

DEC 22 2010

LES-10-00260-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 70-3103/2010-014

Reference: Letter from J. Calle (NRC) to D. Sexton (LES), NRC Inspection Report  
No. 70-3103/2010-014 and Notice of Violation, dated December 9, 2010

In response to the referenced NRC Notice of Violation (Notice), URENCO USA (UUSA) herewith provides the enclosed reply (Enclosure). This violation relates to Section 3, "Design Control," of UUSA's Quality Assurance Program Description (QAPD).

Pursuant to instructions specified in the Notice, the enclosed UUSA reply (Enclosure) includes for the violation: 1) the reason for the violation; 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.

Should there be any questions regarding this submittal, please contact Wyatt Padgett, LES Licensing Manager, at 575.394-5257.

Respectfully,



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

Enclosure: Reply to Notice of Violation 07-3101/2010-014

IE07

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**ENCLOSURE**

**LOUISIANA ENERGY SERVICES/URENCO USA (LES/UUSA)**

**REPLY TO NOTICE OF VIOLATION (NOTICE) 70-3103/2010-014-002**

**Restatement of Violation:**

*During an NRC inspection conducted on October 4-7, 2010, a violation of NRC requirements was identified. In accordance with the NRC Enforcement Policy, the violation is listed below:*

*Special Nuclear Material (SNM) License No. 2010 requires, in part, that the licensee shall conduct authorized activities at the Louisiana Energy Services, L.L.C., National Enrichment Facility (LES NEF) in accordance with statements, representations, and conditions in the approved Quality Assurance Program Description (QAPD), dated April 9, 2004, and supplements thereto. The LES NEF QAPD commits to American Society of Mechanical Engineers (ASME) NQA-1-1994, Quality Assurance Requirements for Nuclear facility Applications, including supplements as revised by the ASME NQA-1a-1995 Addenda for implementation of 10 CFR 50 Appendix B.*

*Section 3, "Design Control," of the LES NEF QAPD and Basic Requirement 3, "Design Control," of NQA-1-1994 states, in part, that changes to final designs, field changes, and modifications to the operating facility, shall be governed by control measures commensurate with those applied to the original design.*

*Contrary to the above, prior to October 4, 2010, the licensee modified the process piping associated with Cascade 1 without conducting the required design activities commensurate with those applied to the original design of the subject piping. The modification included cutting and subsequently re-welding a section of the Cascade 1 process piping.*

*This is a Severity Level IV violation (Supplement 6.2.d)*

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**UUSA Reply to Violation:**

1) The Reason for the Violation

This was a human performance event. The reason for the violation was that inadequate knowledge and skills of effective planning/procedure writing led to the development of a work plan and execution that lacked sufficient detail to ensure that scope, quality, compliance, configuration, and other requirements could be controlled. In summary, the apparent and contributing causes were:

- Worker Knowledge and Skills Less Than Adequate
- Procedure Level of Detail Less Than Adequate
- Communication Less Than Adequate/Improper Mental Model

- Supervisory Oversight Less Than Adequate

2) The Corrective Steps That Have Been Taken and Results Achieved

Corrective actions (steps) that have been taken pursuant to the applicable Condition Report (CR 2010-3207) are as follows:

- CR Action No. 1 – An appropriate and approved plant modification (encompassing Design Change Notice DCN 2010-001 (Cascade 1 Bung Removal) and the associated 70.72 review) was included in Work Order WO 3003881 prior to closure of the work package and restart of Cascade 1 (thereby conducting design activities commensurate with those applied to the original design of the subject piping). [Action Completed on October 29, 2010]
- CR Action No. 2 - A memorandum was issued by the Maintenance Manager to the appropriate Maintenance personnel to communicate the management expectation that for work plans associated with QL-1 and QL-2 activities, the primary supervisor shall be a UUSA employee, or the appropriate representative of a vendor/contractor listed in the ASL approved for the performance of that work; and reinforce the expectation that when work is assigned to an approved vendor/contractor, oversight responsibility is maintained by the Maintenance management staff. [Action Completed on October 28, 2010]
- CR Action No. 3 - Copies of the CR problem description and Detailed Apparent Cause Evaluation (DACE) report were shared with the Maintenance staff (as maintenance support required reading). [Action Completed on October 29, 2010]
- CR Action No. 4 - Training Needs Analyses were performed for 1) Human Performance Error Reduction Techniques/Verification and Validation; and 2) Level of Detail; Work Control Process Changes; Contractor Oversight. [Action Completed on November 15, 2010]
- CR Action No. 6 - Work Control Procedure WC-3-1000-02, "Work Package Development, Issuance, and Closure" was revised to include specific steps to ensure the appropriate implementation of the Plant Modification process. [Action Completed on October 28, 2010]
- CR Action No. 7 - A (CR 2010-3207) Lessons Learned briefing was conducted by the Maintenance Manager for the Maintenance organization. [Action Completed on November 18, 2010]

3) The Corrective Steps That Will Be Taken

Pursuant to CR 2010-3207, Action No. 5, training (derived from the training needs analyses in CR Action 4 above) will be performed for planners on:

- Human Performance Error Prevention Tools (for office workers)

- Technical Writing
- The 70.72 Process
- The QAPD

[Action No. 5 Scheduled Completion Date: January 28, 2011]

4) The Date When Full Compliance Will Be/Was Achieved

Full compliance was achieved on October 29, 2010, upon completion of CR Action No. 1 above. Further actions entailing training activities derived from the training needs analyses are scheduled for completion by January 28, 2011.