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

July 27, 2012

Mr. B. J. Burch
General Manager
Babcock and Wilcox
Nuclear Operations Group, Inc.
P.O. Box 785
Lynchburg, VA 24505-0785

SUBJECT: BABCOCK AND WILCOX NUCLEAR OPERATIONS GROUP, INC. - NRC INTEGRATED INSPECTION REPORT NO. 70-27/2012-003 AND NOTICE OF VIOLATION

Dear Mr. Burch:

This refers to the inspection conducted from April 1 to June 30, 2012, at the Babcock and Wilcox (B&W) Nuclear Operations Group (NOG), Inc. facility in Lynchburg, VA. The purpose of this inspection was to determine whether activities authorized under the license 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 you and members of your staff on June 29, 2012.

During this inspection, the NRC staff examined activities conducted under your license 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 license. Areas examined during the inspections are identified in the enclosed report. Within these areas, the inspections consisted of selected examination of procedures and representative records, observations of activities, and interviews with personnel.

Based on the results of this inspection, the NRC has determined that one Severity Level IV violation of NRC requirements occurred. The violation was evaluated in accordance with the NRC Enforcement Policy. The current Enforcement Policy is included on the NRC's Web site at (http://www.nrc.gov/about-nrc/regulatory/enforcement/enforce-pol.html).

The violation is cited in the enclosed Notice of Violation (Notice) and the circumstances surrounding it are described in detail in the subject inspection report. The violation is being cited in the Notice because it is considered self-revealing and was not identified by the licensee.

The NRC has concluded that information regarding the reason for the violation, the corrective actions taken and planned to correct the violation and to prevent reoccurrence and the date when full compliance will be achieved are already adequately addressed on the docket in

the enclosed inspection report. Therefore, you are not required to respond to this letter unless the description herein does not accurately reflect your corrective actions or position. In that case, if you chose to provide additional information, you should follow the instructions specified in the enclosed Notice.

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, enclosure, and your response, if you choose to provide one, 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. To the extent possible, your response should not include any personal privacy, proprietary, or safeguards information so that it can be made available to the public without redaction.

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

Sincerely,

/RA/

Alan J. Blamey, Chief
Fuel Facility Inspection Branch 1
Division of Fuel Facility Inspection

Docket No. 70-27
License No. SNM-42

Enclosures:
1. Notice of Violation
2. NRC Inspection Report No. 70-27/2012-003
   w/attachment

cc w/encl:
C. A. England, Manager
Licensing and Safety Analysis
Babcock and Wilcox
Nuclear Operations Group, Inc.
P.O. Box 785
Lynchburg, VA 24505-0785

Steve Harrison, Director
Division of Radiological Health
Department of Health
109 Governor Street, Room 730
Richmond, VA 23219

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X PUBLICLY AVAILABLE ☐ NON-PUBLICLY AVAILABLE ☐ SENSITIVE X NON-SENSITIVE

ADAMS: X Yes ACCESSION NUMBER ML12209A261 X SUNSI REVIEW COMPLETE X FORM 665 ATTACHED

OFFICE	RII: DFFI	RII: DFFI	RII: DFFI				
SIGNATURE	Via e-mail	Via email	/RA/				
NAME	SSubosits	MChitty	DHartland				
DATE	7/19/2012	7/19/2012	7/18/2012	7/ /2012	7/ /2012	7/ /2012	7/ /2012
E-MAIL COPY?	YES NO	YES NO	YES NO	YES NO	YES NO	YES NO	YES NO

OFFICIAL RECORD COPY DOCUMENT NAME: G:\DFFI\REPORTS\DRAFT INSPECTION REPORT FOLDER\B&W NOG\BW NOG IR 2012-003 PUBLIC REV 1.DOCX

Letter to Mr. B. J. Burch from Alan J. Blamey dated July 27, 2012

SUBJECT: BABCOCK AND WILCOX NUCLEAR OPERATIONS GROUP, INC. - NRC INTEGRATED INSPECTION REPORT NO. 70-27/2012-003 AND NOTICE OF VIOLATION

