



Global Nuclear Fuel

A Joint Venture of GE, Toshiba, & Hitachi

Global Nuclear Fuel

Scott P. Murray

Manager, Licensing & Liabilities

3901 Castle Hayne Road
P.O. Box 780
Wilmington, NC 28402
USA

(910) 819-5950

(910) 362-5950

scott.murray@ge.com

SPM 11-056

October 14, 2011

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555-0001

Attn: Document Control Desk

Subject: 30-day Report of Event – Loss of Mass Control - Used Oil Accumulation

References: 1) NRC License SNM-1097, Docket 70-1113
2) GNF-A Event Report 47269, 9/15/11

Dear Sir or Madam:

In accordance with 10CFR70.50(c)(2), Global Nuclear Fuel – Americas L.L.C. (GNF-A) hereby submits the 30 day follow-up report to Event Notification 47269, which was provided on September 15, 2011 (Reference 2). As discussed in the event report, GNF-A discovered a failure to maintain mass control in the Fuel Manufacturing Operation (FMO) building involving used oil accumulation. Consistent with 10CFR70.50(c)(1), a facsimile was submitted on September 15, 2011 providing additional information and is included as an attachment to this letter.

Additional information is provided as follows:

Event Details and Safety Significance

On September 14, 2011 during a walk-down in the decontamination area, it was discovered from a log entry that an operator had incorrectly processed a can containing used oil with a gross weight in excess of the limit specified by criticality safety requirements. The contents of this favorable geometry 2 ½ gallon can were subsequently processed into a 55 gallon drum. The overweight can resulted in a condition where one of the two controls on mass documented as being necessary to meet double contingency for the 55 gallon used oil storage drum had not been maintained. Nevertheless, the second criticality control on mass was maintained at all times.

The incorrect processing of the used oil can resulted in a loss of an item relied on for safety (IROFS) and as a result, met the reporting requirements of 10CFR70 Appendix A(b)(2).

At no time was an unsafe condition present. The gross weight limit specified by criticality safety requirements to process a can of used oil is 9.58 kg which is the weight of the can and clean oil plus approximately 0.5 kg of other materials. The overweight can of oil improperly transferred into the 55 gallon drum weighed 11.05 kg. Conservatively, if all of the additional weight in this can was uranium, approximately 2 kg of uranium would have been added to the drum which is well below the safe mass limit. Multiple overweight cans would be required to exceed the safe mass limit for the 55 gallon drum. No other overweight cans were added to the drum. The oil in the drum was subsequently sampled and the absence of significant uranium was confirmed.

An extent of condition review identified two additional cans that were improperly processed with a gross weight over the 9.58 kg gross weight limit specified in procedural requirements.

March 2, 2011	9.66 kg
July 13, 2009	9.65 kg

Probable Cause of Event

An investigation determined that the probable causes of the event included:

- The decontamination area oil processing procedures lacked sufficient information to properly process overweight cans. As a result, overweight cans were processed in a manner not addressed by procedures.
- The decontamination area operators lacked a sufficient understanding of the designated IROFS for used oil processing.
- Management oversight was insufficient to identify the prior occurrences.

Immediate Corrective Actions Taken

The decontamination oil processing area was shut down until necessary controls were available.

Complete: September 14, 2011

Near-term Corrective Actions Taken

The decontamination area operators, affected production operators and affected team leaders were provided additional IROFS training on the proper methods and controls for used oil container processing.

Complete: September 20, 2011

Additional IROFS awareness training was provided to affected balance of plant operators.

Complete: September 30, 2011

A temporary operating instruction was issued to clarify used oil disposal requirements and methods to properly process overweight oil cans prior to restarting decontamination area oil processing.
Complete: October 6, 2011

Longer-term Preventive Actions

Enhance the audit program to ensure that operations conform to criticality safety requirements by adding specific checklist items to review during safety audits.

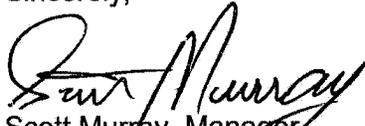
Scheduled complete: January 31, 2012

Modify the decontamination area processing equipment to improve used oil criticality safety controls.

Scheduled complete: February 29, 2012

If you have any questions regarding this matter, please contact me at (910) 819-5950.

Sincerely,



Scott Murray, Manager
Licensing & Liabilities

Attachment 1: Event Description

cc: NRC Region II Administrator, Atlanta, GA
M. Sykes, NRC RII Atlanta. GA
M. L. Thomas, NRC RII Atlanta. GA
M.N (Nick) Baker, NRC NMSS, Washington, DC

Attachment 1

EVENT DESCRIPTION

During a GNF-A Fuel Manufacturing Operation (FMO) Integrated Safety Analysis (ISA) team walk-down of HVAC systems in the decontamination facility area, it was observed that a log entry for a waste-oil can mass was greater than the limit specified in procedural requirements. Upon further investigation it was determined at 3:30PM on September 14, 2011 that an operator had incorrectly processed a waste oil can with a gross weight in excess of the limit specified by criticality safety requirements. This resulted in a condition where one of the two controls on mass documented as being necessary to meet double contingency had not been maintained. The second criticality control on mass was maintained at all times.

At no time was an unsafe condition present, however the decontamination oil processing area was shut down until necessary controls were available.

This event is being conservatively reported pursuant to GNF-A internal procedure reporting requirements within 24 hours of discovery.

Scott Murray
Manager, Licensing and Liabilities
1445 9/15/11

Update to EN 47269

The incorrect processing of the waste oil can as reported on 9/15/11 resulted in a failure to meet the performance requirement of 10CFR70.61 and as a result, also met the reporting requirements of 10CFR70 Appendix A(b)(2).

Scott Murray
Manager, Licensing and Liabilities
1830 9/16/11

Update to EN 47269

An extent of condition review has identified two additional cans that were improperly processed with a gross weight over the 9.58 kg gross weight limit specified in procedural requirements.

March 2, 2011	9.66 kg
July 13, 2009	9.65 kg

At no time was an unsafe condition present. The decontamination oil processing area remains shutdown.

Scott Murray
Manager, Licensing and Liabilities
1100 9/23/11