



U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555

DCS-NRC-000311  
14 December 2011

**Subject:** Reply to Notice of Violation

Shaw/AREVA MOX Services' (MOX Services') hereby submits the enclosed response to NRC Inspection Report No. 70-3098/2011-001 and Notice of Violation.

In our response to Violation 70-3098/2011-003-001, MOX Service will be in full compliance on or before 1 June 2012.

If you have any questions, please contact me at (803) 819-2156, or James H. (Jim) O'Dell at (803) 819-2234.

Sincerely,

A handwritten signature in black ink that reads "Kelly D. Trice". The signature is written in a cursive, flowing style.

Kelly D. Trice  
President and COO

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cc:

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EDMS: Corresp\Outgoing\NRC\2011 NRC\DCS-NRC-000311

**Enclosure 1**  
**Reply to a Notice of Violation**

For Violation:  
70-3098/2011-003-001

### **Violation 70-3098/2011-003-001**

Shaw/AREVA MOX Services (MOX Services) does not dispute this violation. Violation 70-3098/2011-003-001 has three examples referred to below as Violations 2011-003-001.1 through 2011-003-001.3. The date when full compliance will be achieved for Violation 2011-003-001 is discussed below following the third example.

#### **The reason for Violation 2011-003-001.1**

The condition occurred due to a failure to properly implement project procedures. The complexity of the tank installations and the required verifications were not fully considered.

#### **The corrective steps that have been taken for Violation 2011-003-001.1**

The condition was entered in MOX Services' corrective action program as CR-11-569.

Tank work packages found to have less than adequate work instructions were revised. A sample of work packages from various disciplines were evaluated during the cause and extent of condition investigation to determine if work instructions need to be revised. The evaluated work packages from other disciplines were found to have adequate work instructions.

#### **The corrective steps that will be taken for Violation 2011-003-001.1 to avoid further violations**

Briefings will be held with Field Engineers and Work Packages Planners to emphasize the importance of developing and issuing work packages with clear and concise work instructions and acceptance criteria in accordance with Project Procedure 11-44. Training will be revised to integrate changes to the template for work package development and changes to PP11-44 Work Package Procedure requirements.

#### **The reason for Violation 2011-003-001.2 and 001.3**

The condition occurred due to a failure to properly implement project procedures which lead to engineering requirements not being adequately flowed down to lower tier documents.

#### **The corrective steps that have been taken for Violation 2011-003-001.2 and 001.3**

These conditions were entered in MOX Services' corrective action program as CRs 11-278, 11-525 and 11-575.

The extent of condition for CR-11-278, determined the hex jam nut installation sequence condition could exist in documentation developed by other groups. Corrective actions included identifying equipment and components that may use hex jam nuts for locking applications and verifying the torquing requirements.

Specifications DSC01-UJF-DS-SPE-L-15010, DSC01-ZMJ-DS-SPE-M-15011, DSC01-ZMJ-DS-SPE-M-65107 have been revised by ECR-013245 to clearly describe the installation sequence for hex jam nuts.

NCR-CE-11-3357 was initiated to disposition equipment which did not conform to DCS01-ZMJ-DS-CAL-M-20639 and DCS01-ZMJ-DS-NTE-N-65107.

Corrective actions for CR-11-525, identified several equipment installation work packages that were possibly missing or using the incorrect project procedures or specifications. Therefore; CR-11-575 was written to review installation drawings, specifications, project procedures and other associated documents to ensure the correct documents are being utilized for installations.

The Welded Equipment Installation Specification, DSC01-UJF-DS-SPE-L-15010, has been revised to incorporate all outstanding ECRs.

**The corrective steps that will be taken for Violation 2011-003-001.2 and 001.3 to avoid further violations**

NCR-EN-11-3517 was initiated to evaluate the 3 tank structure in room C-134 where the jam nuts were installed incorrectly for a thermal expansion application.

Requirements of revised specification DSC01-UJF-DS-SPE-L-15010 will be incorporated into Project Procedure 11-47, Welded Equipment Installation, through a revision or ICN. Differences between Project Procedures; 11-6, 11-47 and Work package 10-CP20-2-KCD-TK-1000-2000M will be evaluated and NCRs will be initiated to ensure that the requirements of the revised Project Procedure 11-47 are satisfied.

Engineering is developing a matrix to identify the applicable specifications, drawings, and procedures Construction will need during installation of equipment. Engineering and Construction will then evaluate the best way to implement the use of the matrix.

**The date when full compliance will be achieved for Violation 2011-003-001**

Full compliance for this violation will be achieved by 1 June 2012