECTION REPORT NO. 70-143/2009-002 AND NOTICE OF VIOLATION

Dear Mr. Kudsin:

This letter refers to the inspections conducted from April 5, 2009 to June 30, 2009, at the Nuclear Fuel Services (NFS) facility in Erwin, TN. The purpose of these inspections was to determine whether activities authorized under the license were conducted safely and in accordance with NRC requirements. At the conclusion of these inspections on June 30, 2009, the findings were discussed with those members of your staff identified in the enclosed report.

The inspections 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 inspections are identified in the enclosed report. Within these areas, the inspections 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. This violation was evaluated in accordance with the NRC Enforcement Policy included on the NRC's Web site at <http://www.nrc.gov/about-nrc/regulatory/enforcement/enforce-pol.html>.

The violation is cited in the enclosed Notice of Violation (Notice), and the circumstances surrounding it is described in the subject inspection report. The violation is being cited in the Notice because it was more than minor and identified by the NRC.

You are required to respond to this letter and should follow the instructions specified in the enclosed Notice when preparing your response. The guidance from NRC Information Notice 96-28, "Suggested Guidance Relating to Development and Implementation of Corrective Action," is available on the NRC's Web Site and may be helpful. The NRC will use your response, in part, to determine whether further enforcement action is necessary to ensure compliance with regulatory requirements.

D. Kudsin

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In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter, it's 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/*

D. Charles. Payne, Chief  
Fuel Facility Inspection Branch 1  
Division of Fuel Facility Inspection

Docket No. 70-143  
License No. SNM-124

Enclosures: 1. Notice of Violation  
2. NRC Inspection Report No. 70-143/2009-002

cc w/encls:  
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Vice President, Operations  
Nuclear Fuel Services, Inc.  
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Lawrence E. Nanney  
Director  
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Electronic Mail Distribution

cc w/encls: (Cont'd on page 3)

D. Kudsin

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(cc w/encls: cont'd)  
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211 N. Main Avenue  
P.O. Box 59  
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Gregg Lynch  
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Erwin, TN 37650

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ADAMS:  Yes    ACCESSION NUMBER: \_\_\_\_\_

SUNSI REVIEW COMPLETE

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DATE	8/ /2009	8/ /2009	8/ /2009	8/ /2009	8/ /2009	8/ /2009
E-MAIL COPY?	YES    NO	YES    NO	YES    NO	YES    NO	YES    XNO	YES    NO

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## NOTICE OF VIOLATION

Nuclear Fuel Services, Inc.  
Erwin, Tennessee

Docket No. 70-143  
License No. SNM-124

During NRC inspections conducted from April 5, 2009 thru June 30, 2009, a violation of NRC requirements was identified. In accordance with the NRC Enforcement Policy, the violation is listed below:

Safety Condition S-1 of Special Nuclear Materials (SNM) License No. SNM-124 authorizes the use of licensed materials in accordance with the statements, representations, and conditions in the License Application and Supplements.

Section 2.7 of the License Application, "Procedures," states in part that SNM operations and safety function activities shall be conducted in accordance with approved written procedures. Compliance with these procedures is mandatory.

Contrary to the above, the following two examples of failing to conduct activities in accordance with approved written procedures were identified:

1. Standard Operating Procedure (SOP) 401, Section 8, "Area 800," Revision 6, governs the operation of exhaust blowers B801 and B802.

On April 27, 2009, while performing preventative maintenance, plant personnel secured blowers B801 and B802 while the combustible gas was still in use utilizing a preventative maintenance document rather than the approved SOP.

2. NFS-GH-36, "Lockout/Tagout," Revision 7, Step 5.5 requires the installation of locks/tags on all identified energy isolation points when working on equipment.

On April 27, 2009, plant personnel failed to affix locks or tags on the disconnect breakers (the energy isolation points) of blowers B801 and B802 while performing preventative maintenance.

This is a Severity Level IV Problem (Supplement VI).

