UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
245 PEACHTREE CENTER AVENUE NE, SUITE 1200
ATLANTA, GEORGIA 30303-1257

May 8, 2011

Mr. Robert Van Namen
Senior Vice President, Uranium Enrichment
United States Enrichment Corporation
Two Democracy Center
6903 Rockledge Drive
Bethesda, MD 20817

SUBJECT: PADUCAH GASEOUS DIFFUSION PLANT - NRC INTEGRATED INSPECTION REPORT NO. 70-7001/2012-002 AND TEMPORARY INSTRUCTION 2600/015 INSPECTOIN REPORT NO. 070-07001/2011-006

Dear Mr. Van Namen:

This document refers to the inspection conducted from January 1 through March 31, 2012, at the United States Enrichment Corporation Paducah Gaseous Diffusion Plant (PGDP) in Paducah, Kentucky. The purpose of this inspection was to determine whether activities authorized under the certificate were conducted safely and in accordance with Nuclear Regulatory Commission (NRC) requirements. The enclosed report presents the results of this inspection. The findings were discussed with members of your staff at exit meetings held on February 9, March 16, and at the end of the quarter on April 11, 2012.

During this inspection, the NRC staff examined activities conducted under your certificate as they related to public health and safety and to confirm compliance with the Commission's rules and regulations, and with the conditions of your certificate. Areas examined during the inspections are identified in the enclosed report. Within these areas, the inspections consisted of selected examinations of procedures and representative records, observations of activities, and interviews with personnel.

Based on the results of these inspections, no cited violations or deviations were identified.

This document also refers to the inspection conducted from December 5 through 8, 2011, under Temporary Instruction (TI) 2600/015, "EVALUATION OF LICENSEE STRATEGIES FOR THE PREVENTION AND/OR MITIGATION OF EMERGENCIES AT FUEL FACILITIES." The findings from this inspection were discussed with Vernon Shanks and members of your staff at an exit meeting held on December 8, 2011.

In accordance with Title 10 of the Code of Federal Regulations (10 CFR) Section 2.390 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be made available electronically for public inspection in the NRC Public Document Room or from the NRC's document system (ADAMS), accessible from the NRC Web site at http://www.nrc.gov/reading-rm/adams.html.

Should you have any questions concerning this inspection, please contact us.

Sincerely,

/RA/

Joselito O. Calle, Chief
Fuel Facility Inspection Branch 2
Division of Fuel Facility Inspection

Docket No. 70-7001
Certificate No. GDP-1

Enclosure:
NRC Inspection Report No. 70-7001/2012-002
w/Attachment: Supplementary Information

cc w/encl: (See page 3)

Should you have any questions concerning this inspection, please contact us.

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/RA/

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cc w/encl: (See page 3)

☐ PUBLICLY AVAILABLE ☐ NON-PUBLICLY AVAILABLE ☐ SENSITIVE ☐ NON-SENSITIVE
ADAMS: ☐ Yes ACCESSION NUMBER: ML12131A437 ☐ SUNSI REVIEW COMPLETE ☐ FORM 665 ATTACHED

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NAME	RRussell	PGlenn	MToth	JFoster	MChitty	OLopez	TMarenchin
DATE	4/20/2012	4/23/2012	4/23/2012	4/26/2012	4/26/2012	4/19/2012	4/26/2012
E-MAIL COPY?	YES	YES	YES	YES	YES	YES	YES

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Letter to Mr. Robert Van Namen from Joselito O. Calle dated May 8, 2012

SUBJECT: PADUCAH GASEOUS DIFFUSION PLANT - NRC INTEGRATED INSPECTION REPORT NO. 70-7001/2012-002

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U. S. NUCLEAR REGULATORY COMMISSION
REGION II

Docket No.:	70-7001
Certificate No.:	GDP-1
Report No.:	70-7001/2012-002
Certificate Holder:	United States Enrichment Corporation
Facility:	Paducah Gaseous Diffusion Plant
Location:	Kevil, KY 42053
Dates:	January 1 through March 31, 2012 December 5 through December 8, 2011
Inspectors:	M. Chitty, Senior Resident Inspector R. Russell, Resident Inspector J. Foster, Fuel Facility Inspector M. Toth, Fuel Facility Inspector P. Glenn, Fuel Facility Inspector O. Lopez, Senior Fuel Facility Inspector T. Marenchin, Criticality Safety Inspector J. Marcano, Structural Engineer
Approved by:	J. Calle, Chief Fuel Facility Inspection Branch 2 Division of Fuel Facility Inspection