Distribution w/encls:
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R. Johnson, NMSS
S. Subosits, RII
M. Baker, NMSS
K. Ramsey, NMSS

NOTICE OF VIOLATION

B&W NOG
Lynchburg, VA

Docket No. 70-27
License No. SNM-42

During an NRC inspection conducted from April 1 to June 30, 2012, a violation of NRC requirements was identified. In accordance with the NRC Enforcement Policy, the violation is listed below:

> Safety Condition S-1 of NRC license SNM-42 authorizes the use of nuclear materials in accordance with Chapters 1 through 11 of the License Application submitted on March 31, 2011, and supplements thereto.
>
> Section 11.4 of the License Application requires, in part, that activities at B&W NOG involving licensed material shall be performed in accordance with written and approved procedures.
>
> Section G, of OP- 1034221, "Recovery Disassembly Machining," Revision 0, requires, in part, the operator only remove as much material as can be done safely in a single machine pass.
>
> Contrary to the above, on May 22, 2012, a machine operator removed more material than could be done safely in a single machine pass during a component disassembly operation. As a result of the action, the operator breached a special nuclear material bearing component that resulted in the spread of radioactive contamination to the operator and the work area.

This is a Severity Level IV violation (Section 6.2).

The NRC has concluded that information regarding the reason for the violation, the corrective actions taken and planned to correct the violation and prevent recurrence, and the date when full compliance will be achieved, are already adequately addressed on the docket in the enclosed inspection report. However, you are required to submit a written statement or explanation pursuant to 10 CFR 2.21 if the description therein does not accurately reflect your corrective actions or your position. In that case, if you choose to response, clearly mark your response as a "Reply to a Notice of Violation," and send it to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555-0001 with a copy to the Regional Administrator Region II, and a copy to the NRC Senior Resident Inspector, Stephen Subosits, at the B&W NOG facility, within 30 days of the date of the letter transmitting this Notice of Violation (Notice).

If you choose to respond, your response will be made available electronically for public inspection in the NRC Public Document Room or from the NRC's document system (ADAMS) assessable from the NRC Web site at http://www.nrc.gov/reading-rm/adams.html. Therefore, to the extent possible, the responses should not include any personal privacy, proprietary, or safeguards information so that it can be made available to the public without redaction.

In accordance with 10 CFR 19.11, you may be required to post this Notice within two working days of receipt.

Dated this 27th day of July 2012

U. S. NUCLEAR REGULATORY COMMISSION
REGION II

Docket No.:	70-27
License No.:	SNM-42
Report No.:	70-27/2012-003
Licensee:	Babcock and Wilcox
Facility:	Lynchburg Facility
Location:	Lynchburg, VA 24505
Dates:	April 1, 2012 to June 30, 2012
Inspectors:	S. Subosits, Senior Resident Inspector M. Chitty, Resident Inspector
Approved by:	A. Blamey, Chief Fuel Facility Inspection Branch 1 Division of Fuel Facility Inspection

Enclosure 2

EXECUTIVE SUMMARY

Babcock and Wilcox
NRC Integrated Inspection Report 70-27/2012-003
April 1 – June 30, 2012

Inspections were conducted by resident inspectors during normal and off normal shifts in the areas of safety operations, radiological controls, and facility support. The inspectors performed a selective examination of licensee activities which were accomplished by direct observation of safety-significant activities and equipment, tours of the facility, interviews and discussions with licensee personnel, and a review of facility records.