Pursuant to the provisions of 10 CFR 2.201, Nuclear Fuel Services, Inc. (NFS), is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555-0001, with a copy to the Regional Administrator, Region II, and a copy to the NRC Resident Inspector at the NFS, 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; EA-08-346" and should include for each violation: (1) the reason for the 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 this issue involves security-related information your response will not 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>. If Classified Information is necessary to provide an acceptable response, please provide the level of protection described in 10 CFR Part 95." Otherwise, mark your entire response "Security-Related Information - Withhold Under 10 CFR 2.390."

In accordance with 10 CFR 19.11, you may be required to post this Notice within two working days.

Dated this 12th day of August, 2009

U. S. NUCLEAR REGULATORY COMMISSION

REGION II

Docket No.: 70-143

License No.: SNM-124

Report No.: 70-143/2009-002

Licensee: Nuclear Fuel Services, Inc.

Facility: Erwin Facility

Location: Erwin, TN 37650

Dates: April 5, 2009 – June 30, 2009

Inspectors: S. Burris, Senior Resident Inspector  
G. Smith, Resident Inspector  
J. Foster, Fuel Facility Inspector

Approved by: D. Charles Payne, Chief  
Fuel Facility Inspection Branch 1  
Division of Fuel Facility Inspection

## **EXECUTIVE SUMMARY**

Nuclear Fuel Services, Inc.  
NRC Inspection Report 70-143/2009-002

This inspection included activities conducted by the resident and regional inspectors during normal and off normal shifts in the areas of safety operations, radiological controls, facility support, and safeguards.

### **Safety Operations**

- Plant operations activities were generally performed safely and in accordance with approved procedures. A violation was noted regarding the proper operation of items relied on for safety. (Paragraph 2.a)
- Licensee personnel adequately implemented nuclear criticality safety controls. (Paragraph 2.b).
- The licensee adequately maintained fire barriers and controlled transient combustibles. (Paragraph 2.c)

### **Radiological Controls**

- The licensee adequately implemented the radiation protection program consistent with the license and regulations. (Paragraph 3)

### **Facility Support**

- The licensee adequately performed maintenance and surveillances in accordance with plant procedures. (Paragraph 4.a)
- The licensee sufficiently documented and corrected adverse conditions. (Paragraph 4.b)

The licensee adequately implemented the training program and activities.  
(Paragraph 4.c)

### **Safeguards**

- Physical protection elements were carried out in accordance with the security plan. (Paragraph 5b)

### **Attachment**

Partial List of Persons Contacted

Inspection Procedures Used

List of Items Opened, Closed, and Discussed

## REPORT DETAILS

### 1. Summary of Plant Status

Fuel manufacturing facility (FMF), training activities, and scrap recovery processes were operated throughout the reporting period. Blended low enriched uranium (BLEU) oxide conversion activities operated at reduced capacity during the inspection period. BLEU Preparation Facility (BPF) operations were conducted in accordance with license requirements. Decommissioning, including processing, packaging, and shipping contaminated soil and debris from burial grounds continue under normal operations.

The resident staff supported the regional Commercial Development Line (CDL) operational readiness review (ORR) initiative which began on June 1, 2009. Several technical issues were reviewed, evaluated and resolved during the assessment.

### 2. Safety Operations

#### a. Plant Operations (Inspection Procedure (IP) 88135)

#### (1) Inspection Scope and Observations

##### Operating Area Observations

The inspectors performed daily tours of the plant operating areas and determined that equipment and systems were operated safely and in compliance with the license. Daily operational meetings, which discussed production status and issues, were observed throughout the period. The inspectors reviewed selected licensee-identified events and corrective actions for previously identified events, and found no significant deficiencies in the items reviewed. The inspectors focused on plant operations, safety-related equipment (valves, sensors, instrumentation, in-line monitors, scales, etc.) and items relied on for safety (IROFS).