Enclosure

EXECUTIVE SUMMARY

United States Enrichment Corporation, Paducah Gaseous Diffusion Plant
NRC Integrated Inspection Report 70-7001/2012-002
January 1 – March 31, 2012

Safety Operations

- The inspectors evaluated the adequacy of the certificate holder's response to significant plant issues as well as their approach to solving various plant problems. One unresolved issue related to crane operations was identified following two separate incidents when the bridge portion of a crane carrying cylinders filled with liquid uranium hexafluoride struck a building door. (Paragraph A.1)

Facility Support

- The inspectors reviewed the adequacy of the certificate holder's configuration control program and determined that it was being adequately implemented. (Paragraph B.1)

- The inspectors observed maintenance work activities on selected systems, equipment, and processes and determined that work activities were conducted in accordance with the certificate holder's requirements and approved procedures. Adverse conditions related to the maintenance and surveillance program were sufficiently identified and tracked to completion. (Paragraph B.2)

- The inspectors reviewed the certificate holder's management organization and control program including control of procedures, corrective actions, and internal audits and determined that it was being implemented in accordance with the certificate and regulatory requirements. (Paragraph B.3)

- The inspectors reviewed the Operator Training program and evaluated the program against the certificate. The training program was implemented in accordance with the certificate and regulatory requirements. (Paragraph B.4)

Special Topics

- The inspectors' review of the applicability of regulatory requirements for possession and leak testing of the process gas leak detectors continues, and Unresolved Item 70-7001/2011-004-01 remains open. (Paragraph C.1)

- The inspectors evaluated the strategies and procedures used to mitigate the consequences of safety/licensing basis events and reviewed the adequacy of emergency procedures for dealing with the consequences of beyond safety/licensing basis events. The inspectors determined that emergency equipment and procedures needed to mitigate the consequences for selected beyond design safety basis events should remain available and functional. (Paragraph C.2)

Attachment

Key Points of Contact
List of Items Opened, Closed, and Discussed
Inspection Procedures Used

REPORT DETAILS

Summary of Plant Status

The certificate holder performed routine operations and maintenance throughout the inspection period. During the inspection period, the facility maintained plant load and assay levels according to the production schedule.

A. Plant Operations (Inspection Procedure (IP) 88100)

a. Inspection Scope and Observations

The inspectors performed daily tours of plant operating areas housing special nuclear materials (SNM) and determined that equipment and systems were operated safely and in compliance with the certificate. Daily operational meetings and turnover meetings were observed throughout the period where production status and operational issues were discussed. The inspectors reviewed selected certificate holder identified events and corrective actions for previously identified events. The inspectors focused on plant operations and safety related equipment (i.e. valves, sensors, instrumentation, in-line monitors, scales, etc.).

The daily tours included walk-downs of the central control facility, process buildings, the purge and product building, the surge and waste building, the toll transfer and sampling building, and both of the feed vaporization facilities. The inspectors toured portions of the cascade and uranium hexafluoride (UF_6) handling areas. The inspectors verified that there was adequate staffing and that operators were attentive to their duties and the status of alarms and annunciators.

The inspectors observed activities during normal and upset conditions for compliance with procedures and technical specifications. The inspectors noted that safety systems were in place to ensure proper control of SNM. The inspectors verified the adequacy of communications between supervisors and operators within the operating areas. The inspectors walked down portions of safety-significant operating systems. The inspectors reviewed log books, lockout/tagout records, and temporary modifications to obtain information concerning operating trends and activities. The inspectors conducted interviews with building managers, first line supervisors, operators, and operator trainees regarding safety training and procedures for handling safety issues.

The inspectors performed periodic tours of outlying facility areas during the inspection period and determined that equipment and systems were operated safely and in compliance with the certificate. The focus of these tours centered on the evaluation of potential hazards and protection features, combustible material storage and fire loading, hazardous chemical storage, storage of compressed gas containers, potential degradation of plant security features, and potential fire hazards. During these tours, the inspectors also verified that required notices to workers were appropriately and conspicuously posted in accordance with 10 CFR 19.11 and 10 CFR 21.6.

