

JUL 20 2012

LES-12-00100-NRC

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

Louisiana Energy Services, LLC
NRC Docket No. 70-3103

Subject: 10 CFR 71.95 Report on Certificate of Compliance Bolt Plug

In accordance with 10 CFR 71.95(a)(3), Louisiana Energy Services, LLC (dba "UUSA") submits this report (Enclosure) for discovery of a condition in which the conditions of approval in the Certificate of Compliance were not observed in making a shipment involving an NRC-approved UX-30 transportation package.

Should there be any questions concerning this report, please contact Perry Robinson (Acting Licensing Manager), URENCO USA (UUSA), at 575-394-6598.

Respectfully,



Russell Williams for
Jay Laughlin
Chief Nuclear Officer and Head of Technical services

Enclosure: Certificate of Compliance Not Observed

W145501

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ENCLOSURE

Certificate of Compliance Not Observed

Certificate of Compliance Not Observed

ABSTRACT

On June 14, 2012 Westinghouse notified UUSA that product cylinders received in UX-30 over packs did not have plug bolts installed in the lid lifting lugs. This condition was not in accordance with the Certificate of Compliance and the Safety Analysis Report. The UUSA procedure for container handling correctly specified the installation of the plug bolts. Training and procedure changes were implemented to avoid future errors.

DETAILS AND INVESTIGATION RESULTS

On June 14, 2012 at approximately 10:32 AM MDT following the first shipment of six 30B product cylinders to Westinghouse Electric Company, Hopkins, SC, UUSA received notification from the Westinghouse Lead Transport Specialist that the UX-30 protective shipping packages (overpacks) lid lifting lugs did not have bolt plugs installed to disable their use during loading and unloading operations. The UX-30 protective shipping package Certificate of Compliance requires the user to follow the instruction contained in Chapter 7 of the UX-30 Safety Analysis Report (SAR). Specifically, section 7.1.2.17 of the SAR, states, "Install the bolt plugs in the optional lid lifting lugs as shown in the General Arrangement Drawings, Appendix 1.4.1." Step 8.2.17 of UUSA procedure LO-3-2000-04, *Container Handling During Initial Plant Start-Up* contains this same requirement. This step in the procedure was not followed prior to shipment of the product cylinders.

The cause of this event is human error, failure to follow procedure with a contributing cause being an inadequate checklist. LO-3-2000-4, *Container Handling during Initial Plant Start-Up*, step 8.2.17, "Install bolt plugs in lid lifting lugs" clearly directs container handlers to perform this task. Step 8.2.34, requires "Inspect outbound vehicle using LO-3-2000-04-F-1, *Vehicle/Shipment Inspection Checklist*." This checklist did not include the verification of proper placement of bolt plugs.

SAFETY CONSEQUENCES

An assessment of the safety consequences and implications of the event were discussed with the Certificate of Compliance holder, and this condition was determined to have no safety significance. The plugs represent a defense in depth, disallowing use of the lifting lugs when the UX-30 containing a cylinder is loaded or unloaded. No exposure of individuals to radiation or to radioactive materials resulted from this event. There were no component failures associated with this incident. The quantities and chemical and physical form(s) of the package contents were approximately 2235 Kg solid UF6 per cylinder.

CORRECTIVE ACTIONS

On June 19, 2012 the container handling team was briefed on the importance of procedure adherence.

A work flow check was implemented for the next shipment. This included the following activities in addition to routine steps: 1) an additional working copy of the procedure was provided to container handlers conducting activities removed from the primary work such that each step could be verified as the work evolution progressed; 2) Each step of the procedure was initiated when completed; 3) a peer check of shipment configuration was performed after completion of the cylinder loading; and 4) Supervisor observed work evolution.

Procedure LO-3-2000-4, *Container Handling during Initial Plant Start-Up*, was revised and issued on June 21, 2012 to include verification of bolt plug installation as part of the inspection checklist.

SIMILAR EVENTS

LES-12-00088-NRC was submitted on June 21, 2012. This was a 10 CFR 71.95 60 day event report. The event was that AREVA received product cylinders in UX-30 over packs that had a valve cover installed on the cylinder valve. Three shipments of UF₆ 30B product cylinders were made in UX-30 overpacks with valve covers not removed in accordance with the Certificate of Compliance and the Safety Analysis Report. The UUSA procedure for container handling did not specify the removal of the valve cover prior to shipping. Valve covers are now removed prior to shipment and the procedure has been corrected.