Safety Operations

- Items relied on for safety were properly implemented and maintained in order to perform their intended safety function in accordance with the license application and regulatory requirements. However, one Severity Level IV Violation was identified for an operator's failure to adhere to a procedural requirement for the disassembly of a Special Nuclear Material (SNM)-bearing component which resulted in a breach of the component and the spread of radioactive contamination on the worker and the work area. (Paragraph A.1)

- Nuclear Criticality Safety postings were followed by personnel in the field. Safety analyses were properly documented for issues with the potential to impact nuclear criticality safety (Paragraph A.2)

- Area housekeeping was maintained in accordance with fire safety requirements for special nuclear material processing areas, equipment, and storage areas. Fire detection and suppression equipment was maintained in accordance with internal licensee procedures. (Paragraph A.3)

Radiological Controls

- Elements of the Radiation Protection program reviewed were implemented in accordance with the license application and regulatory requirements. (Paragraph B.1)

Facility Support

- A review of a sample of corrective action reports for safety-related issues verified that the appropriate corrective actions to prevent recurrence were identified and that extent of condition and extent of cause reviews were conducted as required by the governing corrective action program procedure. (Paragraph C.1)

- Preventive and corrective maintenance tasks were completed in accordance with work instructions and affected equipment met acceptance criteria for returning to service. (Paragraph C.2)

Attachment

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

REPORT DETAILS

Summary of Plant Status

During the inspection period, routine fuel manufacturing operations and maintenance activities were conducted in the fuel manufacturing areas and in the Research Test Reactors and Targets (RTRT) facility. Routine operations were also conducted in the Uranium Recovery (UR) facility.

A. Safety Operations

1. Plant Operations (Inspection Procedure (IP) 88135)

a. Inspection Scope and Observations

The inspectors performed daily tours of the facility's manufacturing areas housing special nuclear material (SNM), reviewed shift turnover logsheets, and observed a shift turnover meeting. The inspectors interviewed operators, front-line managers, material control and accounting technicians, and process engineering personnel regarding issues with plant equipment and to verify the status of the process operations.

The inspectors observed operations in progress in the Filler and RTRT areas throughout the inspection period. The inspectors observed that personnel conducting operations ongoing at the time of the walk downs were attentive to their duties and complied with the applicable Nuclear Criticality Safety (NCS) postings. The inspectors determined that SNM processing systems in service at the time of walkdowns in UR were operated in accordance with procedures. The inspectors verified that leaks in the UR area were cleaned up in accordance with facility spill and leak response procedures.

During the inspection period, the inspectors interviewed six operators, two of whom were in the process of becoming qualified as UR operators, to verify their knowledge of procedures and NCS posting requirements for their work areas. Each of the operators and technicians interviewed demonstrated adequate knowledge of the NCS posting requirements and the procedures associated with their assigned duties.

The inspectors conducted a safety system walkdown review of portions of the Specialty Fuels Facility (SFF) process and the Centrifugal Contactor Solvent Extraction process. The inspectors reviewed the safety significant controls and support systems related to the processing of SNM. The inspectors verified that the existing configurations of the systems were correct and that items relied on for safety (IROFS) were available and reliable to perform their function when needed to comply with the performance requirements of 10 CFR 70.61.

The inspectors reviewed eight controls designated as IROFS as documented in the integrated safety analysis (ISA) and Safety Analysis Report (SAR) 15.17 for the SFF Workstation 260 area and SAR 15.9 for the Centrifugal Contactor Solvent Extraction process, including supporting NCS evaluations and NCS Releases, and verified their implementation in the field. During the walk downs, the inspectors verified that the IROFS controls for the two areas were properly implemented by reviewing the system configuration in the field and discussing the requirements of applicable operating procedures and NCS postings with operations personnel in the area. The inspectors

verified that essential support systems such as enclosure ventilation and the air supply for diaphragm pumps were operational. The inspectors also verified that valves in the systems reviewed were positioned correctly and did not show obvious signs of leakage.

Failure to Adhere to Procedural Requirement During Disassembly of a Component Containing Special Nuclear Material

Introduction: A self-revealing violation of the B&W NOG license was identified when a breach of an SNM-bearing component occurred in Bay 12A. The breach occurred when an operator attempted to disassemble the component by removing more material in one machine pass than had been attempted during previous operations with similar components. The breach that occurred as a result of this action resulted in the spread of radioactive contamination to the worker and the work area.