The inspectors confirmed that system operability matched the status as reflected in the certificate holder's computer tracking system, iPlant. The inspectors also assessed the operability of selected safety equipment by reviewing the lockout-tagout sheets for selected systems. The inspectors verified that tagged components were in the required positions and that systems were configured properly when returned to service.

During area tours, the inspectors verified various nuclear criticality controls to be in place, that nuclear criticality safety instruments were operable, and that criticality detection and alarm equipment was available as required by Technical Specification Requirements (TSRs). The inspectors also audited the performance of periodic surveillances required by TSRs and other procedures to determine that criticality controls were operable and that they complied with requirements.

During the inspection period, the inspectors conducted fire safety tours of various areas to verify that transient combustibles were being adequately controlled and minimized. The inspectors walked down various fire suppression components and systems that supplied the areas and verified these systems were properly aligned and operational. The inspectors verified that various aspects of the fire protection/prevention strategies conformed to the applicable nuclear criticality safety evaluation.

During tours of the cascade, the various process buildings, and facility support areas, inspectors observed radiation protection controls and practices implemented during plant activities including: the proper use of personnel monitoring equipment; required protective clothing; and, frisking methods for detecting radioactive contamination on individuals exiting contamination controlled areas.

The inspectors noted that plant workers properly wore dosimetry and used protective clothing in accordance with applicable Radiation Work Permits (RWPs). The inspectors also noted that radiation area postings complied with plant procedures and included radiation maps with up-to-date radiation levels. The inspectors monitored the operation of radiation protection instruments and reviewed the calibration due dates of those instruments.

The inspectors reviewed RWPs to determine if they contained sufficient detail and were adequately implemented in order to ensure personnel exposure was maintained as low as reasonably achievable (ALARA).

The inspectors attended various plan-of-the-day meetings throughout the inspection period in order to determine the overall status of the plant. The inspectors evaluated the adequacy of the certificate holder's response to significant plant issues as well as their approach to solving various plant problems.

The inspectors reviewed two self-revealing incidents involving the operation of UF_6 liquid handling cranes in the C-360 Toll, Transfer, and Sampling building. On December 18, 2011 and again on February 7, 2012, operators struck the crane door while the crane they were operating was carrying a cylinder containing liquid UF_6. In each incident, the bridge portion of the crane made contact with an upper door that the bridge portion of the crane had to pass through as it moved from inside the building into a cylinder yard located on the outside of the building. In each instance, damage was restricted to the doors. The contact did not result in dropping a cylinder or in the cylinder making contact with any other surface.

Although neither of the incidents resulted in a dropped cylinder, the dropping and subsequent rupture of a liquid UF_6 cylinder as analyzed in the certificate under a worst case scenario, could result in off-site exposures that exceed the Evaluation Basis Event Evaluation Guideline for uranium. Because the inspectors required further information

from the certificate holder and additional guidance to determine if the performance deficiency was more than minor, this issue is identified as unresolved item, URI 70-7001/2012-002-01, "Failure to Ensure Clear Path While Moving Liquid UF_6 Cylinders."

b. Conclusion

One unresolved issue was identified related to a failure of operators to ensure a clear path while moving a liquid UF_6 cylinder.

B. Facility Support

1. Configuration Control (IP 88101)

a. Inspection Scope and Observations

The inspectors reviewed the adequacy and implementation of the facility's configuration control program. As part of this review, the inspectors reviewed modifications to replace actuators on autoclave steam condensate containment isolation valves. The inspectors determined that the certificate holder adequately implemented the configuration control program.

b. Conclusion

No findings of significance were identified.

2. Maintenance & Surveillance (IPs 88102, 88103 and 88025)

a. Inspection Scope and Observations

The inspectors performed detailed reviews of several work requests (WRs) involving safety-related equipment (Q, AQ, and AQ-NCS). The inspectors reviewed the WRs for proper identification of safety-related equipment and inclusion of post maintenance TSR surveillance testing. The inspectors also evaluated the WRs for compliance with applicable procedures.

