



**Robert Van Namen**  
*Senior Vice President*

September 28, 2010  
GDP 10-0036

301-564-3312 *phone*  
301-564-3207 *fax*

Mr. Victor M. McCree  
Deputy Regional Administrator for Operations  
Office of the Regional Administrator, Region II  
U. S. Nuclear Regulatory Commission  
Marquis One Tower  
245 Peachtree Center Avenue, Suite 1200  
Atlanta, Georgia 30303-1257

**Paducah Gaseous Diffusion Plant (PGDP)**  
**Docket Number 70-7001, Certificate No. GDP-1**  
**Summary of Actions Taken in Response to NRC Order EA-08-280**

Dear Mr. McCree:

The Nuclear Regulatory Commission's (NRC) letter of August 18, 2009 (See Reference), issued Confirmatory Order EA-08-280 to the United States Enrichment Corporation (USEC). The Confirmatory Order was a result of a successful alternative dispute resolution (ADR) session. Section V of the Confirmatory Order requires USEC to provide the NRC with a letter discussing its basis for concluding that the Confirmatory Order has been satisfied. Enclosure 1 of this letter provides the required basis and a summary of actions taken.

If you have any questions regarding this review, please contact Steve Toelle (301) 564-3250. There are no new commitments contained in this submittal.

Sincerely,

Robert Van Namen

Reference: Letter from Victor M. McCree (NRC) to Robert Van Namen (USEC),  
Confirmatory Order (EA-08-280), dated August 18, 2009.

Enclosure: Summary of Actions Taken in Response to NRC Order EA-08-280.

cc: J. Henson, NRC Region II Office  
T. Liu, NRC Project Manager – HQ  
M. Miller, NRC Sr. Resident Inspector - PGDP

## **Summary of Actions Taken in Response to NRC Order EA-08-280**

### **I. INTRODUCTION**

The Nuclear Regulatory Commission's letter of August 18, 2009, issued Confirmatory Order EA-08-280 to USEC. Section V of the Order requires USEC to meet four requirements as corrective actions resulting from a successful alternative dispute resolution (ADR) regarding an incident that occurred on August 10, 2007, when a Training Records Clerk and a Security Analyst shipped a package containing classified information to an address that was not an approved Classified Mailing Address. Section V of the Confirmatory Order requires USEC to provide the NRC with a letter discussing its basis for concluding that the Confirmatory Order has been satisfied. The four actions are listed below, followed by USEC's basis for considering them complete.

- 1. In October 2008, USEC-Paducah developed recurring training for Operations and Maintenance supervisors to reinforce "conduct of" principles and procedure compliance. Training will continue on a quarterly basis for a period of at least twelve (12) months after issuance of the Confirmatory Order.**

#### Actions Taken by USEC

Training Module No. C04728 was developed for Operations and Maintenance personnel to reinforce "conduct of" principles and procedure compliance in performance of routine daily activities. The module was presented to designated personnel on a quarterly basis throughout the 12 months following issuance of the Order. In addition, this periodic training has been incorporated into continuing training for Operation and Maintenance organizations. Topics covered during the training included:

#### Operations Topics:

- |                               |                              |
|-------------------------------|------------------------------|
| - Safety Expectations         | - Oversight                  |
| - Error Reduction Tools       | - Error Likely Situations    |
| - NCS Managing Critical Steps | - Logkeeping                 |
| - Procedure Use Requirements  | - Shift Turnover             |
| - Recent Errors/Issues        | - LOTO Expectations          |
| - Configuration Control       | - Task Preview/Pre-Job Brief |
| - Change Management           |                              |

Maintenance Topics:

- Safety Expectations
- LOTO Expectations
- Shift/Job Turnover
- Error Reduction Tool Focus
- CY2009 Maintenance Performance
- Configuration Control
- Change Management
- Recognizing Error Likely Situations
- Safety Culture
- Effective Pre-Job Briefings
- Procedure Use Requirements
- Oversight
- Command and Control
- NCS
- Logkeeping

All Operations and Maintenance supervisors have completed the "conduct of" training with the exception of individuals who were unable to attend due to medical/military leave. Those individuals have been placed into the training tracking program and will receive the required training upon return to work. This action is complete.

2. **In July 2008, a group of Paducah plant employees attended an INPO course on Human Performance. This group formed the Human Performance Steering team which was established to assist the plant in efforts to prevent among other things, noncompliance with regulatory requirements and other adverse events.**
  - a. **Brainstorming sessions were held with workers to identify practical solutions to preventing adverse events.**
  - b. **Multiple interactive informational training sessions were held with small groups of employees focusing on identifying critical job tasks and the tools to prevent and protect against causing adverse events when performing critical tasks. Sessions in Maintenance and Operations have been completed. This approach will continue for the remainder of the Paducah employees for a period of at least twelve (12) months after issuance of the Confirmatory Order.**

Actions Taken by USEC

Actions taken by USEC are as follows:

1. A Human Performance Steering Team was established in May 2009 to develop a plan to significantly increase the buy-in and routine use of the error prevention tools in organizations other than Operations and Maintenance.
2. Brainstorming sessions with workers and managers in groups outside of Operations and Maintenance were held on May 9, 2009, to obtain input for increasing the buy-in and routine use of error prevention tools. Similar work groups were placed together for the brainstorming sessions. Additionally, workers and managers were placed in separate sessions to help eliminate any barriers to open discussion.

