



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
245 PEACHTREE CENTER AVENUE NE, SUITE 1200
ATLANTA, GEORGIA 30303-1257

December 17, 2010

Mr. David Precht
Manager, Columbia Plant
Westinghouse Electric Company
Commercial Nuclear Fuel Division
5801 Bluff Road, Drawer R
Columbia, SC 29250

SUBJECT: WESTINGHOUSE ELECTRIC COMPANY- NOTICE OF VIOLATION AND NRC
INTEGRATED INSPECTION REPORT NO. 70-1151/2010-012

Dear Mr. Precht:

This refers to the inspection conducted from November 15 - 19, 2010, at the Westinghouse Electric Company (Westinghouse) facility (Inspection Report No. 70-1151/2010-012, enclosed). The purpose of the inspection was to perform a routine review of the implementation of the environmental protection and permanent plant modifications programs. The review was performed to determine whether activities authorized by the license were conducted safely and in accordance with NRC requirements. At the conclusion of the inspection, the findings were discussed with you and members of your staff on November 19, 2010.

The inspection was an examination of activities conducted under your license as they relate to safety and compliance with the Commission's rules and regulations and with the conditions of your license. The inspection consisted of facility walk downs; selective examinations of relevant procedures and records; examinations of safety-related structures, systems, equipment and components; interviews with plant personnel; and observations of plant conditions and activities in progress. Throughout the inspection, observations were discussed with your managers and staff.

Based on the results of this inspection, the NRC has determined that a Severity Level IV violation of NRC requirements occurred.

The violation was evaluated in accordance with the NRC Enforcement Policy. The current Enforcement Policy is 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 are described in detail in the subject inspection report. The violation is being cited in the Notice because the NRC identified that you had failed to meet the requirements as specified in Section 3.1.1 of your license application for the designation of new items relied on for safety.

You are required to respond to this letter and should follow the instructions specified in the enclosed Notice when preparing your response. For your consideration and convenience, an

excerpt from NRC Information Notice 96-28, "Suggested Guidance Relating to Development and Implementation of Corrective Action," is enclosed. If you have additional information that you believe the NRC should consider, you may provide it in your response to the Notice. The NRC review of your response to the Notice will also determine whether further enforcement action is necessary to ensure compliance with regulatory requirements.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter, its enclosures, and your response, if you choose to provide one for cases where a response is not required, 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 or proprietary, information so that it can be made available to the Public without redaction.

Sincerely,

/RA by M. Thomas for/

Marvin D. Sykes, Chief
Fuel Facility Branch 3
Division of Fuel Facility Inspection

Docket No. 70-1151
License No. SNM-1107

Enclosures: 1. Notice of Violation
2. Inspection Report No. 70-1151/2010-012

cc w/encls:
Marc Rosser
Manager
Environment, Health and Safety
Commercial Nuclear Fuel Division
Electronic Mail Distribution

Susan E. Jenkins
Assistant Director, Division of Waste Management
Bureau of Land and Waste Management
Department of Health and Environmental Control
Electronic Mail Distribution

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PUBLICLY AVAILABLE NON-PUBLICLY AVAILABLE SENSITIVE NON-SENSITIVE
 ADAMS: Yes ACCESSION NUMBER: _____ SUNSI REVIEW COMPLETE

OFFICE	RII: DFFI	RII: DFFI	NMSS	RII: DFFI			
SIGNATURE	/RA by MC for SM/	/RA by MC/	/RA by CF via email/	/RA by MT/			
NAME	S Mendez	M Crespo	C Fisher	MThomas			
DATE	12/16/2010	12/16/2010	12/16/2010	12/17/2010	12/ /2010	12/ /2010	12/ /2010
E-MAIL COPY?	YES NO	YES NO	YES NO	YES	YES NO	YES NO	YES NO

OFFICIAL RECORD COPY DOCUMENT NAME: G:\DNMS\INFFBII\REPORTS\DRAFT INSPECTION REPORT FOLDER\WESTINGHOUSE\WESTINGHOUSE IR 2010-012 (ENV&PPM).DOCX

Letter to: David Precht from Marvin D. Sykes dated December 17, 2010.

Subject: NUCLEAR REGULATORY COMMISSION INSPECTION REPORT
NO. 70-1151/2010-012 AND NOTICE OF VIOLATION

Distribution w/encls:

M. Sykes, RII
M. Thomas, RII
P. Habighorst, NMSS
C. Ryder, NMSS
PUBLIC

NOTICE OF VIOLATION

Westinghouse Electric Company
Columbia, SC

Docket No. 70-1151
License No. SNM-1107

During an NRC inspection completed on November 19, 2010, a violation of NRC requirements was identified. In accordance with the NRC Enforcement Policy, the violation is listed below:

Safety Condition No. S-1 of Special Nuclear Material License No. 1107 requires that material be used in accordance with statements, representations, and conditions in the license application dated June 27, 2007, or as revised, pursuant to 10 CFR 70.32 or 10 CFR 70.72 and the supplements thereto.