The inspectors verified that the certificate holder's work control program had provisions to ensure adequate pre-job planning and preparation of work packages to support maintenance and surveillance activities. The inspectors reviewed several maintenance and surveillance work packages for accuracy and that test packages challenged and verified the operability of safety controls.

The inspectors observed a variety of maintenance and surveillance activities in the field, including annual surveillances, safety related equipment repairs, preventative maintenance, post-maintenance testing, equipment calibration, and corrective maintenance. The inspectors also observed daily maintenance and operation's plan-of-the-day meetings.

During the observation of surveillance activities, the inspectors verified that: activities were performed safely; testing was performed in accordance with procedures; and, measuring and test equipment was within calibration due dates. The inspectors verified that: TSR Limiting Conditions for Operation (LCOs) were entered when appropriate;

removal and restoration of affected components was properly accomplished; test and acceptance criteria conformed to TSRs and the Safety Analysis Report (SAR); and, deficiencies or out-of-tolerance values identified during the testing were documented, reviewed, and resolved by appropriate management personnel.

The inspectors observed maintenance work activities on selected systems, equipment, and processes and determined that work activities were conducted in accordance with the certificate holder's requirements and approved procedures. Effective corrective actions were taken when a safety control failed or was degraded. The inspectors verified that post-maintenance testing and calibrations were adequately performed prior to restoring equipment to operational status and that completed work packages were also adequately reviewed prior to returning equipment to service.

The inspectors interviewed the maintenance manager, supporting supervisors, building managers, front line supervisors, and the scheduling manager to verify that maintenance and surveillance program activities performed on safety significant systems and components were adequate to assure that the controls were available and reliable to perform their safety function when needed. The inspectors determined that adverse conditions related to the maintenance and surveillance program were sufficiently identified and tracked to completion.

b. Conclusion

No findings of significance were identified.

3. Management Organization and Controls (IPs 88105 and 88005)

a. Inspection Scope and Observations

The inspectors performed daily reviews of the certificate holder's ATR entries to ensure that items adverse to requirements and safety were being identified and tracked to closure. The inspectors verified that issues were being properly identified, reviewed and tracked to completion.

The inspectors reviewed management organization changes since the last inspection and noted that a new Nuclear Safety & Quality Manager had been announced prior to the retirement of the current manager. The inspectors noted that the transition was adequate. The inspectors interviewed the new manager and determined that he was knowledgeable of his functions and responsibilities. The inspectors also reviewed the qualifications of the new manager.

The inspectors interviewed two senior managers to verify that the management team contained an understanding of the plant policy for safety and management responsibilities as defined in the certificate. The inspectors reviewed changes in personnel that occurred within the past year. The inspectors verified that the personnel selected met the qualifications as required by the certificate. Through interviews, the inspectors verified that the newly appointed individuals were aware of their assigned responsibilities and functions.

The inspectors verified the certificate holder's control of procedures through a review of records. The inspectors reviewed a selection of procedures which had been changed during the past year to ensure that they were reviewed and approved in accordance with the certificate holder's change process.

The inspectors reviewed the certificate holder's problem identification and resolution program to determine if the program was being conducted in accordance with approved procedures and the certificate. The inspectors observed a management meeting where safety significance and categorization were determined for issues in the corrective action program. The inspectors reviewed recent event and incident investigations conducted by the certificate holder and determined that the incident report, root cause determination, and corrective action determination were adequate.

The inspectors reviewed a sample of internal audits for the Environmental and UF_6 handling programs and determined that the audits identified findings which were subsequently entered into the corrective action program. The inspectors reviewed the annual audit schedule through 2013 and determined the certificate holder had scheduled audits at the frequency required in the certificate.

The inspectors reviewed safety committee meeting minutes and attendance records, attended a safety committee meeting and verified that the committee was operating per the certificate and implementing procedures. The inspectors determined that the management organization and control program was implemented in accordance with the certificate and regulatory requirements.

b. Conclusion

No findings of significance were identified.

4. Operator Training (IP 88010)

a. Inspection Scope and Observations

The inspectors reviewed the Operator Training program and evaluated the program against the certificate. The inspectors interviewed the certificate holder regarding changes to the training program in the past year and determined that no significant changes were made. The inspectors also determined that there were no applicable procedure revisions regarding the implementation of the training program in the past year. The inspectors reviewed the procedure implementing the certificate holder's systematic approach to training and determined that the program was established, implemented, and maintained as required by 10 CFR 76.95.

