



HITACHI

GE Hitachi Nuclear Energy

Thomas A. Caine
Manager,
Vallecitos Nuclear Center

6705 Vallecitos Rd
Sunol, CA 94586
USA

T 925 862 4344
F 815 953 8211
Thomas.Caine@ge.com

TAC 14-005

November 24, 2014

U.S. Nuclear Regulatory Commission
Region IV, Division of Nuclear Materials Safety
1600 E. Lamar Blvd.
Arlington, TX 76011-4511
Attention: Mr. Robert Evans

Subject: GEH Response to Notice of Violation - SNM-960 Training Requirement

References: 1) NRC License SNM-960, Docket 70-754
2) NRC Re-Exit Meeting Teleconference, Region IV to GEH, 11/14/14

Dear Mr. Evans:

Attached to this letter is GEH's response to the violation as discussed on November 14, 2014 (Reference 2) for failing to provide annual criticality safety refresher training.

Please contact me at (925) 862-4344 if you have any questions or would like to discuss this matter further.

Sincerely,

T.A. Caine

Thomas Caine, Manager
Vallecitos Nuclear Operations

Commitments: None

Attachment: GEH Response to Notice of Violation

cc: Breeda Reilly, US NRC, NMSS
Ray L. Kellar, US NRC, RIV

Attachment

Violation:

Contrary to the requirements in the SNM-960 license, Section 5.8 - Criticality Safety Training, annual refresher training was not provided to personnel working with SNM in Criticality Limit Areas since 2011.

Response:

1) The reason for the violation

VNC has had limited SNM movements in the past several years. During that time, procedures were developed and followed to assure that only small, safe amounts of SNM were handled. Because of the small amount of material in use and the specific procedures and training provided, the radiological training procedure was updated to remove the annual refresher training requirement and instead required training if/when more than a small, safe amount were to be moved. As the procedure was being changed, VNC personnel did not also revise the license, so the procedure and practices were then out of compliance with the license.

2) Short term corrective actions taken (tracked in Condition Report 12888)

- A compliance calendar item was added on November 18, 2014 to provide an annual reminder of the need for annual training.
- Criticality refresher training of personnel was provided on November 19, 2014.
- The training procedure, VSS 8.1, was updated on November 19, 2014 to require annual refresher training.

3) Longer term preventive actions

None are required at this time. Once the SNM-960 license is renewed, training requirements will be revised as appropriate to be consistent with the renewed license.

4) The date when full compliance will be achieved

Full compliance was achieved November 19, 2014.