3. Training module GP111CB, *Balance of Plant Human Performance Improvement*, was developed in November 2009. The information provided in the training materials is based on feedback received during the brainstorming sessions along with information contained in INPO documents for reducing errors. Topics covered by the module include:
  - Importance of improving human performance
  - Human performance basics (e.g., types of errors, error likely situations, etc.)
  - Fundamental error prevention tools and at-risk practices for each (Self-Checking, Peer Check/Peer Review, Communication, Task Preview, and Procedure Adherence)
  - Importance of questioning attitude and stopping when unsure
  - Importance of conservative decision-making
  - Importance of signature
  - Management expectations for taking time to do a job right
  - Importance of continually reinforcing error prevention tools
4. The training materials were approved on November 25, 2009, and a pilot session was provided to several Organizational Managers on December 9, 2009. Minor changes were incorporated into the module based on the pilot session (change A). The module was presented to several members of the steering team on January 6, 2010. Additional minor changes were incorporated into the module based on recommendations from the steering team (change B).

As of July 23, 2010, all employees in groups outside of Operations and Maintenance have attended one of the interactive training sessions with the exception of individuals who were unable to attend due to medical/military leave. The individuals have been placed into the training tracking program and will receive the required training upon return to work. In addition to the initial training, refresher training has been incorporated into the training program on a 2-year interval.

Actions were assigned to each site and tracked through the Business Prioritization System. This action is complete.

3. **By no later than sixty (60) calendar days after the issuance of the Confirmatory Order, USEC agrees to develop a "lessons learned" document addressing the lessons learned from the event which gave rise to this mediation, and share those lessons learned with USEC's Paducah Gaseous diffusion Plant, Portsmouth Gaseous Diffusion Plant, Headquarters, the American Centrifuge Plant (ACP) and ACP vendors who handle classified information. After issuance of the lessons learned, USEC will require a response within ninety (90) days which identifies any actions taken by the vendors to address the lessons learned. USEC will track internal actions via the use of its Business Prioritization System.**

Actions Taken by USEC

A Lessons Learned Bulletin, PGLD-LLB-09-004, was prepared and distributed to each site on September 4, 2009. The bulletin stressed the following lessons learned:

1. When performing unfamiliar tasks, make extra efforts to communicate and peer check each step of the process.
2. Do not allow time pressure to influence a decision to short cut proper processes and procedures.
3. Always utilize Error Prevention Tools. Recognize when entering an "error likely situation" such as being unsure or confused regarding a policy, procedure, or guideline or being under time constraints and/or other external pressures to complete an assigned task.
4. If there is any doubt or confusion, stop and request clarification before proceeding in the face of uncertainty. Do not assume the other individual knows the rules.
5. Always use an approved classified mailing address when mailing classified material.
6. If normal U.S. Mail is not utilized, pay special attention to the qualification of the carrier.

Actions were assigned to each site and tracked through the Business Prioritization System. These lessons learned were communicated to affected personnel at PGDP, PORTS, HQ, and ACP including the ACP vendors. Closeout documentation is maintained at each site. This action is complete.

4. **By no later than one-hundred twenty (120) calendar days after the issuance of the Confirmatory Order, USEC agrees to revise the relevant classified material mailing and shipping procedures applicable to USEC's Paducah Gaseous Diffusion Plant, Portsmouth Gaseous Diffusion Plant, USEC Headquarters, and the ACP to clarify the definition of the term "cleared commercial carrier" as that term applies to the mailing or shipping of classified information, and provide associated training.**

Actions Taken by USEC

The definition of "cleared commercial carrier" was developed and flowed down into the following procedures:

- |        |  |
|--------|--|
| PDGP:  | CP4-RM-SE1202, Mailing and Receipt of Classified Matter<br>CP2-SS-SE1036, Classified Matter Protection and Control |
| PORTS: | XP2-SS-SS1039, Handling and Control of Classified Documents  |

ACP Piketon: ACD2-PS-004, Handling and Processing of  
Classified and Safeguards Information Documents  
for offsite Deliveries and Receipts  
AC2-SP-032, Transport of Classified Matter by  
Contract Carrier  
ACP-053, Transport of Classified Matter by  
Contracted Carrier

ACP Oak Ridge: PLD-1690-0004, Offsite Mailing of Classified  
Matter  
PLD-1647-0040, Security Plan for the Shipment of  
Classified Matter

USEC HQ: SPG-01-2010, Classified Matter Mailing and Hand  
Carry Checklist

Training briefings were held at each site to train appropriate personnel on procedural changes. These training sessions were tracked and documented at each site. In addition to the procedural changes that were required by the Order, a briefing module was developed to provide additional training on the Facility Address Report, a listing provided by the Cognizant Security Agency to inform authorized users specific security information related to facilities and their capabilities. This module was provided to appropriate managers and personnel who perform classified matter off-site mailing or shipments, including personnel that only package for off-site mailing or shipment. This action is complete.