The inspectors discussed and observed training with selected staff in a variety of positions. The inspectors observed classroom training for the Nuclear Criticality Safety and Cascade Operation areas. The inspectors interviewed class participants on the content of the training material and determined that the material was presented at the appropriate level and met the training objectives.

The inspectors reviewed three examinations which had been revised in the past year. The inspectors determined that the examination revisions did not decrease the amount of challenge or the inclusion of the course objectives. The inspectors determined that

trainee understanding and the command of learning objectives were evaluated as required by the certificate. The inspectors reviewed the Radiological Worker Training and Radiological Worker Refresher lesson plans and determined that the training classes included the requirements in 10 CFR 19.12. The inspectors determined that the training program was implemented in accordance with the certificate and regulatory requirements.

b. Conclusion

No findings of significance were identified.

C. Special Topics

1. URI 70-7001/2011-004-01 - Process Gas Leak Detector (PGLD) General License Requirements

a. Inspection Scope and Observations

The certificate-holder had in its possession over 4,000 process gas leak detectors and each one contained 80 µCuries of Americium-241. The labels on these devices described general license requirements and requirements for labeling, leak testing, repairing, transfer, and disposal. The certificate-holder had not disclosed possession of these devices in the initial *Certificate Application and Request for Materials Authorization* to the NRC. The inspectors' review of the applicability of regulatory requirements for possession and leak testing of the detectors continues, and this unresolved item remains open.

b. Conclusion

No findings of significance were identified.

2. TI-2600/015 Inspection – Evaluation of Certificate Holder Strategies for the Prevention and/or Mitigation of Emergencies at Fuel Facilities

a. Inspection Scope and Observations

The objective of this inspection was to evaluate the strategies and procedures used by the certificate holder to prevent and mitigate the consequences of safety/licensing basis events and beyond safety/licensing basis events. The inspectors evaluated the certificate basis for accident sequences and consequences associated with natural phenomena hazards. Specifically, the inspectors evaluated the following hazards; earthquakes, high winds, flooding, and extended loss of power.

The inspectors noted that the SAR stated that the plant was not designed in accordance with any NRC required design basis criteria because, in the early 1950s when the facility was constructed, there were no regulatory based design basis criteria for natural phenomena (i.e., earthquakes, winds, or floods) other than the standard building codes of the time. Since the facility was not designed and constructed to meet defined design basis events, evaluation basis events were subsequently defined and used to certify the facility. The inspectors determined that process building design specifications were consistent with assumptions used in the postulated accident sequences related to

natural phenomena events. The inspectors then determined that the engineered features of the various process buildings were consistent with specifications and assumptions in the accident scenarios.

The inspectors evaluated the strategies and emergency procedures for preventing or mitigating the consequences of safety/licensing basis events. The inspectors verified that procedures, personnel, and equipment credited in the certificate holder's mitigation strategy for each of the licensing basis events were properly implemented. The inspectors verified that personnel had been trained on the procedures and equipment referenced in the procedures. The inspectors noted that part of the emergency response training included sessions on techniques for dealing with multiple and concurrent severe events and developing effective mitigating strategies.

The inspectors also noted that the certificate holder routinely provided training to the local community in how to respond to chemical release emergencies. The inspectors also verified that agreements with local response organizations were in place and were capable of meeting the conditions needed to mitigate the consequences of natural phenomena hazards (NPH) events. The inspectors verified that cranes handling liquid UF_6 cylinders were seismically qualified and would not drop a cylinder upon a loss of power. The inspectors performed similar verifications for UF_6 processing and containment isolation systems.

The inspectors also reviewed crane surveys and maintenance documents to verify that the certificate holder was conducting required crane maintenance. The inspectors noted a modification to the C-333A building crane was not based on the approved peak ground acceleration (PGA), but was based on an older design criteria characterized by a lower magnitude of PGA. The certificate holder removed the crane from service until an evaluation could be performed. The issue was entered into the CAP under ATR-11-3250, "C333-A East Whiting Crane Seismic Design."

