



November 20, 2015  
15-149

ATTN: Document Control Desk  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555-0001

Reference: (1) License SNM-42, Docket 70-27  
(2) Letter dated October 22, 2015, Lesser (NRC) to Burch (BWXT), BWXT NOG-L  
Nuclear Regulatory Commission Special Inspection Report 70-27/2015-008

Subject: Response to Apparent Violations in Inspection Report No. 70-27/2015-008

Dear Sir or Madam:

BWXT Nuclear Operations Group-Lynchburg (NOG-L) is providing a written response to the Apparent Violations (AV) in Inspection Report No. 70-27/2015-008 (Reference 2). The response to the AVs is provided in the four attached Enclosures.

BWXT NOG-L acknowledges that the violations existed as stated in the NRC Apparent Violations. Provided within Enclosure 1 is a detailed process description and the safety basis information for manufacturing Advanced Gas Reactor (AGR) low enriched uranium (LEU) fuel in the Specialty Fuel Facility (SFF). Enclosure 2 provides an explanation for Apparent Violation AV 70-27/2015-008-01 and a status of planned and completed corrective actions. Enclosure 3 provides an explanation for Apparent Violation AV 70-27/2015-008-02 and a status of planned and completed corrective actions. Although separated into two enclosures to address each specific violation, please consider the reasons for the violations and corrective actions wholly to fully understand the depth and breadth of the investigation and corrective actions. Enclosure 4 includes a Request for Enforcement Consideration in which BWXT NOG-L requests that the NRC consider 1) consolidating the AVs due to their cause and effect relationship as described in the NRC's Enforcement Manual, and 2) assigning credit for Licensee Identification and for an Immediate, Effective and Comprehensive Investigation and Corrective Actions in your evaluation of the appropriate enforcement.

If you have questions or require additional information, please contact Chris Terry, Manager of Licensing and Safety Analysis, at [cterry@bwxt.com](mailto:cterry@bwxt.com) or 434-522-5202.

Sincerely,

B. Joel Burch  
Vice President and General Manager  
BWXT Nuclear Operations Group, Inc. – Lynchburg

Enclosures

cc: NRC, Region II  
NRC, Resident Inspector  
NRC, M. Baker

IE03  
RSMII