Section 11.4 of the License Application required, in part, that activities at B&W NOG involving licensed material be performed in accordance with written and approved procedures. Contrary to this requirement, an operator failed to adhere to a procedural requirement intended to ensure against a breach of an SNM-bearing component.

Description: At approximately 7:30 p.m. on May 22, 2012, a breach of a SNM-bearing component was discovered by the machine technician in the Bay 12A component disassembly area when he performed a frisking survey of his hands and feet and the detector alarmed. Radiation Protection (RP) was notified to respond to the area and the RP technicians surveyed the individual for contamination.

The individual's hands, watch, arms and shoes were found to be contaminated and decontamination efforts were successful with the exception of his shoes which were disposed of as low level radioactive waste. Nasal smears were conducted on the individual and the results were negative. The individual submitted a bioassay sample. The results of the sample did not exceed the RP action level.

Radiation protection response actions also included performance of a contamination survey of the component and the work area. By approximately 2:00 a.m. on May 23, 2012, the Bay 12A work area was decontaminated by operations personnel. Because the area was cleaned up in less than 24 hours, the incident was not reportable under 10 CFR 70.50 (b)(1) criteria for unplanned contamination events. The breached component was packaged to prevent spread of contamination and placed in storage. The operation was shut down until management approval was given on June 18, 2012, to resume operations.

The machining task the individual performed was intended to disassemble larger encapsulated SNM-bearing components into smaller elements in preparation for scrap recovery in the UR area. This task had been performed multiple times without incident with this particular type of component in the weeks prior to the occurrence by the operators assigned to this area.

On May 23, 2012, a post-event critique was conducted and a Level 1 investigation was initiated to develop an event timeline, identify causal factors, and propose corrective actions to prevent a recurrence of the incident. The investigation found that the individual

did not follow the Procedure OP-1034221 instructions for safely removing material in one machine pass that were discussed in the pre-job walkthrough with supervision and utilized in disassembly of similar components in the weeks prior to the incident.

The operator's experience with the operation was a contributing factor. During a prior disassembly campaign of the component currently undergoing disassembly operations, he had seen a previous operator successfully remove a similar amount of material on the initial machine pass to the amount he attempted to remove on May 22. An additional contributing factor was the ineffective smearing technique the operator utilized because it did not detect the breach.

To address the causal factors, the licensee has identified corrective actions to: 1) provide a formal training package and walkthrough for future disassembly tasks; 2) provide training on effective smear techniques; and 3) revise applicable operating procedures to include requirements on machining specific components to preclude similar breach incidents in future disassembly operations.

Analysis: The failure to follow a procedural requirement for an operation with SNM was a performance deficiency and a violation of NRC requirements. The issue was more than minor because the failure resulted in a personnel contamination of the operator and contamination of the Bay 12A work area.

The inspectors evaluated this issue in accordance with the enforcement policy and the enforcement manual and noted that the violation was of very low safety significance because the issue resulted in a very low exposure to the individual based on bioassay results submitted following the component breach. In addition, the performance criteria of 10 CFR 70.61 were always maintained as the breach did not adversely affect relevant NCS parameters such as mass, spacing, or moderation.

Enforcement: Section 11.4 of the License Application for License SNM-42 stated, in part, that activities at B&W NOG involving licensed material shall be conducted in accordance with written and approved procedures. Contrary to the above, on May 22, 2012, a machine operator removed a quantity of material by machining during a component disassembly operation that was greater than had been attempted in previous operations with similar components. As a result of the action, the operator breached a SNM-bearing component. The breach of the component resulted in the spread of radioactive contamination to the operator and the work area. The licensee entered the issue into the corrective action (CA) system as CA201201573.