These daily tours included walkdowns of the BPF, FMF, storage areas, vaults, and the waste water treatment facility. The inspectors verified staffing was adequate and operators were attentive to their duties (including acknowledging the status of various alarms and annunciators). The inspectors also verified normal and abnormal activities were performed in compliance with procedures and station limits, and that safety controls were in place and with adequate supervisory oversight. The inspectors verified the adequacy of communications between supervisors and operators within the operating areas. The inspectors walked down sections of the standard operating procedures and verified that IROFS were identified and operable in each of the areas. The inspectors reviewed log books, lockout/tagout records, and Letters of Authorization (i.e. temporary modifications) to obtain information concerning operating trends and activities. The inspectors verified the licensee was actively pursuing permanent corrective actions for conditions requiring temporary modifications as well as any prescribed compensatory measures.

On April 27, 2009, while conducting a daily tour in processing area 800, the inspectors noted an audible alarm indicating a loss of exhaust ventilation for the area. The operator quickly responded to the alarm panel and noted that exhaust fan B801 was not running

and attempted to restart the blower; however the fan would not restart. The operator then began to implement Standard Operating Procedure (SOP) 401, Sec 8, "Area 800." Step 8.19 of this procedure addresses a low differential pressure across fan B801 which indicates a fan failure. This exhaust fan is used to safely remove combustible gases from the process in area 800. The operator then attempted another restart of the fan but again the fan would not run. Concurrently, the operator also noted a loss of the room exhaust fan B802 as indicated by an alarm. Both fans are considered IROFS. After the loss of both fans, the operator secured combustible gas to the system as required by Step 8.19.2 and notified supervision. Following an initial investigation by supervision, it was discovered that maintenance personnel were on the building roof performing preventative maintenance on fans B801 and B802. After completion of maintenance, the fans were restarted and the licensee began an investigation of the event.

Problem Identification Resolution and Correction System (PIRCS) item #18418 for this event implemented a small team root cause investigation. During this investigation, the licensee noted that in addition to violating SOP 401 by securing the fans (credited as IROFS for an analyzed accident sequence) during system operation, the maintenance personnel performing the work failed to utilize locks/tags while working on the fans contrary to procedure NFS-GH-36, "Lockout/Tagout," Revision 7.

The inspectors evaluated the significance of the loss of ventilation during operations. Exhaust blowers B801 and B802 are identified in the Integrated Safety Assessment (ISA) as IROFS. The associated high consequence accident sequences involve the prevention of a buildup of combustible gases in Area 800. Given the failure of the IROFS, the resulting risk index indicated the performance criteria of 10CFR70.61 were still being met. The risk was minimized due to the existence of combustible gas detectors as well as the operator's prompt isolation of the combustible gas to the system. However, the associated risk to operation was increased and the improper securing of the fans was considered a more than minor violation. Improperly securing exhaust ventilation fans contrary to procedure as well as the failure to follow lockout/tagout procedures constitutes a violation (VIO) of NRC requirements (VIO 70-143/2009-002-01).

### Plant Tours

The inspectors performed periodic tours of the outlying facility areas during the inspection period and determined that equipment and systems were operated safely and in compliance with the license. The focus of these tours centered around the evaluation of potential missile hazards and missile protection features, combustible material storage and fire loading, hazardous chemical storage, adequate storage of compressed gas containers, potential degradation of plant security features, and potential fire hazards. During these tours the inspectors also verified that required notices to workers were appropriately and conspicuously posted in accordance with 10CFR19.11. No issues were noted.

### Plan-of-the-Day-Meeting

The inspectors attended various plan-of-the-day meetings throughout the inspection period in order to determine the overall status of the plant. The inspectors evaluated the adequacy of the licensee's response to significant plant issues as well as the licensee approach to solving various plant problems. No issues were noted.

