



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

January 25, 2016

Dr. Ronald J. Land
Site Manager
AREVA, Inc.
2101 Horn Rapids Road
Richland, WA 99354-0130

**SUBJECT: AREVA NP, INC. (RICHLAND) – NUCLEAR REGULATORY COMMISSION
INTEGRATED INSPECTION REPORT 70-1257/2015-005**

Dear Dr. Land:

The Nuclear Regulatory Commission (NRC) conducted an announced, routine inspection during the fourth quarter of calendar year 2015 (October 1 to December 31, 2015), at the AREVA NP, Inc., facility in Richland, Washington. The purpose of the inspection was to review the implementation of programs and procedures for emergency preparedness and triennial fire protection. The enclosed report presents the results of the inspections. At the conclusion of the inspections, the results were discussed with you and members of your staff at an exit meeting held on November 5, 2015.

During the inspection, NRC staff examined activities conducted under your license, as they relate to public health and safety, to confirm compliance with the Commission's rules and regulations and with the conditions of your license. The inspections consisted of facility walk-downs, selective examinations of relevant procedures and records, interviews with plant personnel, and observations of activities. Based on the results of these inspections, no findings of significance were identified.

In accordance with Title 10 of the *Code of Federal Regulations* 2.390 of NRC's "Rules of Practice and Procedure," 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 Agency wide Documents Access and Management System (ADAMS), which is accessible from the NRC Website at <http://www.nrc.gov/reading-rm/adams.html>.

R. Land

2

If you have any questions, please call me at (404) 997-4555.

Sincerely,

/RA/

Eric C. Michel, Chief
Projects Branch 2
Division of Fuel Facility Inspection

Docket No. 70-1257
License No. SNM-1227

Enclosure:
NRC Inspection Report 70-1257/2015-005
w/Supplemental Information

cc: (See page 3)

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DISTRIBUTION:

- M. Crespo, RII
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- P. Silva, NMSS
- PUBLIC

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 ADAMS: Yes
 ACCESSION NUMBER: ML16026A013
 SUNSI REVIEW COMPLETE
 FORM 665 ATTACHED

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E-MAIL COPY?	YES NO	YES NO	YES NO	YES NO	YES NO	YES NO	YES NO

cc:

Loren J. Maas, Manager
Licensing and Compliance
AREVA NP, Inc.
2101 Horn Rapids Road
Richland, Washington 99354

Calvin D. Manning, Manager
Nuclear Criticality Safety
AREVA NP, Inc.
2101 Horn Rapids Road
Richland, Washington 99354

Timothy J. Tate, Manager
Environmental, Health, Safety & Licensing
AREVA NP, Inc.
2101 Horn Rapids Road
Richland, Washington 99354

David Jansen, Director
Office of Radiation Protection
Department of Health
PO Box 47827
Olympia, Washington 98504-7827
david.jansen@doh.wa.gov

Earl Fordham, Deputy Director
Office of Radiation Protection
Department of Health
309 Bradley Boulevard, Suite 201
Richland, Washington 99352

U. S. NUCLEAR REGULATORY COMMISSION
REGION II

Docket No.: 70-1257

License No.: SNM-1227

Report No.: 70-1257/2015-005

Licensee: AREVA NP, Inc.

Facility: Richland Facility

Location: Richland, Washington 99354

Dates: October 1 through December 31, 2015

Inspectors: D. Anderson, Fuel Facility Inspector (A.1)
M. Crespo, Senior Fuel Facility Inspector (Section A.1)
R. Gibson, Senior Fuel Facility Inspector (Section B.1)
G. Goff, Fuel Facility Inspector (Section A.1)
N. Morgan, Fuel Facility Inspector, Inspector-In-Training (Section A.1)
M. Semmes, Fire Protection Engineer (Section A.1)

Approved by: E. Michel, Chief
Projects Branch 2
Division of Fuel Facility Inspection

Enclosure

EXECUTIVE SUMMARY

AREVA NP, INC. - Richland
NRC Integrated Inspection Report 70-1257/2015-005
October 1 through December 31, 2015

An inspection was conducted by regional inspectors during normal shifts in the areas of emergency preparedness and triennial fire protection. The inspectors performed a selective examination of licensee activities that 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. No safety significant findings were identified during this inspection.

Safety Operations

- The Fire Safety program was implemented in accordance with the license application and regulatory requirements. (Paragraph A.1)

Facility Support

- The Emergency Preparedness program was implemented in accordance with the Emergency Plan, license application, and regulatory requirements. (Paragraph B.1)

Attachment

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

REPORT DETAILS

Summary of Plant Status

The AREVA-Richland facility converts uranium hexafluoride (UF_6) into uranium dioxide (UO_2) for the fabrication of low-enriched fuel assemblies used in commercial light water reactors. During the inspection period, normal production activities were ongoing.