In accordance with the NRC Enforcement Policy, violations that are less serious, but are of more than minor concern and resulted in no or relatively inappreciable potential safety or security consequences, are characterized as Severity Level IV violations. The failure to follow a written procedure for an operation with licensed material as required by the facility license is a Severity Level IV violation (VIO) of NRC requirements and will be tracked as VIO 70-2012/2012-003-01, Failure to Adhere to Procedural Requirement during Disassembly Operation on a SNM Bearing Component.

b. Conclusion

One Severity Level IV violation of NRC requirements was identified.

2. Nuclear Criticality Safety (IP 88135)

a. Inspection Scope and Observations

During daily tours of the UR area and the general shop floor area, the inspectors verified that NCS controls and postings were in place and available to perform their intended functions. The inspectors reviewed a sample of three NCS-related IROFS in the UR area for implementation in the field. During their observations, the inspectors noted that the IROFS were properly implemented and that operations personnel complied with NCS posting requirements in the UR area.

The inspectors also reviewed for accuracy three SNM mass log tracking sheets and found the mass log entries matched the as-found inventories of the corresponding glovebox workstations. The inspectors reviewed the NCS Safety Concern Analyses for two NCS issues identified in the RTRT and Drum Count areas. The inspectors determined the conclusions were accurate and that NCS performance requirements were met.

b. Conclusion

No violations of NRC requirements were identified.

3. Fire Safety (IP 88135)

a. Inspection Scope and Observations

During daily plant tours, the inspectors verified that transient combustibles were being adequately controlled and minimized in the UR and Bay 5A areas. The inspectors conducted fire safety tours for RTRT shop floor areas of Bays 15 through 16. The inspectors reviewed the control of transient combustible material and ignition sources and fire detection and suppression capabilities in the areas. No regulatory issues were noted in the areas reviewed. The inspectors verified that housekeeping in the areas reviewed was sufficient to minimize the risk of fire.

b. Conclusion

No violations of NRC requirements were identified.

B. Radiological Controls

1. Radiation Protection (IP 88135)

a. Inspection Scope and Observations

During tours of radiological controlled areas, the inspectors verified workers complied with RP procedures. The inspectors observed plant personnel as they removed protective clothing at controlled area step-off pads. The inspectors also observed plant employees as they performed exit monitoring. The inspectors noted that RP personnel changed out personal air sampling device filter papers at the end of shifts in the areas of the plant requiring personal air sampling as required by internal RP procedure.

The inspectors reviewed two Radiological Work Permits (RWPs) concerning work activities for the UR controlled area and one RWP for the Filler controlled area. The RWPs contained appropriate instructions and were posted in the work areas for employees' review and observation. Workers in those areas signed onto the applicable RWP, verifying their knowledge of the entry requirements. The inspectors noted that for the portions of work activities observed plant workers wore the required dosimetry, used protective clothing in accordance with the applicable RWPs, and performed tasks in accordance with the RWP guidance.

b. Conclusion

No violations of NRC requirements were identified.

C. Facility Support

1. Management Organization and Controls (IP 88135)

a. Inspection Scope and Observations

The inspectors reviewed a sample of items entered into the licensee's CA system. The inspectors reviewed thirty eight corrective actions in the licensee's CA system to ensure that items pertinent to safety and non-conforming conditions were identified, investigated as necessary, and tracked to closure. The inspectors verified that the issues of most safety significance were properly identified and reviewed for apparent causes. The inspectors noted that, for those issues requiring extent of condition / extent of cause reviews, the reviews were completed and documented in the applicable CAs. The inspectors verified that appropriate corrective actions to prevent recurrence were identified in the CAs reviewed and tracked to completion in accordance with the licensee's CA system implementing procedure, Quality Work Instruction 14.1.1.

b. Conclusion

No violations of NRC requirements were identified.

2. Maintenance/Surveillance (IP 88135)

a. Inspection Scope and Observations

The inspectors observed maintenance activities in the UR area. The inspectors verified that the work was conducted in accordance with UR area maintenance procedure requirements and that equipment was adequately isolated to perform the clean out and repair activities observed during the period.