### Safety-Significant System Walkdown

During the inspection period, the inspectors performed a walkdown of the safety significant systems involved with the processing of licensed nuclear material listed below. As part of this system evaluation, the inspectors reviewed the ISA for the system in order to identify assumptions and controls. The inspectors verified that these assumptions and controls were properly implemented in the field. During the walkdown, the inspectors verified that the as-built configuration matched the approved plant drawings. The inspectors also interviewed operators in order to ensure that plant personnel were familiar with the assumptions and controls associated with these systems as well as the IROFS and IROFS instrumentation for maintaining plant safety. In addition, the inspectors verified valve and switch alignments required by procedure, reviewed conditions that may degrade plant performance (or the operability of IROFS), inspected safety-related devices, and audited support systems essential to safety system performance for the following systems:

- Area 800 ventilation system
- Building 304 Area LA
- 302 Area F
- Building 303 Area 600 and 700
- Commercial Development Line

#### (2) Conclusions

The licensee operated the facility safely and in accordance with the license requirements and the ISA. A violation was noted regarding the proper operation of items relied on for safety.

#### b. Criticality Safety (IP 88135)

##### (1) Inspection Scope and Observations

During daily operating area tours, the inspectors verified various criticality controls to be in place. The station limit card requirements were adhered to by personnel. Containers were adequately controlled in order to minimize criticality hazards. The inspectors sampled a number of criticality-related IROFS to verify their operability. Operators were knowledgeable of the IROFS requirements. These IROFS were adequately identified in the field as well as on plant controlled drawings.

#### (2) Conclusions

Licensee personnel adequately implemented nuclear criticality safety controls.

#### c. Fire Protection (IP 88135)

##### (1) Inspection Scope and Observations

During the inspection period, the inspectors conducted a fire safety tour of Building 303. The inspectors verified adequate control of combustible material. The inspectors walked down various fire suppression components and systems that supplied Building 303 and

verified these systems were properly aligned and operational. The inspectors verified that various aspects of the fire protection/prevention strategies conformed to the applicable nuclear criticality safety evaluation.

(2) Conclusions

The licensee adequately maintained fire barriers and controlled transient combustibles.

**3. Radiological Controls**

Radiation Protection (IP 88135 and 88030)

(1) Inspection Scope and Observations

During various tours of the operating areas, the inspectors verified workers complied with health physics procedures. The inspectors noted that plant workers properly wore dosimetry, used protective clothing in accordance with applicable Radiological Work Permits (RWPs), and properly frisked upon exiting the controlled area. The inspectors verified radiation areas were properly posted and that radiation maps included up-to-date radiation levels. The inspectors also verified the operation of radiation protection instruments and their calibration frequencies.

The inspectors performed a detailed review of Safety Work Permit (SWP) #13144, which involved decontamination activities associated with a spill in glove box 3C08 in Building 333. This SWP included radiological control requirements detailed under the RWP section. The inspectors verified that operations personnel complied with the prescribed controls and precautions. The inspectors noted that the RWP contained adequate requirements concerning the radiation levels, respiratory equipment, dosimetry, contamination levels, special tools and equipment, airborne radioactivity, and containment devices. The area was effectively controlled by health physics personnel. The SWP was prominently posted for employees' review and observation. Workers entering the SWP area signed the SWP, verifying their knowledge of the entry requirements.

The inspectors observed the collection and analysis of stationary air sample filters from the BPF Low Enriched Uranium (LEU) area and verified that the activities were conducted in accordance with approved procedures. The inspectors reviewed monthly airborne concentration trends over the past two years for the facility and noted that the airborne concentration was stable. The inspectors reviewed sealed source leak test records and the corresponding operating procedure. No issues were identified.

The inspectors observed the external dose survey of the raffinate storage pad and smear surveys at the laundry facilities and solvent extraction area of the BPF facility. The inspectors observed the analysis of smear samples on both the Tennelec detector and a portable survey instrument. The collection and measurement of the surveys were in accordance with approved procedures. The inspectors reviewed a week's worth of past survey records which included the 302, 303, and 333 areas and the corresponding step-off pad surveys. The inspectors reviewed the average surface contamination trend graph for each of the process areas. The survey results were below the action levels at which increased survey frequencies are required by the license.

