

January 2, 2012
REL:11:052



U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Director, Division of Spent Fuel Storage
and Transportation
Office of Nuclear Material Safety and Safeguards
Washington, D.C. 20555-0001

Gentlemen:

Subject: Report of Non-Compliance with Conditions in Certificate of Compliance 9319, Revision 4 for the Model MAP-12 Licensed Shipping Container; AREVA NP Inc. Richland Facility

Attached please find information as required by 10 CFR 71.95(c) pursuant to AREVA's discovery of shipments made from its Richland fuel fabrication facility that did not fully comply with NRC Certificate of Compliance 9319, Revision 4 for the Model MAP-12 licensed shipping container. Five MAP-12 containers were found, as a result of routine refurbishment inspections, to be missing one or more washers on the inner door latch.

Although these washers are non-safety items, they are called for in three of the license drawings, thus making their absence a violation of the COC for the MAP-12 container. It should be noted that there was no deterioration in the performance of the containers; the door latch nuts and bolts were still securely in place and the latches remained fully operational. As such there was no adverse safety impact associated with these occurrences. The condition has been entered into, and addressed within, AREVA's corrective action program.

If you have questions, please feel free to contact me at 509-375-8409.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Robert Link', with a stylized flourish at the end.

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

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Attachment

Event Information Required by 10 CFR 71.95(c) Relative to Missing Inner Door Latch Washers on MAP-12 Licensed Shipping Containers (NRC COC 9319)

- (1) A brief abstract describing the major occurrences during the event, including all component or system failures that contributed to the event and significant corrective action taken or planned to prevent recurrence.

On November 9, 2011, during routine refurbishment inspections of MAP-12 packagings at AREVA NP's Richland, Washington site, it was discovered that three of the MAP-12s were missing at least one door latch washer. Subsequent inspections of the remaining MAP-12 packagings currently in service (84 packagings) identified two more packagings with at least one door latch washer missing. It should be noted that in all cases where the washer was missing, the nuts were still tight. The missing washers were replaced on all five packagings and they were placed back in service after completion of the rework. The five MAP-12 packagings involved in the issue were from a group of fifteen MAP-12 packagings that were purchased by AREVA Transnuclear (TN) from Columbiana Hi Tech (CHT) at the end of 2010. It appears that the washers have been missing since the packagings were manufactured and the missing washers were not detected in visual inspections performed by CHT, TN, or AREVA NP personnel. The washer in question is a non-safety item but it is shown on license drawings 9045393 Rev. 6, 9045401 Rev. 3, and 9045404 Rev. 3 as Item 63. Two to three shipments were made with each of these packagings while they were in the non-compliant state, see (2)(ii) below.

For discussion of corrective actions resulting from this event, see discussion under (4), below.

- (2) A clear, specific, narrative description of the event that occurred so that knowledgeable readers conversant with the requirements of Part 71, but not familiar with the design of the packaging, can understand the complete event. The narrative description must include the following specific information as appropriate for the particular event.

A narrative of the event was provided under (1), above. NRC Certificate of Compliance (COC) 9319 Revision 4 for the Model MAP-12 and MAP-13 lists license drawings 9045393 Rev. 6, 9045401 Rev. 3, and 9045404 Rev. 3. The three license drawings show the door latch washers in place as Item 63. Since between one to four door latch washers were missing from MAP-12 packagings MP-073, MP-075, MP-076, MP-079, and MP-080 when shipments of enriched fuel assemblies were made using them from AREVA NP's Richland Washington site, these shipments were made in violation of COC 9319.

- (i) Status of components that were inoperable at the start of the event and that contributed to the event;

As described in (1) above, the event involved shipping enriched Type A PWR fuel assemblies in Model MAP-12 packagings with at least one inner door latch washer missing. Despite the missing washers, the inner door latches remained fully operational.

- (ii) Dates and approximate times of occurrences;

Each of the five affected MAP-12 packagings were used to ship PWR fuel assemblies from AREVA NP's Richland, Washington site two to three times during 2011 while in the non-compliant state. The table below summarizes the shipments made with these packagings.

MAP-12	1 st Shipment	2 nd Shipment	3 rd Shipment
MP-073	2/27/11, OCO1-27	8/5/11, TMI1-19	10/5/11, OCO2-26
MP-075	3/5/11, FCA1-27	8/10/11, ANO1-24	10/5/11, OCO2-26
MP-076	3/5/11, FCA1-27	7/29/11, ANO1-24	10/8/11, OCO2-26
MP-079	7/27/11, ANO1-24	8/12/11, ANO1-24	
MP-080	3/7/11, OCO1-27	8/10/11, ANO1-24	10/13/11, SLU1-24

(iii) The cause of each component or system failure or personnel error, if known;

The exact cause is unknown, but appears to be inattention to detail by CHT fabrication and inspection personnel as well as follow-on inattention to detail by inspection personnel at TN and AREVA NP.

(iv) The failure mode, mechanism, and effect of each failed component, if known;

No failed components were involved in this event.

(v) A list of systems or secondary functions that were also affected for failures of components with multiple functions;

There were no component failures associated with this event.

(vi) The method of discovery of each component failure or procedural error.

The missing door latch washers were discovered by AREVA NP personnel during normal packaging refurbishment inspections at the Richland site. It should be noted that the discovery was made by personnel who were looking at these particular MAP-12 packagings for the first time. Previous inspections had been performed by another AREVA NP work group.

(vii) For each human performance-related root cause, a discussion of the causes and circumstances;

The cause by all personnel involved appears to be inattention to detail.

(viii) The manufacturer and model number (or other identification) of each component that failed during the event;

There were no component failures associated with this event.

(ix) For events during the use of a packaging, the quantities and chemical and physical forms(s) of the package contents;

The contents of each package were one or two 14x14 or 15x15 PWR fuel assemblies containing a maximum of 488 kg U of ≤ 5 weight percent ^{235}U solid uranium oxide pellets.

(3) An assessment of the safety consequences and implications of the event. This assessment must include the availability of other systems or components that could have performed the same function as the components and systems that failed during the event.

There were no safety consequences as a result of this event. The inner door latch washers are a non-safety item. The inner door latch nuts and bolts were still securely in place during all shipments.

(4) A description of any corrective actions planned as a result of the event, including the means employed to repair any defects, actions taken to reduce the probability of similar events occurring in the future;

The missing washers were all replaced on the affected packagings. All of the other MAP-12 packagings were inspected to assure that all the door latch washers were in place.

(5) Reference to any previous similar events involving the same packaging that are known to the licensee or certificate holder.

There have been four previous 10 CFR 71.95 reports submitted to the NRC on the MAP-12 package by AREVA NP; the previous reports were dated March 26, 2009; June 26, 2009; November 18, 2009; and September 13, 2010. The first report dealt with making a shipment using a non-compliant ball lock pin. The second report dealt with discrepancies between the MAP-12 fabrication drawings and the license drawings. The third report dealt with shipping a MAP-12 package with a missing ball lock pin. The fourth report dealt with some minor errors in the actual license drawings which had to be revised. These four previous reported events are not considered to be similar to this event, i.e. missing non-safety related container parts due to manufacturing error.

(6) The name and telephone number of the person with the licensee's organization who is knowledgeable about the event and can provide additional information.

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Environmental, Health, Safety, & Licensing
AREVA Richland Fuel Fabrication Plant
(509) 375-8409*

(7) The extent of exposure to individuals to radiation or radioactive materials without identification of individuals by name.

This event did not involve the exposure of individuals to radiation or radioactive materials.