A. Safety Operations

1. Fire Protection – Triennial (Inspection Procedure (IP) 88054)

a. Inspection Scope and Observations

The inspection effort focused on the Dry Conversion Facility (DCF), UO_2 Building, the Specialty Fuels (SF) Building, Engineering Laboratory Operations Building (ELO), Uranyl Nitrate Storage Tank Building, warehouses, and the maintenance building.

The inspectors reviewed the Fire Hazards Analysis (FHA) for the ELO Building, UO_2 Building, SF Building, and the DCF. The inspectors also reviewed the Pre-Emergency Plans for the above buildings and identified no significant differences or deficiencies. As part of the Pre-Emergency Plan walk-down, the inspectors verified the condition of passive fire protection features, primarily the designated firewalls. The inspectors noted that the licensee had performed an assessment of the condition of the firewalls in accordance with Engineering Information Record (EIR) Document No. 51-9174438-000, "Horn Rapids Road (HRR) Fire Barrier Function List" and EIR Document No. 51-9178844-000, "HRR Facility Penetration Seal Analysis" to determine if any of the remaining penetrations needed to be sealed. No issues were noted with the condition of the firewalls or the assessments performed. The inspectors also evaluated the preventative maintenance records and procedures for the fire dampers in the process areas.

The inspectors reviewed the licensee's combustible and flammable material control and ignition source programs. The inspectors noted that the combustible and flammable control program included items relied on for safety (IROFS) 4502, which limited the amount and proximity of combustible and flammable materials, and IROFS 4503, which provided an independent procedure verification to determine compliance with the combustible control program. The inspectors selected a sample of designated loading zones in DCF and the UO_2 process areas and verified that they were below the allowable combustible material storage amounts designated in drawing CSA-607.590. The inspectors reviewed the hot work permit program and determined that the licensee established adequate measures to control ignition sources throughout the facility. The inspectors verified that postings for water-based fire-fighting restrictions were present for the applicable process areas per E04-NCSS-G06, Fire Prevention and Firefighting, Version 23.0. The inspectors noted no environmental issues that could be caused by the use of water based suppression systems.

The inspectors reviewed the justification for continued operations for Warehouses 1, 2 and 3, as the fire alarm systems were disabled as part of the upgrade to the site systems. Individuals listed on the fire watch list were confirmed to be trained and

qualified by a review of training records. The inspectors also observed that specific fire protection equipment such as extinguishers, heat detectors, smoke detectors, pull boxes, strobe lights, speakers, and emergency lighting were in the correct locations as indicated on drawings. The inspectors noted that the condition of the above equipment was adequate and that the corresponding preventive maintenance had been performed within the required schedule without incident.

The inspectors accompanied a licensee employee and vendor on a quarterly fire sprinkler preventive maintenance task on selected buildings. Inspectors noted that communications were adequate during the pre-job briefing and during the performance of the task. Parameters tested were the alarm responses to tampering on the systems, flow and pressure switch trips, and drain tests. For each system tested, the alarm responded within the required time allowance. Inspectors also interviewed fire alarm system engineers and, as a result, determined that electrically powered fire alarms had a back-up power supply.

The inspectors reviewed the licensee's program regarding fire response capability. The inspectors reviewed the training for personnel regarding administrative IROFS for the process buildings (E04-NCSS-G06, Fire Prevention and Firefighting, Version 23.0). The inspectors also spoke with several operators on the process floor regarding their expected response to a fire, and noted their response was in accordance with the procedures (i.e., evacuate if a fire is discovered). The inspectors also reviewed the licensee's annual general employee safety training to ensure that it contained the general awareness training with respect to fire safety as stated in the license application.

The inspectors verified the operational readiness and testing of on-site communication radios in the event of an emergency. The inspectors reviewed the AREVA Memorandum of Agreement with the Richland Fire Department and also interviewed a battalion chief at the Richland Fire Department. The inspectors determined that the off-site fire department had been offered opportunities for site orientation and training and that a current pre-emergency plan had been maintained at the fire station.

The inspectors reviewed recent corrective actions, audits, and several preventive maintenance records to determine if the licensee was adequately identifying, assessing, and resolving issues. The inspectors also reviewed the Fire Hazard Inspection Report, Richland Plant, June 24, 2013, and the corrective actions it generated. The inspectors determined that the licensee was adequately identifying and correcting issues.

b. Conclusion

No violations of significance were identified.

B. Facility Support

1. Emergency Preparedness (IP 88050)

a. Inspection Scope and Observations

The inspectors interviewed staff, reviewed records, and determined that any changes made to the Emergency Plan or within the facility had been properly coordinated within

the emergency preparedness program. The inspectors reviewed procedures with significant revisions since the last emergency preparedness inspection and determined that the changes were in compliance with the Emergency Plan. The inspectors discussed and reviewed the licensee emergency call list and verified that the list was current.

