



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

August 3, 2011

Mr. Dominique Grandemange
Site Manager
AREVA NP, Inc.
2101 Horn Rapids Road
Richland, WA 99354-0130

SUBJECT: ERRATA - AREVA NP, INC (RICHLAND) – NOTICE OF VIOLATION AND NRC
INTEGRATED INSPECTION REPORT NO. 070-1257/2011-003

Dear Mr. Grandemange:

On July 29, 2011, the United States Nuclear Regulatory Commission (NRC) issued the subject NRC Integrated Inspection Report 07001257/2011003 for Areva NP, Inc (Richland) ADAMS ML11210677. In reviewing this report it was noted that in Section 6b, the notation for the violation was incorrect. The correct notation is VIO 70-1257/2011003-001. It was also noted that in Section 9, the notation for the inspector follow-up item 2008001-01 was incorrect. The correct notation is 2011004-01. Lastly, it was noted that both the notation for the violation and the inspector follow-up item were incorrect in the attachment to the report Section 2. The correct notations have been made as stated above. Accordingly, we are providing a revised version of the inspection report that includes the notations.

Should you have any questions concerning this letter, please contact me at 404-997-4629.

Sincerely,

/RA by Mary Thomas for/

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

Docket No. 070-1257
License No. SNM-1227

Enclosure: As stated

cc w/encls: (See page 2)

August 3, 2011

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PUBLICLY AVAILABLE NON-PUBLICLY AVAILABLE SENSITIVE NON-SENSITIVE
ADAMS: Yes ACCESSION NUMBER: ML112150311 SUNSI REVIEW COMPLETE FORM 665 ATTACHED

OFFICE	RII:DFFI						
SIGNATURE	/RA/						
NAME	MThomas						
DATE	08/03/2011	8/ /2011	8/ /2011	8/ /2011	8/ /2011	8/ /2011	8/ /2011
E-MAIL COPY?	YES NO	YES NO	YES NO	YES NO	YES NO	YES NO	YES NO

OFFICIAL RECORD COPY DOCUMENT NAME: G:\DNMS\I\FB\I\REPORTS\INSPECTION REPORT FOLDER\AREVA - RICHLAND\2ND QUARTER 2011 INPUT\ERRATA AREVA RICHLAND 2011-003.DOCX

cc w/encl:

Thomas Scott Wilkerson, Vice President, Engineering
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Lynchburg, Virginia 24501

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Earl Fordham
Eastern Regional Director
Office of Radiation Protection
Department of Health
309 Bradley Boulevard, Suite 201
Richland, Washington 99352

Letter to Mr. Dominique Grandemange from Marvin D. Sykes dated August 3, 2011

Subject: ERRATA - AREVA NP, INC (RICHLAND) – NOTICE OF VIOLATION AND NRC
INTEGRATED INSPECTION REPORT NO. 070-1257/2011-003

Distribution w/encls:

M. Thomas, RII
O. López, RII
R. Rodriguez, NMSS
M. Diaz, NMSS
M. Sykes, RII
R. Cohen, RIV
W. Walker, RIV

designated that only after completing all of the required readings, on-the-job trainings, exams, and skill demonstrations, that the employees were qualified for that workstation. The procedure stated that until those items were completed, the employees may not work independently at that workstation. The licensee entered the failure to maintain qualified operators for this workstation in the corrective action program as an NRC inspector identified condition report, 2011-3213. In addition, one of the operators was working as an On-The-Job Instructor despite his unqualified status. The licensee entered this concern as an NRC inspector identified condition report, 2011-3596.

Analysis: The inspectors determined that the three individuals had not been tested or qualified on the affected workstation which included operating instructions for two administrative IROFS which served as criticality moderation controls. The training program failed to ensure that qualified operators were assigned to safety-significant positions. The inspectors determined that the two administrative IROFS were not degraded due to the unqualified status of the operators.