Section 3.1.1, "Configuration Management (CM) Program Structure," of the license application states, in part, that "the Columbia Fuel Fabrication Facility Configuration Management program is implemented in accordance with approved procedures for change management. These procedures define the review and approval process for assuring that new or modified structures, systems and components comply with applicable regulatory requirements."

Section 6.1.7 of procedure RA-108, "Safety Significant Controls," Revision 30, dated January 30, 2009, states, "New Safety Significant Controls shall be functionally tested or verified as part of the TA-500 and RAF-104 process, including documentation, prior to actual use."

Contrary to the above, on June 12, 2009, the licensee failed to functionally test or verify 12 new safety significant controls related to dust collectors (Torrits) prior to actual use. On June 12, 2009, the licensee had re-designated the high-level probes on the dust collectors as a safety significant control. However, the licensee only tested the probes that had been identified as needing modifications before to the re-designation. Therefore, 12 high-level probes were not tested as part of the re-designation process. The safety significance of the event was low due to additional controls in place on the dust collectors.

This is a Severity Level IV violation (Section 6.2).

Pursuant to the provisions of 10 CFR 2.201 Westinghouse Electric Company 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, 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," and should include: (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, 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 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, it should not include any personal privacy, proprietary, or safeguards information so that it can be made available to the public without redaction. If personal privacy or proprietary information is necessary to provide an acceptable response, then please provide a bracketed copy of your response that identifies the information that should be protected and a redacted copy of your response that deletes such information. If you request withholding of such material, you must specifically identify the portions of your response that you seek to have withheld and provide in detail the bases for your claim of withholding (e.g., explain why the disclosure of information will create an unwarranted invasion of personal privacy or provide the information required by 10 CFR 2.390(b) to support a request for withholding confidential commercial or financial information). If safeguards information is necessary to provide an acceptable response, please provide the level of protection described in 10 CFR 73.21.

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

Dated this 17th day of December, 2010

U. S. NUCLEAR REGULATORY COMMISSION

Docket No.: 70-1151

License No.: SNM-1107

Report No.: 70-1151/2010-012

Licensee: Westinghouse Electric Company

Location: Columbia, South Carolina

Inspection Dates: November 15 through 19, 2010

Inspectors: Manuel Crespo, Senior Fuel Facility Inspector
Christian Fisher, Fuel Facility Inspector
Sandra Mendez, Fuel Facility Inspector (In-Training)

Approved by: Marvin Sykes, Chief
Fuel Facility Inspection 3
Division of Fuel Facility Inspection

EXECUTIVE SUMMARY

Westinghouse Electric Company NRC Inspection Report 70-1151/2010-012

Introduction

Staff of the U.S. Nuclear Regulatory Commission (NRC) performed a routine and announced permanent plant modifications and environmental protection inspection of the Westinghouse Electric Company, Columbia, South Carolina facility from November 15 through 19, 2010.

Permanent Plant Modifications

- The licensee adequately implemented design and safety reviews for modifications to the facility. However, a violation of NRC requirements was identified for failure to functionally test or verify 12 new safety significant controls prior to actual use.

Environmental Protection

- The licensee adequately implemented the requirements of the environmental protection program. In addition, the licensee's assessment of dose from its radiological activities indicated public dose adequately below regulatory requirements.

REPORT DETAILS

1. Summary of Plant Status

Westinghouse Electric Company (WEC) manufactures light water reactor fuel at its Columbia, SC facility. During the inspection, normal production activities were ongoing.

2. Permanent Plant Modification (IP 88070)

a. Inspection

(1) Scope and Observations

The inspectors evaluated a sample of completed plant modifications (changes incorporated into the 2010 Integrated Safety Analysis Summary update and changes completed in calendar year 2010). The inspectors evaluated the modifications to verify that the licensee was appropriately complying with the requirements of 10 CFR 70.62. In addition, the inspectors walked down select modifications with the process engineer to independently evaluate design assumptions used as part of the safety evaluations. The inspectors reviewed selected aspects of the following documents:

