



June 21, 2011  
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U.S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Director, Office of Nuclear Material Safety  
and Safeguards  
11555 Rockville Pike  
One White Flint North  
Rockville, MD 20852

Gentlemen:

**Subject: Response to Confirmatory Order EA-09-272; AREVA NP Inc.; License No. SNM-1227**

Ref.: Letter, Luis A. Reyes (NRC) to Charles Perkins (AREVA), "Confirmatory Order (Effective Immediately) [NRC Office of Investigation Report No. 2-209-025]," dated April 26, 2010.

Attached is AREVA NP Inc.'s response for satisfying the terms of the confirmatory order described in the referenced letter.

If you have questions or require further information, please contact me at 509-375-8409.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Robert Link', followed by a large, stylized checkmark or flourish.

R. E. Link, Manager  
Environmental, Health, Safety & Licensing

Enclosures

cc: Victor McCree  
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## Response to Confirmatory Order EA-09-272

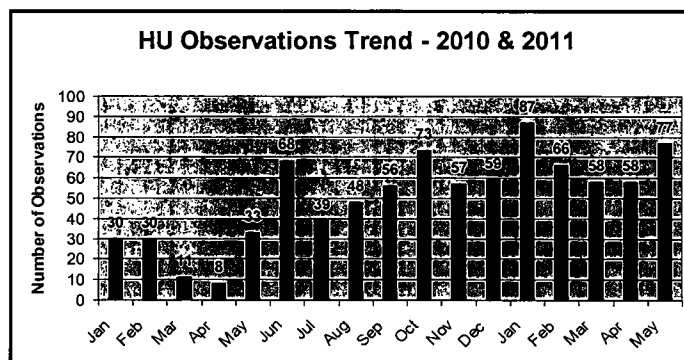
### Terms for Satisfying the Confirmatory Order

- a. AREVA will incorporate lessons learned from this incident, including enhanced SCWE training, into General Employee Training for new employees and annual refresher training for all AREVA Richland employees.
  - Lessons learned and Safety Conscious Work Environment (SCWE) training have been incorporated in the following training:
    - HU-100101: Human Performance for New Hires. This is included as a portion of a one-time classroom based training for new hire AREVA employees and contractors. It is a basic training which includes discussions of self check, peer check, pre-job brief, procedure use and adherence and questioning attitude without fear of retribution.
    - TMS-500018: SafeStart-SCWE Orientation for New Employees. This is included as a portion of a one-time classroom based training for new hire AREVA employees and contractors. It includes discussion on reporting of events without fear of retribution.
    - IND-500001: HRR Site Access Refresher Training. This is the annual computer based training for all AREVA and contractor personnel on site. It is recurring training that is scheduled to be completed annually based on the hire date or previous completion date.
- b. AREVA will implement a management observation program at Richland for the purpose of reinforcing task performance standards and work practices.
  - AREVA implemented a human performance observation program formally in January 2010 for its U.S. Fuels division. The system is documented in Administrative Procedure 1732-01, "Human Performance Observation Program". The process is patterned after INPO guidelines and the practices of AREVA's utility customers.

Several forms are available for the recording of observations relating to safety, process effectiveness, plant and equipment conditions including housekeeping, and the observed use of human performance tools. Supervisory and management personnel are encouraged to perform at least one observation per month, and many professional non-supervisory employees also perform observations. Observers are expected to take action for unsatisfactory observations, such as coaching, reporting findings to appropriate managers or area owners, or writing Condition Reports within the Corrective Action System.

Observation records are collected, reviewed and entered in a database for future analysis and trending. The Manager, Business Improvement reviews the results each month in Corrective Action Review Board (CARB) meetings with AREVA management.

Since implementation of the program, more than 850 observations have been recorded.



- c. AREVA Richland Site Operations will perform a survey to determine the results of efforts to increase supervisor availability in the work area.
- The results and summary of the survey are included in AREVA's corrective action system (WebCAP) Condition Report (CR) 2009-2383 Actions 17 and 19. The survey topics focused on Supervisor interaction time, responsiveness, floor time and encouragement to raise concerns. It provided both Supervisor and Operator responses. In general, both the Supervisors and Operators felt that their interaction time had increased and responsiveness was the same or better.
  - The above noted observation program continues to emphasize the importance of effective floor time by managers and supervisors.
- d. AREVA will develop a presentation and offer to present the detail of this incident and lessons learned with regard to work practices to a future industry forum such as the annual Fuel Cycle Information Exchange.
- A presentation on this incident and lessons learned was made at the Fuel Cycle Information Exchange by Bob Link on June 30, 2010. A copy of the presentation is included in Attachment A.
- e. AREVA agrees to complete the above items within 12 months of issuance of this Confirmatory Order.
- Confirmatory Order EA-09-272 was issued on April 26, 2010. CR 2009-2383, written on April 22, 2009, documented the event and tracked the evaluation (Root Cause Analysis) and associated corrective actions (summarized in Section 2 of the Confirmatory Order). Actions associated with the Confirmatory Order Section 3 were added to, and tracked in, the CR. The Confirmatory Order actions have been completed and the CR was closed by the Manager EHS&L on April 1, 2011.
- f. Within three months of completion of the terms of this Confirmatory Order, AREVA will provide the NRC with a letter discussing its basis for concluding that this Confirmatory Order has been satisfied.
- This letter discusses the basis for concluding that the Order has been satisfied.