The inspectors toured the 302, 303, 306, and 333 facilities and obtained independent external dose measurements. The radiological postings observed in the facilities and at the temporary work sites were in accordance with NRC requirements. The inspectors verified that both entrances to the restricted area had the correct radiological material posting as specified by the license. The NRC "Notice to Workers" was properly located in two high traffic areas of the plant.

The inspectors verified the correct operation of instruments by the radiation technicians which included operability and background checks. Current calibration stickers were present on all instruments observed throughout the facility. The inspectors observed the calibration of a Thermo Eberline alpha portable survey detector. No issues were noted.

The inspectors reviewed several procedures revised since the last inspection. The revisions were consistent with the license and regulations. The inspectors observed the generation of a special SWP and reviewed the revised SWP procedure. No issues were noted. The inspectors reviewed the health physics As Low As Reasonably Achievable (ALARA) report for the 1<sup>st</sup> quarter of 2009, interviewed management, and reviewed corrective action program items entered since the last inspection. The inspectors determined that all reviewed health physics events were properly reported since the last inspection.

(2) Conclusions

Radiation protection practices were performed in accordance with plant procedures and ensured that dose was maintained ALARA. No significant issues were identified.

**4. Facility Support**

a. Maintenance/Surveillance (IP 88135)

(1) Inspection Scope and Observations

The inspectors observed surveillance testing of hydrogen detectors in the BPF uranium-aluminum area, implementation of lockout/tagout in the BPF uranium-metal area, and implementation of radiation work permit requirements for various corrective maintenance activities. The inspectors observed that those activities were conducted in accordance with regulatory requirements. The inspectors noted a weakness while observing the surveillance in that three-way communications were not used when verifying by radio that an operator in an adjacent area had properly aligned valves and switches in support of a test. The licensee stated its intent to assess the need to implement three-way communications while conducting safety-related activities.

The inspectors reviewed a recent minor change to an IROFS surveillance procedure for hydrogen detectors in the uranium-aluminum area and noted that the change was approved in accordance with license requirements. The inspectors attended a problem report screening committee meeting and observed that the licensee had appropriately classified issues and had taken adequate short-term corrective actions. The inspectors also reviewed a sampling of biennial audits performed on various management measures, as required by the license application, and noted that audit findings were placed into the licensee's corrective action program and adequately addressed. No violations of regulatory requirements were noted.

(2) Conclusions

The licensee adequately performed maintenance and surveillances in accordance with plant procedures.

b. Management Organization and Controls (IP 88135)(1) Inspection Scope and Observations

The inspectors performed daily reviews of the licensee's PIRCS entries to ensure that items adverse to requirements and quality were being identified and tracked to closure. The inspectors verified that issues were being properly identified, reviewed and tracked to completion.

(2) Conclusions

The licensee sufficiently documented and corrected adverse conditions.

c. Training (88010 and 88135)(1) Inspection Scope and Observations

The inspectors observed operator training for the recently installed Commercial Development Line (CDL). This included "hands-on" activities in the field and classroom training. Routine operations and abnormal/emergency actions were discussed with individual operators. The inspectors discussed both theory and practical actions associated with operating the facility.

Various training procedures, course outlines, and course examinations were reviewed. The computerized Training and Qualification system was used by the inspectors to review several randomly selected personnel records. These records were found to be up-to-date. The inspectors discussed with the operators their understanding of posted criticality limits and the significance of not complying with these requirements. The operators were familiar with the requirements.

CDL training adequacy was reviewed by the NRC Operational Readiness Review Team and was documented in NRC Report 70-143/2009-009.

(2) Conclusions

The licensee adequately implemented the training program and activities.