The inspectors reviewed the results of ten preventive maintenance work orders (WOs) and ten corrective maintenance WOs performed in the UR and SFF areas. The inspector verified that the equipment was repaired and returned to service without modifications requiring configuration changes. The inspectors verified the items were appropriately tested and met the acceptance criteria.

b. Conclusion

No violations of NRC requirements were identified.

D. Special Topics/Event Follow-up

None for this inspection period.

E. Exit Meeting

On June 29, 2012, the inspectors presented the inspection results to B. J. Burch and members of his staff. No dissenting comments were received from the licensee. Proprietary information was discussed but not included in the report.

SUPPLEMENTARY INFORMATION

1. KEY POINTS OF CONTACT

Clark, J., Radioactive Waste Management Engineer
Clay, H., Front Line Manager Core Assembly Operations
Cole, B., Manager of Licensing and Safety Analysis
Conway, K., Radiation Protection Manager
England, T., Licensing and Safety Analysis Engineer
Kirby, K., Licensing and Safety Analysis Engineer
Spangler, D., Section Manager, Nuclear Safety & Licensing
Terry, C., Unit Manager, Environmental Engineering
Ward. D., Department Manager, Environmental, Safety, Health and Safeguards

2. LIST OF ITEMS OPENED, CLOSED, AND DISCUSSED

Opened

70-27/2012-003-01	VIO	Failure to Adhere to Procedural Requirement during Disassembly of a Component Containing Special Nuclear Material (Paragraph D.1)

3. INSPECTION PROCEDURES USED

IP 88135, Resident Inspection Program for Category I Fuel Cycle Facilities

4. DOCUMENTS REVIEWED

Procedures:

OP-1034221, Filler Fabrication and Operation, Rev. 80
OP- 0061234, Maintenance in UPRR (U), Rev. 43
RP-02-01, Contamination Control Procedure, Rev. 13
RP-02-02, Contamination Control in Clean Rooms and Clean Areas, Rev.10
RP-02-03, Procedure for Monitoring and Quantifying Loose Contamination, Rev.6

Condition Reports Review:

CA201201025, CA201201026, CA201201027, CA201201048, CA201201092, CA201201109, CA201201136, CA201201140, CA201201169, CA201201220, CA201201233, CA201201243, CA201201260, CA201201275, CA201201288, CA201201315, CA201201316, CA201201338, CA201201339, CA201201340, CA201201360, CA201201363 CA201201366, CA201201371, CA201201376, CA201201387, CA201201392, CA201201419, CA201201425, CA201201433 CA201201444, CA201201450, CA201201465, CA201201469, CA201201471, CA201201485, CA201201500, CA201201573

Other Documents:

Employee Review of Area Documents, N-52, Rev 4
Change Request (CR), Update OP-0061134 with Changes to the HF Day Tank (U), CR-1036507, Rev. 00

Change Review Minutes, Form N-51, Rev. 15, Ref. QWI 5.1.12
Change Review Minutes, Form N-51A, Rev. 3, Ref. QWI 5.1.12
SAR 15.9, Main Extraction & Drum Dryer Processes in UR, Rev. 80, 12/15/2011
SAR 15.17, SFF Operations, Rev. 58, 10/19/2011
RWP 11-0045, Draining and Flushing of the HF Day Tank, Rev. 00, 6/27/2011 – 9/16/2011
RWP 12-013
RWP 12-014
RWP 12-018
Internal Audits 260-5E, 260-5G, 260-5H, 260-5I and 260-5J
NCS-2012-0088, "Safety Concern Analysis for Filter in Drum Count Area 5-gallon Bucket Storage Rack," Rev. 0
NCS-2012-0094, "Safety Concern Analysis for Uranium Detected in RTR Arc Melt Vacuum Pump," Rev. 0