ENERGYSOLUTIONS

March 22, 2010

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555

Ref: 1) USNRC Inspection Report 71-0935/2009-201
2) Energy*Solutions* Response to Reference 1, dated November 13, 2009

Subject: Supplement to Energy*Solutions* Response dated November 13, 2009

On November 13, 2009 Energy*Solutions* provided a response to the Referenced USNRC Inspection Report. This letter supplements our original response and provides additional information related to the inspection findings.

Should you or members of your staff have questions concerning the content of this reply, please contact me at (803) 758-1826.

Sincerely,

Richard E. Campbell

Richard E. Campbell
Energy*Solutions*
Corporate Director, Quality Assurance

Attachment

cc: Mr. David W. Pstrak, Chief, Rules, Inspections, and Operations Branch
Mr. James J. Pearson, Safety Inspection Engineer, Nuclear Material Safety & Safeguards

140 Stoneridge Drive
Columbia, SC 29210

NMSS01

Additional Information Related to Energy*Solutions* Response to USNRC Inspection Report:

1 When was VTI removed from the ASL?

Vacuum Technologies Inc. (VTI) was removed from the Energy*Solutions* Approved Supplier List (ASL) on June 6, 2009.

2 When did the CGI for the leak standards go into effect?

The Commercial Grade Item Dedication plan was initially approved on June 19, 2009, subsequently revised on October 29, 2009 with the first leak standard dedicated on October 30, 2009.

3 What evaluation/actions were performed to assure that the inspections performed using the standards from VTI, while they were on the ASL and were not dedicated, were acceptable?

The CGI dedication form for the calibration of halogen leak standards includes one critical characteristic (Supplier Controls) that has been divided into seven acceptance criteria. These seven acceptance criteria for dedicating halogen leak standards are:

1. Calibration standards are identified, controlled and traceable to NIST or other nationally recognized standard.
2. The calibration is performed to procedures or equipment manufacturer manuals.
3. The calibration is performed by qualified personnel.
4. Out of tolerance notification is available for both leak standards calibrated and the standards used.
5. Calibration standard accuracy is greater than or equal to the item being calibrated.
6. Notification of any repairs made and the parts used in the repair.
7. As found data and as left data are recorded.

Acceptance criteria 1 through 6 were verified via commercial grade survey. These same criteria were verified as during previous Energy*Solutions* audits of VTI. Acceptance criterion number 7 is verified via inspection of the calibration record to evaluate as-found and as-left data. This has historically been performed as part of the receipt inspection process each time any instrument is returned from a calibration check. Based on this, the use of the leak standards calibrated by VTI prior to implementation of the CGI dedication process was evaluated to be acceptable and there is no adverse impact on past use of these leak standards.

4 Additional detail on what actions were taken to assure that the existing UX-30's are acceptable.

An assessment of Columbiana Hi Tech (Hi Tech) was performed. The assessment was performed in two parts. The first part was the review and acceptance of the NIAC audit, number 3106, performed by Westinghouse Electric Company. The NIAC audit was used to verify the overall implementation of the Hi Tech QA Program. The NIAC audit resulted in no findings and has been accepted by Energy*Solutions*.

The second part consisted of an onsite assessment performed at the Hi Tech facility in Greensboro, NC on May 27 and 28, 2009. This portion of the assessment reviewed the fabrication records for over-packs previously fabricated, inspected and accepted by Hi Tech. The assessment verified:

- procurement documents were reviewed to verify that they included the quality requirements;
- the control of special processes to assure welders and non-destructive examination technicians were qualified and using approved procedures;
- the control of the fabrication process through the use of shop travelers;
- inspection of the over-packs during and after fabrication; and
- control of measuring and test equipment used during the inspection of the over-packs.

Additionally, the historical performance record of these existing UX-30 overpacks indicates that the units have performed in service as designed. Other than the 10 CFR 71.95 Reports regarding customer-related maintenance on the ball-lock pins there have been no known issues raised with the operational performance of these packages. Energy*Solutions* concludes that the UX-30 overpacks fabricated prior to this USNRC Inspection were adequate to place in service.

5 Response to the question; Are the QA/QC actions/requirements we implemented the same actions we would have implemented if we procured the UX-30s directly?

The process Energy*Solutions* currently has in place to verify the fabrication, inspection and acceptance of the over-packs fabricated by Hi Tech for direct sale to their customers is identical to the process Energy*Solutions* would use to direct procure the over-packs. This process includes Hi Tech maintaining an USNRC approved QA Program, maintaining Hi Tech on our Approved Supplier List, performing in-process inspections, and performing surveillances at the end of fabrication process, including review of fabrication records.