

OCT 01 2010

LES-10-00211-NRC

ATTN: Document Control Desk
Office of Nuclear Material Safety and Safeguards
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Louisiana Energy Services, LLC
NRC Docket Number: 70-3103

Subject: Reply to Notice of Violation 70-3103/2010-001 – Part 2 Supplement

Reference: 1. Letter from LES to NRC, LES-10-00169-NRC, Extension Request for Part 2 Reply to Notice of Violation 70-3103/2010-001, dated July 28, 2010.
2. Letter from LES to NRC, LES-10-00194-NRC, Reply to Notice of Violation 70-3103/2010-001-Part 2, dated August 26, 2010.

In the URENCO USA (UUSA) letter requesting an extension for the Part 2 Reply to Notice of Violation (NOV) 70-3103/2010-001 (Ref. 1) interim actions were committed to for minimizing recurrence of the Violation condition until an evaluation to assess the need for enhancement of the corrective actions was completed. Subsequently, a common cause evaluation related to the subject NOV has been completed. UUSA has determined that the commitments stated in Ref.1 are no longer warranted since the actions provided in Ref. 2 and stated in this supplement are sufficient.

In addition, in Ref. 2 UUSA identified that based on the common cause evaluation results if warranted, UUSA may supplement the NOV response. Supplemental corrective actions have been identified and are described in the enclosure to this letter. Also, corrective actions for training have been changed to performance of a training needs analysis from which training needs, if any, will be identified and subsequently scheduled for completion.

Should there be any questions concerning this submittal, please contact Gary Sanford, LES Director of Quality and Regulatory Affairs, at 575.394.5407.

Sincerely,



Allen Sorrell for
David E. Sexton
Chief Nuclear Officer and Vice President of Operations

Enclosure: Supplemental corrective actions for Reply to Notice of Violation 70-3103/2010-001– Part 2

JED07

Anthony D. Masters
(Acting)Chief, Construction Projects Branch 1
US NRC, Region II
245 Peachtree Center Ave, NE
Suite 1200
Atlanta, GA 30303-1257

Anthony T. Gody
Deputy Director, Construction Projects
US NRC, Region II
245 Peachtree Center Ave, NE
Suite 1200
Atlanta, GA 30303-1257

Tyrone D. Naquin, Project Manager
Two White Flint
Mail Stop EBB2-C40M
11545 Rockville Pike
Rockville, MD 20852-2738

John Parker, Chief
Radiation Control Bureau
Field Operations Division
Environment Department
Harold S. Runnels Building
1190 St. Francis Drive, Room S 2100
P.O. Box 26110
Santa Fe, NM 87502

Sarah Cottrell, Deputy Secretary
New Mexico Department of Environment
Office of the Secretary
1190 St. Francis Drive
P. O. Box 26110
Santa Fe, NM 87502-0157

Patricia A. Silva
Chief, Technical Support Branch
Division of Fuel Cycle Safety and Safeguards
Office of Nuclear Materials and Safeguards
6003 Executive Blvd.
Rockville, MD 20852

Luis A. Reyes
Regional Administrator
Region II
245 Peachtree Center Ave, NE
Suite 1200
Atlanta, GA 30303-1257

Jay L. Henson
Chief, Fuel Facility Branch 2
USNRC, Region II
245 Peachtree Center Ave, NE
Suite 1200
Atlanta, GA 30303-1257

Matt White, Mayor
City of Eunice
P.O. Box 147
Eunice, NM 88231

Gary Don Reagan, Mayor
City of Hobbs
200 E. Broadway
Hobbs, NM 88240

Cheryl Chance, Mayor of Jal
P.O. Box Drawer 340
Jal, NM 88252

Greg Fulfer, Chairman
Lea County Commissioners
100 North Main
Lovington, NM 88260

Richard A. Ratliff, PE, LMP
Radiation Program Officer
Bureau of Radiation Control
Department of State Health Services
Division for Regulatory Services
1100 West 49th Street
Austin, TX 78756-3189

Carlos Romero, Chief
Radiation Control Bureau
Field Operations division
Environment Department
Harold S. Runnels Building
1190 St. Francis Drive, Room S 2100
P.O. Box 26110
Santa Fe, NM 87502

ENCLOSURE

Louisiana Energy Services/URENCO USA (LES/UUSA)

Supplemental corrective actions for Reply to Notice of Violation 70-3103/2010-001– Part 2

Corrective actions noted below are applicable to Violations D and E of Notice of Violation 70-3103/2010-001

1. Revised Procedure EG-3-6000-01, Construction Work Plans to:
(Completed 9/9/10)
 - a. Clearly define the purpose of the work plan for QL-1, 1G, & 2 packages. The purpose of the procedure for QL-3 work shall also be defined. The three required purposes of work plans are:
 1. To provide a means to capture quality records that provide objective evidence that work activities at the site have been performed in a quality manner in accordance with design documents. This only applies to QL-1, QL-1G, & QL-2 work plans.
 2. To provide a means to authorize work activities in the operational plant. This applies to all work plan quality levels (QL-1, QL-1G, QL-2, and QL-3).
 3. To define the scope of work and establish a logical sequence of work (QL-1, QL-1G, QL-2, and QL-3).
 - b. Define the method for partial signoffs in work plan instructions. Partial signoffs shall not be permitted except where specifically allowed by the work plan step itself. (Completed 9/9/10)
 - c. Define when work steps are to be signed as completed, the method for late entry of signatures, and the responsibility of each work plan reviewer/approver. (Completed 9/10/10)
 - d. Require that construction supervisor be a required reviewer/approver of work plans. The construction supervisor is responsible to review the work plan instructions to ensure that the steps are logical and constructible. (Completed 9/9/10)
 - e. Require an independent technical review of QL-1, QL-1G, and QL-2 work plans. (Completed 9/9/10)

2. Revised SA-3-2000-21 "Pre-Job Brief/Job Hazard Analysis (PJB/JHA)" procedure to address the following:
(Due Date: 10/31/10)
 - a. The PJB must be delivered by the foreman or supervisor directly responsible for performing the work. For all work that is performed under the scope of Urenco work plans this shall be an individual qualified to the Urenco Construction Work Plan Process.

- b. In Attachment 1 "Pre-Job Briefing Instructions" add the requirement that the applicable work plan be listed on form SA-3-2000-21-F2 under *Description of Work*.
 - c. In Attachment 1 "Pre-Job Briefing Instructions" add the requirement that the applicable work plan steps be listed in the *List of Steps in Task*.
3. Coordinate with the Training Group to perform a training needs analysis of the construction work plan process per TQ-3-0100-01 "TSD Process Activities." Needs analysis should consider the role of Construction Building Managers, Construction Supervisors, Construction Craft, Construction Work Planners, Construction Engineers, Design and Support Engineers, Quality Control Inspectors, Operations personnel, and Maintenance personnel.

Based on the results of the needs analysis additional actions to revise procedures and/or conduct training may be required. Due Date: 10/31/10