Enforcement: Section 11.3.2, Training and Qualification for Positions/Activities Impacting IROFS, of Revised License Renewal Application, dated December 10, 2008, states, in part that "Employees assigned to positions/activities involving licensed materials shall be appropriately qualified and trained so as to conduct their job duties in a way that does not adversely impact safety and in particular the availability and reliability of measures designated as IROFS in the ISA Summary. Trainee understanding and command of learning objectives shall be evaluated." Upon discovery of the noncompliance, the licensee limited the unqualified operators from independent operation of the affected workstation and opened two condition reports; 2011-3213 and 2011-3596. The inspectors determined that the licensee had been out of compliance since March 2010. The potential for a safety consequence existed; however safety was not negatively affected by the unqualified operator status as the administrative IROFS were not degraded. This Severity Level IV violation will be tracked as VIO 70-1257/2011003-001.

c. Conclusions

The inspectors determined that the Operator Training program was in compliance with the license, with one exception. The inspectors identified a violation of the license involving the qualification of workers at a work station in the Blended Low-Enriched Uranium area.

6. **Management Organization and Control (IP 88005)**

a. Inspection Scope and Observations

Organization Structure – The inspectors reviewed changes in personnel significant to the License Application requirements that occurred since the previous review of NRC IP 88005, Management Organization & Controls. Based on those changes, the inspectors reviewed the qualifications of one individual and determined that the changes were done in accordance with the License Application.

Immediately after the termination of the exercise, the licensee conducted a critique in which both members of the PERMT and PERT actively participated and provided comments on those aspects of the response that worked well as well as those aspects that needed improvement. Members of the licensee's emergency preparedness staff facilitated the critique and documented the comments. The inspectors determined that the critique held by the licensee was adequate. The inspectors verified that deficiencies identified in previous exercises and drills, including the previous NRC-graded exercise, were documented in the licensee's corrective action program and that those issues were appropriately characterized and tracked until corrective actions were implemented.

b. Conclusions

No findings of significance were identified with regard to emergency preparedness or the conduct of exercises or drills.

9. Follow-up on Previously Identified Issues

(Closed) Inspector Follow-up Item 2008001-02: Provide more hands-on training for Interim Plant Emergency Directors. The inspectors determined that the interviewed individuals that might serve as Interim Plant Emergency Directors had a working knowledge of the appropriate procedures. This item is now closed.

(Closed) Inspector Follow-up Item 2010004-01: Classification and Notification Matrix did not align with Classifying an Emergency. The inspectors reviewed the procedures for Interim Plant Emergency Directors to assist them in the classification of an event, and provide guidance regarding making the required notifications. The inspectors compared these procedures against those used by the PERMT Plant Emergency Directors and determined that classification and notification guidance was consistent and appropriate. This item is now closed.

10. Exit Meeting Summary

The management organization and control and maintenance and surveillance inspection scope and results were summarized on March 31, 2011 with Ronald Land and members of your staff. The emergency preparedness and operator training inspection scope and results were summarized on April 28, 2011 with Dominique Grandemange and members of your staff. The environmental, radiation waste, and transportation inspection scope and results were summarized on June 9, 2011 with Robert Link and members of your staff. The licensee acknowledged the inspection findings. Proprietary information was discussed but not included in the report.

ATTACHMENT

1. LIST OF PERSONS CONTACTED

Licensee

D. Grandemange, Acting Site Manager
R. Link, Environmental, Health, Safety, and Licensing Manager
T. Tate, Safety, Security & Emergency Preparedness
J. Diest, Emergency Preparedness Manager
L. Hope, Training Manager
B. Ball, Conversion Supervisor
C. Manning, Nuclear Criticality Safety Manager
L. Maas, Licensing Manager
V. Gallacher, Uranium Conversion and Recovery Manager
R. Kimura, Engineering Manager
L. Stevens, Operations Manager
J. Veysey, Maintenance Manager

2. LIST OF ITEMS OPENED, CLOSED, AND DISCUSSED

<u>Item Number</u>	<u>Status</u>	<u>Description</u>
IFI 70- 1257/2008001-02	Closed	Provide more hands-on training for Interim Plant Emergency Directors
IFI 70- 1257/2010004-01	Closed	Classification and Notification Matrix did not align with Classifying an Emergency.
NOV 70- 1257/2011003-001	Opened	The failure of three operators to complete initial qualification, including written exams and skills demonstrations, prior to independently working in the 45 gallon to 55 gallon transfer and storage workstation.

3. INSPECTION PROCEDURES USED

IP 86704	Transportation of Radioactive Material
IP 88005	Management Organization and Control
IP 88010	Operator Training and Retraining
IP 88025	Maintenance and Surveillance
IP 88035	Radioactive Waste Management
IP 88045	Effluent Control and Environmental Protection
IP 88051	Evaluation of Emergency Exercise