- Configuration Control Forms: 07130, 08202, 08557, 09310, 09803, 09432, 09594, 09701, 09800, 10001, 10093, 10094, 10280, 10338, and 10339
- Independent Technical Review Report Transmittal Memo, PSED0C0000226
- Work Orders: 476360, 510385, 510386, 515115, and 517799
- COP-811601, Rev. 26, 09/29/09
- COP-811603, Rev. 0, 09/16/10
- Drawing 336F03P101, Precipitators (V-305 A&B) PI&D, Rev. C2
- Drawing 336F03EQ01, Precipitator V-305A Nozzle C&D, Rev. C2
- Drawing 336F03EQ01, Precipitator V-305A Vessel V-305, Rev. C3
- Drawing 336F03EQ01, Vessel 305 A&B Precipitator Column, Rev. C3
- Drawing 337F03PI01, Precipitator (V-405B) PI&D, Rev. 23
- Drawing 337F03EQ01 Precipitator V-405 B Vessel V-405B, Rev 3
- Drawing 337F03EQ01, Precipitator V-405B Nozzle C&D Insert Details, Rev. 1

(2) Conclusions

No violations of NRC requirements were identified.

b. Programmatic Review and Problem Identification and Resolution

(1) Scope and Observations

The inspectors followed up on unresolved item (URI) 70-1151/2010-003-01, "Failure of item relied on for safety (IROFS) to pass functional check." This item was identified in May 2010 when inspectors observed the performance of a functional test of dust collector probes. The functional test was performed to confirm that the required audible and visual alarms actuated in the event that powder levels reached a determined setpoint. The test identified that the high-level audible alarm would not actuate as

required. Specifically, the high-level probe for this dust collector did not have an audible alarm installed. Due to this deficiency, the licensee declared the IROFS as degraded and entered the issue in the corrective action program. Following discussions with licensee representatives, the inspectors noted that the high-level dust collector probe had been designated as an IROFS in June 2009. However, the functional verification in May 2010 was the first functional check since being designated as an IROFS.

The inspectors reviewed the corrective actions taken to address the failed functional test and noted that remaining high-level audible alarms for the dust collectors functioned appropriately. However, during the review of the licensee's extent of condition, the inspectors noted that 12 of the high-level probes had not been tested prior to use, following the designation of the high level probes as IROFS. The licensee had limited the testing of the newly designated IROFS to those level probes that required an equipment modification. The 12 high-level probes were identified as not requiring a modification and therefore were not tested. Instead, the licensee assumed that the previous preventive maintenance testing for non-IROFS would be adequate. However, one of the 12 probes was not equipped with the audible alarm and therefore could not pass the new IROFS functional test.

Section 3.1.1, "Configuration Management (CM) Program Structure," of the license application states, in part, that "the Columbia Fuel Fabrication Facility Configuration Management program is implemented in accordance with approved procedures for change management. These procedures define the review and approval process for assuring that new or modified structures, systems and components comply with applicable regulatory requirements." Section 6.1.7 of procedure RA-108, "Safety Significant Controls," Revision 30, dated January 30, 2009, states, "New Safety Significant Controls shall be functionally tested or verified as part of the TA-500 and RAF-104 process, including documentation, prior to actual use." Contrary to the above, on June 12, 2009, the licensee failed to functionally test or verify 12 new safety significant controls related to dust collectors (Torrirts) prior to actual use. The safety significance of the violation was low due to additional controls in place on the dust collectors that ensured that the performance requirements were met. However, the licensee had not recognized that 12 high-level probes had not been properly tested prior to use following the IROFS designation. This issue will be tracked as violation (VIO) 70-1151/2010-012-01, "Failure to test IROFS prior to use," and will close URI 70-1151/2010-003-01.

The licensee entered this finding into the corrective action program as Commitment #10-167-C010.02. The licensee proposed a revision to procedure RA-314, "Implementation of Criticality Safety Evaluations" to explicitly verify that newly designated controls are functionally verified prior to approval for operation.

Also, as part of the programmatic review of the licensee's configuration control program, the inspectors reviewed selected aspects of the following configuration control program related documents:

- TA-500, "Columbia Manufacturing Plant Configuration Control," Rev 22, May 28, 2009
- Criticality Safety Evaluation Implementation Plan, "CSE for the URRS Decon Room Torrirts Ventilation Systems"
- RA-108, "Safety Significant Control," Rev 30, January 30, 2009

- RA-108, "Safety Significant Control," Rev 31, June 16, 2009
- RA-104, "Regulatory Review of Configuration Change Authorizations", Rev 24, May 21, 2009

(2) Conclusions

A violation of NRC requirements was identified for failure to functionally test or verify 12 new safety significant controls prior to actual use.

