Global Nuclear Fuel

A Joint Venture of GE, Toshiba, & Hitachi

Global Nuclear Fuel

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SPM 11-065

November 23, 2011

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

Subject: 30-day Report of Event – Three Gallon Can Storage

References: 1) NRC License SNM-1097, Docket 70-1113
2) GNF-A Event Report 47380, 10/27/11

Dear Sir or Madam:

In accordance with 10 CFR 70.50(c)(2), Global Nuclear Fuel–Americas, LLC (GNF-A) hereby submits its 30-day report for Event Notification 47380 that was provided on October 27, 2011 (Reference 2). As discussed in the event report, GNF-A discovered that one of the criticality safety controls for Special Nuclear Material (SNM) movement and storage was not in place. This control is used to control the movement of a specific form of SNM to designated storage locations. Consistent with 10 CFR 70.50(c)(1), a facsimile was submitted on October 27, 2011 providing additional information and is included as an attachment to this letter.

Additional information is provided as follows:

Event Details and Safety Significance

During a routine document review on October 26, 2011, a safety control deficiency was identified for transporting and storing three gallon cans containing a specific (heterogeneous) form of SNM. One of the controls needed to meet double contingency was not available to restrict the movement of cans that exceed the specified mass limit for designated storage locations. This resulted in a condition where the mass control documented in the criticality safety analysis had not been maintained. The second control on geometry remained in place.

At the time of discovery, there were no uranium cans of this particular type in the designated storage locations and no unsafe condition existed.

Probable Cause of Event

An investigation determined the probable cause of the event was:

> For the mass control documented in the criticality safety analysis, the same material type was used but there was a separate limit for heterogeneous material to be stored in specified storage locations. Internal procedures failed to include a separate limit for these locations and there were no instructions to setup a separate material type when there are two different mass limits for the same material type.

Immediate Corrective Actions Taken

The movement of this material type to affected storage locations was suspended.
Complete: October 26, 2011

Short Term Preventive Actions

Revise the system used for mass control prior to restarting material moves to the affected areas.

The Fuel Business System (FBS) was modified to remove all logical moves of heterogeneous material from shop workstations to the designated storage locations. The material types permitted to be stored in these locations has been restricted to homogeneous material only.
Complete: October 27, 2011

Longer Term Preventive Actions

Establish procedure controls for separate material types when multiple conditions exist.
Scheduled completion: January 16, 2012.

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

Sincerely,

Scott Murray

Scott Murray, Manager
Licensing & Liabilities

Attachment: 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

On October 26, 2011 at approximately 3:00PM, a deficiency was identified during a routine criticality safety review of a proposed revision to an operating procedure for transporting and storing 3-gallon cans. One of the controls needed to meet double contingency was not available to restrict the movement of cans that exceed the specified mass limit for these storage locations. This resulted in a condition where the mass control documented in the criticality safety analysis had not been maintained. The second control, geometry, was maintained.

There are no uranium cans of this particular material type currently in these storage locations and no unsafe condition is present. All movement of this material type to these designated storage locations has been suspended.

Additional corrective actions and extent of condition are being evaluated.

This event is being reported pursuant to GNF-A internal procedure reporting requirements due to a loss of double contingency.

Scott Murray
Manager, Licensing and Liabilities
1430 10/27/11