By the time the inspectors conducted their exit meeting, the certificate holder had completed their seismic analysis of the crane with the current PGA data and concluded that the seismic demand/capacity design ratios of the crane remained within acceptable limits. The certificate holder documented the revised calculations in design calculation, DAC-815-ZB3240-0001, rev. 2. The inspectors reviewed the corrective actions associated with ATR-11-3250 and found them to be adequate.

The inspectors reviewed the three types of seismic detection systems that were in place on site and determined that they were sufficient for rapid identification of significant seismic events.

The inspectors reviewed report, KY/N-007, "Assessment Report for Paducah Gaseous Diffusion Plant Analysis, Review and Response of the Fukushima Daiichi Nuclear Station Earthquake and Tsunami," rev. 0. The purpose of the review was to verify that normal and backup systems, credited as important-to-safety for preventing or mitigating the impact of events similar to Fukushima, were in place at the PGDP. The inspectors noted that the assessment identified items for improvement along with corrective actions taken or planned to address those items.

The inspectors determined that procedures and strategies credited by the certificate holder for responding to NPH events were adequate to prevent or mitigate the accident's consequences.

The inspectors performed an evaluation of the licensing basis for accident sequences and consequences associated with natural phenomena hazards. The inspectors selected a sample of beyond safety/licensing basis events in addition to postulating some of their own. They reviewed a selection of events based on the certificate holder's safety analysis, engineering analyses and safety/licensing information. Postulated events included: a seismic event with a large fire and no automatic fire protection available; a seismic event involving multiple hazardous chemical releases; and, a criticality accident where the criticality accident alarm system was not available.

After reviewing documents and conducting interviews, the inspectors determined that the likely consequences of the beyond safety/licensing basis events were bounded by the analyzed accident sequences and consequences, i.e., the consequences and associated actions for UF_6 release during a severe seismic event were not appreciably different from the safety basis accident involving the rupture of a UF_6 cylinder. For each of the postulated and selected beyond safety/licensing basis events, the inspectors evaluated whether:

- emergency equipment needed to prevent and/or mitigate the consequences would be available and functional;
- existing procedures would be sufficient to prevent and/or mitigate the consequences;
- training and qualifications of operators, on-site emergency response personnel, and support staff needed to implement procedures for the selected beyond safety/licensing basis events was adequate; and,
- requirements or commitments for offsite support or assistance, including agreements and contracts would be sufficient to address the consequences.

The inspectors determined that emergency equipment and procedures needed to mitigate the consequences for selected beyond design safety basis events should remain available and functional.

b. Conclusion

No findings of significance were identified.

D. Exit Meeting

The inspection scope and results were presented to members of the certificate holder's staff at various meetings throughout the inspection period and were summarized on April 11 to Jim Lewis and staff. No dissenting comments were received from the certificate holder. Proprietary information was discussed but not included in the report.

SUPPLEMENTARY INFORMATION

1. KEY POINTS OF CONTACT

Name	Title
K. Ahern	Production Support Manager
P. Beane	Nuclear Safety and Quality Manager (retired)
M. Boren	Regulatory Compliance and Nuclear Safety Manager
M. Buckner	Plant Manager
D. Clayton	Training Manager
D. English	Nuclear Safety and Quality Manager
S. Germain	Scheduling Manager
S. Gunn	Operations Manager
T. Henson	Nuclear Criticality Safety Manager
O. Hickman	Health Physics Manager
J. Lewis	General Manager
S. McKinney	Engineering Manager
V. Shanks	Regulatory Affairs Manager
D. Snow	Environmental Safety and Health Manager
C. Willett	Maintenance Manager

2. LIST OF ITEMS OPENED, CLOSED, AND DISCUSSED

Opened

70-7001/2012-002-01 URI Failure to Ensure Clear Path While Moving Liquid UF_6 Cylinders

Opened & Closed

None

Closed

None

Discussed

URI Process Gas Leak Detector General License Requirements

3. INSPECTION PROCEDURES USED

88005	Management Organization and Controls
88010	Operator Training
88025	Maintenance and Surveillance of Safety Controls
88100	Plant Operations
88101	Configuration Control
88102	Surveillance Operations
88103	Maintenance Operations
88105	Management Organization and Controls
TI 2600/015	Evaluation of Certificate Holder Strategies for the Prevention and/or Mitigation of Emergencies at Fuel Facilities