3. Effluent Control and Environmental Protection (IP 88045)

a. Management Controls and Procedures

(1) Scope and Observations

The inspectors reviewed program, procedural and organizational changes since the previous inspection to determine if the changes were consistent with license requirements. The inspectors determined, through interviews with your staff, that no major changes in the environmental program, with regards to organizational units or individuals implementing the program, occurred. The inspectors reviewed a sample of the new procedures and determined that there was not a significant change to the current environmental program. Westinghouse was currently undergoing review to be ISO-14001 certified. To achieve this certification Westinghouse created new procedures to formalize the Environmental Management System (EMS). However, it did not significantly change the environmental program.

Through the review of audits the inspectors determined that your staff is auditing the environmental organization within the required frequency. Also, items that are found during the audit process were being captured into the corrective action program. The audit of one supplier identified a potential problem with not sending items out fast enough with another supplier. This finding resulted in an audit of the second supplier and demonstrated to the inspectors that corrective actions were being taken to remedy audit deficiencies.

The inspector reviewed selected aspects of the following documents:

- EHS-AUDIT-09-7, "Report of EH&S Audit No. EHS-09-7 Environmental Protection Program," September 10, 2009
- EHS-AUDIT-09-20, "Environmental Health & Safety EHS-AUDIT-09-20 Stormwater Pollution Prevention," January 14, 2010
- LTR-EHS-09-111, "EH&S Department Status Meeting Minutes," December 9, 2009
- LTR-EHS-09-117, "Supplier Audit of General Engineering Laboratories, LLC, EHS-AUDIT-09-14," December 16, 2009
- EHS-AUDIT-10-8, "Supplier Audit of Carolina Technical Services, Inc." June 11, 2010
- LTR-EHS-10-20, "Supplier Audit of Shealy Environmental Services, Inc., EHS-AUDIT-10-2," February 15, 2010
- LTR-EHS-10-26, "2010 EH&S Program and Formal Compliance Audit Schedule," March 3, 2010

- “2009 ALARA Report,” September 16, 2010
- RA-106, “Internal Program, Formal Compliance and Supplier Audits,” Rev 20, August 12, 2010
- RA-416, “SC-DHEC Proficiency Testing (PT) Protocol,” Rev 0, May 27, 2010
- RA-420, “CFFF Environmental Management System (EMS),” Rev 0, October 27, 2010

(2) Conclusions

No violations of NRC requirements were identified.

b. Quality Control of Analytical Measurements

(1) Scope and Observations

The inspectors accompanied technical staff in the health physics laboratory to observe samples being prepared and counted. The inspectors noted that the equipment used was properly calibrated in the health physics laboratory. The health physics laboratory is used to count samples related to the airborne effluent samples collected. Liquid effluent samples were sent to offsite laboratories. The inspectors reviewed selected aspects of the following documents:

- ROP-01-025, “Calibration of the TENNELEC Automatic Sample Counters,” Rev 16, April 24, 2008
- ROP-01-026, “TENNELEC Background and Efficiency Operations,” Rev 13, June 10, 2010

(2) Conclusions

No violations of NRC requirements were identified.

c. Program Implementation

(1) Scope and Observations

The inspectors reviewed the previous year’s semi-annual discharge reports that were sent to the NRC’s Office of Nuclear Materials Safety and Safeguards (NMSS) as required by 10 CFR 70.59. The inspectors verified through interviews that Westinghouse does not have any disposal on site, nor do they have a history of onsite disposal. The inspectors reviewed selected aspects of the following documents:

- LTR-RAC-10-14, “SNM-1107/70-1151 NRC Semi-annual Discharge Report July 2009 - December 2009,” March 2, 2010, Rev 1
- LTR-RAC-10-57, “SNM-1107/70-1151 NRC Semi-annual Discharge Report January 2010 – June 2010,” August 27, 2010
- RA-413, “NRC Semi-Annual Effluent Discharge Report,” Rev 1, September 23, 2010

(2) Conclusions

No violations of NRC requirements were identified.

d. Radioactive Liquid and Airborne Effluents(1) Scope and Observations

The inspector reviewed the letter for the 2009 public dose assessment and determined that the public dose had been properly calculated using the Regulatory Guide (RG) 1.109 for the liquid effluent and the Environmental Protection Agency's (EPA) COMPLY code for the airborne effluents. Westinghouse had a calculated public dose of 0.157 millirem, which is below the 25 millirem regulatory limit. The inspector reviewed selected aspects of the following documents:

