

Meeting Summary January 31, 2012, with Nuclear Fuel Services

PARTICIPANTS

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Also see Enclosure 1.

BACKGROUND

The U.S. Nuclear Regulatory Commission (NRC) issued an Order (Ref. 1) on November 16, 2010. Nuclear Fuel Services (NFS) was required to complete an assessment of its current Corrective Action Program (CAP) against the requirements of Nuclear Quality Assurance (NQA)-1-2008, Part III, Subpart 3.1, "Non-Mandatory Appendix 16A-1 (Ref. 3)." Based on the assessment, NFS would submit a license amendment (LA) request within 9 months of the date of the Order, incorporating into the license its current CAP, including the additional enhancements made to the program as a result of the assessment.

NFS performed the assessment as directed and submitted an application to amend their Special Nuclear Materials License SNM-124 (Ref. 2). During the initial technical review of the LA and the assessment, the staff was unclear how elements of NQA-1 were linked to the LA. The purpose of the meeting was to discuss the linkage.

To prepare for the meeting, the NRC staff requested, and the NFS staff sent, an advance copy of the assessment. The discussion points were the early stages of the draft requests for additional information (RAIs). The NRC staff sent the NFS staff discussion points (Enclosure 2). On January 31, 2012, the NRC and NFS staffs met to discuss Enclosure 2 and the assessment.

INTRODUCTION

The NRC staff began the meeting by making the following points: the purpose of the meeting is to obtain information—statements are not to be taken as commitments in any form, and statements are not to be taken as indications of the NRC staff's findings. A meeting summary would be prepared and placed on the public docket; proprietary or otherwise sensitive information would be redacted and so indicated.

The introductory discussion, given by NFS staff members, was centered around Enclosure 3. Afterwards, the NRC and NFS staffs reconvened to discuss the assessment. The discussion was based on points that had been sent to NFS as Enclosure 3 prior to the meeting.

CAP SOFTWARE SYSTEM

NFS staff described a software system called, "Problem Identification, Resolution, and Correction System (PIRCS)," that is used to keep track of corrective actions. Any employee can enter an issue into the system. Once an issue is entered, the first phase is to screen the issues into personnel matters and procedures/hardware issues. Personal information is redacted for tracking purposes. Minor issues (e.g., light bulb burned out in office hallway) are addressed, but separately from significant issues involving hardware and procedures. Once an issue is entered, only a limited number of NFS staff can modify the entries. The NFS staff then discussed and illustrated the operation of PIRCS.

NRC ORDER

In the LA, NFS commits to a program and lists the elements, along with high-level descriptions of the elements. In this way, NFS has flexibility in changing implementation procedures, such as when needs change or when corrections are seen to be less effective than first thought. Changes are being made in the CAP as necessary, as lessons are learned or enhancements are identified. Placing a detailed description of the CAP in the LA would require numerous amendments, which would be an unnecessary burden for NFS and NRC. Nonetheless, as communicated by the NRC staff, NFS needs to update the key elements of their CAP in the LA to include the discussion point topics, as covered during the meeting.

The Order is at the level of the LA, not the procedures where the CAP is implemented. In complying with the Order, NFS determined the extent to which the LA needed to be changed, and then made changes in the LA. The assessment covers the CAP and the Quality Assurance (QA) program; only the former is addressed by the Order. The CAP is not entirely based on NQA-1. Other (unspecified) guidance was also used.

CAP

The mechanics of the CAP were discussed. An entry is made in PIRCS by an NFS employee. The entry is reviewed to determine its safety significance using risk tables in procedures. An issue is eventually approved to initiate an investigation to determine the root cause using an established procedure and develop corrective actions. Once approved, the corrective actions are implemented. A given issue may be monitored thereafter to determine the effectiveness of the correction. If the corrections are effective, the issue is closed. If the issue is not completely resolved, additional investigations and corrective actions are assigned.

The NRC and NFS staffs discussed each of the points in Enclosure 3. The NRC staff learned that at least some elements of NQA-1 appear to be present in the LA; differences are in terminology between NQA-1 and the QA program. Some key elements of NQA-1 were not clear in the LA and will need to be added for completeness (e.g., management involvement in CAP and follow-up actions). Some ambiguities were because of terminology, which resulted, in part, from the CAP and the QA program residing in separate organizations. Each program evolved for different reasons and purposes. NFS management is in the process of aligning the terminology of the CAP and QA program to the extent that is practical.

The difficulty is that the overseers of each program—namely the Navy for QA and NRC for CAP—use the existing terminology effectively.

FUTURE ACTIONS

NFS will formally submit to the NRC assessment to be placed on the docket.

The NRC staff will submit RAIs, given the January 31, 2012, discussion with NFS.

If substantial changes are made, the NRC staff will have a conference call with NFS to ensure that the RAIs are understood.

REFERENCES

1. Confirmatory Order EA-10-076 Modifying License (effective immediately) NRC Office Of Investigation Report No. 2-2010-001, November 16, 2010. Agencywide Documents and Access Management System (ADAMS) Accession Number ML103210213.
2. Letter from Mark P. Elliott, NFS, "Request to Amend SNM-124 Regarding Corrective Action Program to Fulfill Confirmatory Order, Section V, Paragraph 6 (EA-1 0-076)," August 5, 2011. ADAMS Accession Number ML11228A082.
3. The American Society of Mechanical Engineers, "Quality Assurance Requirements for Nuclear Facility Applications (Revision of ASME NQA-1-2004)," ASME NQA-1-2008, March 14, 2008.