**5. Safeguards**Physical Protection (IP 88135)(1) Inspection Scope and Observations

During daily plant tours, the inspectors verified that persons within the protected area (PA) properly displayed photo identification and those individuals not possessing unescorted access clearance were properly escorted. During entry and exit from the

PA, the inspectors verified that personnel were searched using appropriate search equipment. Additionally, during tours of the operating areas, the inspectors verified that the Material Access Area (MAA) portals were effectively controlled. During tours of the PA perimeter, the inspectors verified the general integrity of PA barriers, maintenance of isolation zones around PA barriers, and adequate PA illumination levels.

(2) Conclusions

Physical protection elements were carried out in accordance with the security plan.

**6. Follow-up on Previously Identified Issues**

(Closed) URI 70-143/2008-002-002: Review method for making changes to active safety work permits

The inspectors reviewed the August 2008 Health Physics Audit of the Safety Work Permit Program. The audit reviewed each of the changes made to a SWP and revealed that only a small number of the changes were significant. The inspectors reviewed the revised SWP procedure and observed that the procedure included the definition of a significant change. A significant change to an SWP constituted an upgrade to stricter PPE requirements, implementation of companion permits (such as confined space permits), or an unexpected change in radiological conditions. A significant change will terminate the SWP and a new SWP will be created by authorized personnel. The program review and procedural changes were adequate to close the unresolved item. No violations were identified in the review.

(Closed) VIO 70-143/2008-004-002: Failure to follow posted safety work permit requirements

The inspectors discussed the violation and subsequent corrective actions with the licensee management. The inspectors reviewed the revisions to the procedure and Radiation Technician Job Coverage Responsibility lesson plan as referenced by the Reply to Notice of Violation sent on March 5, 2009. The revision determined that the work site is not "active" under a SWP until the SWP is officially posted. Once the SWP is posted, all requirements of the permit are in force. The inspectors interviewed plant personnel and determined that they understood the change in the procedures. The corrective actions were adequate to close the violation.

**7. Exit Meeting**

The inspection scope and results were presented to members of the licensee's staff at various meetings throughout the inspection period and were summarized on June 30, 2009, with licensee management. No dissenting comments were received from the licensee. Proprietary information was discussed but not included in the report.

**ATTACHMENT****1. PERSONS CONTACTED****Partial List of Licensee's Persons Contacted**

G. Athon, Jr., Director, Applied Technology and Principal Scientist  
 N. Brown, Nuclear Safety Engineer  
 D. Coulter, Health Physicist  
 R. Dailey, Engineering Director  
 M. Dotson, Maintenance Manager  
 R. Droke, Licensing and Compliance Director  
 D. Kudsin, President, NFS  
 T. Lindstrom, Vice President, Operations  
 B. Long, Project Engineering Section Manager  
 M. Moore, Director, Safety and Regulatory  
 J. Nagy, Chief Nuclear Safety Officer  
 J. Quillen, Process Engineering Director  
 R. Shackelford, Nuclear Criticality Safety Manager  
 T. Sheehan, Director, High Enriched Uranium (HEU) Operations  
 M. Shope, Quality Assurance Manager  
 A. Vaughn, Director, Fuel Production  
 J. Wheeler, Licensing and ISA Manager  
 D. Wise, Director, Fuel and Operations

**2. INSPECTION PROCEDURES USED**

IP 88135 Resident Inspectors Program for Category 1 Fuel Cycle Facilities  
 IP 88010 Operator Training/Retraining  
 IP 88030 Radiation Protection

**3. LIST OF ITEMS OPENED, CLOSED, AND DISCUSSED**

<u>Item Number</u>	<u>Status</u>	<u>Type/Description</u>
70-143/2009-002-01	Open	VIO – Improper Securing of IROFS During System Operation (Paragraph 2)
70-143/2008-002-02	Closed	URI - Review Method for Making Changes to Active Safety Work Permits (Paragraph 6)
70-143/2008-004-02	Closed	VIO - Failure to Follow Posted Safety Work Permit Requirements (Paragraph 6)