- LTR-EHS-10-96, "Assessment of Public Radiological Dose from Liquid and Gaseous Effluents for Calendar Year 2009," August 30, 2010, and related attachments
- ROP-06-001, "NPDES Daily, Weekly, and Monthly Effluent Sample Collection," Rev 24, September 2009
- ROP-06-002, "Roof Effluent Air Sampling Counting," May 2009, Rev 19
- ROP-06-004, "Determination of Gaseous Fluoride using Calcium Oxide Papers," Rev 4, April 13, 2006
- ROP-06-006, "Collection of Routine Weekly and Monthly Environmental Samples," Rev 17, February 11, 2010
- ROP-06-007, "Goundwater Well Sampling," Rev 14, July 29, 2010
- ROP-06-009, "Monthly Columbia Plant Measured Discards Report," Rev 4, January 28, 2010
- CF-83-026, "Process Waste Treatment Lagoon Discharge Sequence," Rev 9, January 29, 2009
- Nuclear Fuel Services (NFS) Certificate of Analysis for LE Uranyl Nitrate Solution, Batch Number 440-DLEU-166, August 30, 2010
- NFS Certificate of Analysis for LE Uranyl Nitrate Solution, Batch Number 440-BLEU-175, November 11, 2010

The inspectors verified through interviews and observations that Westinghouse only has one liquid discharge point, which goes to the Congaree River. The inspectors also observed Westinghouse staff collecting liquid effluent and airborne samples. Once the samples were collected, the inspectors observed the staff preparing the samples for analysis.

Inspectors verified that the isotopic composition of uranyl nitrate being received from NFS is within the product specifications. These product specifications ensure that Westinghouse does not need to modify their analysis to include more isotopes of uranium when analyzing liquid and gaseous effluents.

(2) Conclusions

No violations of NRC requirements were identified.

e. Problem Identification and Resolution

(1) Scope and Observations

The inspectors reviewed a selection of Redbook items and corrective action program (CAP) entries that had the potential to impact the environmental protection program. The CAP items had been identified through supplier audits and a previous NRC inspection (inspection report 70-1151/2009-006). The CAP and Redbook items that had been closed had appropriate steps taken to close the items out. The inspectors reviewed selected aspects of the following documents:

- CAP #09-268-C002, "Environmental Liquid Analyses"
- CAP #10-046-C006, "Supplier Audit of Shealy Environmental Services, Inc., EHS-AUDIT-10-2"
- CAP #10-167-C010, "NRC INSPECTION REPORT NO. 70-1151/2010-003 Unresolved Item (URI) Failure of IROFS to pass a functional check."
- CAP #10-167-C010.02, "CSE Implementation Procedures for Functional Verifications"
- CAP #10-162-C010, "Vendor Audit of CTSI"
- Redbook Item 14988, September 16, 2009
- Redbook Item 15680, February 2, 2010
- Redbook Item 16098, June 28, 2010
- Redbook Item 16142, July 30, 2010
- Redbook Item 16165, August 17, 2010

(2) Conclusions

No violations of NRC requirements were identified.

4. 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 November 19, with the licensee's management. No dissenting comments were received from the licensee. Proprietary information was discussed but not included in the report.

SUPPLEMENTARY INFORMATION

1. Items Opened, Closed, and Discussed

Opened

70-1151/2010-012-01 VIO Failure to test IROFS prior to use

Closed

70-1151/2010-003-01 URI Failure of IROFS to pass functional check.

2. Inspection Procedures Used

IP 88070 Permanent Plant Modifications
IP 88045 Environmental Protection

3. Partial List of Persons Contacted

*D. Gvaham
*L. Brown-Lee
J. Hoppz
*E. Byrd
*D. Colwell
W. Septko
H. Green
*R. Bates
B. Phillips
*R. Winiarski
*R. Likes
*D. Baustert
*J. Hentschel
*D. Precht
*B. Borer
*C. Snyder
*M. Rosser
*J. Peterson
*T. Gregg
*G. Couture
*E. Binns

*Attended the exit meeting on November 19, 2010.

4. List of Acronyms and Abbreviations

ADAMS	Agency-Wide Document Access and Management System
CAP	corrective action program
CFR	Code of Federal Regulation
CTSI	Carolina Technical Services, Inc.
EH&S	environment health & safety
EMS	environmental management system
EPA	Environmental Protection Agency
IFI	inspector follow-up item
IP	inspection procedure
IROFS	item relied on for safety
NFS	Nuclear Fuel Services
NMSS	NRC's Office of Nuclear Materials Safety and Safeguards
NRC	Nuclear Regulatory Commission
PT	proficiency testing
UF ₆	uranium hexafluoride
URI	unresolved item
RG	Regulatory Guide
SC-DHEC	South Carolina Department of Health and Environmental Control
SSC	safety significant controls