The inspectors reviewed Plant Emergency Response Management Team and Plant Emergency Response Team training records and interviewed licensee staff regarding emergency preparedness training in the past year. The inspectors determined that the training requirements were in compliance with the Emergency Plan. The inspectors verified that the licensee provided training for their personnel and tested emergency equipment as per the Emergency Plan. Inspectors confirmed that the individuals responsible for utilizing the emergency equipment were qualified. The inspectors verified that the licensee provided training for hypothetical emergency situations which were effective and consistent with the frequency and performance objectives required in the Emergency Plan. The inspectors attended a first-aid training session for selected members of the Plant Emergency Response Team and determined that the training was in compliance with the training requirements.

The inspectors reviewed the written agreements with the off-site agencies and verified that the organizations, required by the Emergency Plan, had up-to-date mutual aid agreements, and a Memorandum of Understanding. The inspectors interviewed representatives of the Richland Fire Department and the Kadlec Regional Medical Center and determined that each maintained an adequate understanding of the written agreements. The inspectors interviewed off-site personnel and reviewed records and verified that the licensee invited the off-site agencies for training as required by the Emergency Plan and determined that the training given was in accordance with the license application. The inspectors reviewed records and verified that the licensee performed communication checks with the off-site organizations at a quarterly frequency as required by the Emergency Plan.

The inspectors observed the storage of the emergency equipment repositories at the Emergency Operations Center (EOC), the DCF, the SF Building, the ELO Building, the UO₂ Building, the maintenance building, the Central Emergency Equipment Shed, and the machine shop, and verified that the inventory levels were maintained as required by the Emergency Plan. The inspectors performed a check of selective items of emergency response equipment and verified functionality. The inspectors also verified that the required maintenance and testing of the emergency response equipment were conducted at the required frequency. The inspectors toured the on-site EOC and the Alternate EOC at Energy Northwest and verified that the areas were readily accessible and maintained the appropriate amount of communication equipment. The inspectors reviewed the accountability procedure and verified that accountability meeting points were accessible.

The inspectors reviewed independent audits of the emergency program and verified that any problems or deficiencies were corrected. The inspectors reviewed the self-assessments generated since the last inspection and verified that the licensee utilized their tracking system to adequately track and resolve self-assessment findings.

b. Conclusion

No violations of significance were identified.

C. Exit Meeting

The inspection scope and results were presented to members of the licensee's staff at daily debriefings during the inspection and at the exit meeting on November 5, 2015, with T. Tate and staff. No dissenting comments were received from the licensee. Proprietary information was discussed, but not included, in the report.

SUPPLEMENTAL INFORMATION

1. KEY POINTS OF CONTACT

<u>Name</u>	<u>Title</u>
J. Deist	Environmental, Health, Safety and Licensing
R. Duncan	Battalion Chief, Richland Fire Department
B. Hammons	RN, Kadlec Medical Center
D. Harris	Principal Mechanical Engineer (Project and Reliability)
B. Judkins	Lead Technician, Operations
P. Lee	Preventive Maintenance Manager
L. Maas	Licensing and Compliance Manager
C. Manning	Nuclear Criticality Safety Manager
B. Mooney	Plant Engineer
S. Nunez	Emergency Preparedness/Security
K. Olsen	Plant Engineer (Project and Reliability)
S. Powers	Project and Reliability Engineer
B. Rodger	Battalion Chief, Richland Fire Department
T. Tate	Environmental, Health, Safety and Licensing Manager
B. Tilden	Operations Manager
J. Veysey	Maintenance Manager
S. Wright	Safety Manager

Other licensee employees contacted included operators, technicians, production staff, and office personnel.

2. LIST OF ITEMS OPENED, CLOSED, AND DISCUSSED

None

3. INSPECTION PROCEDURES USED

IP 88050	Emergency Preparedness
IP 88054	Fire Protection (Triennial)

4. DOCUMENTS REVIEWED

Records:

CG06P001, Fire Hazard Inspection 1Mo OPCH, October 1, 2015
CG06P002, Safety Inspection 1Mo OPWA, October 1, 2015
CG06P003, Safety Inspection 1Mo OPCR, October 22, 2015
CG06P004, Safety Inspection 1Mo OPRD, October 5, 2015
CG06P005, Safety Inspection 1Mo OPCG, October 5, 2015
CG06P006, Safety Inspection 1Mo MG, October 28, 2015
CG06P007, Safety Inspection 1Mo SHIP, October 29, 2015
CG06P008, Safety Inspection 1Mo ALAB, October 1, 2015
CG06P009, Safety Inspection 1Mo MA, October 29, 2015
CG06P010, Safety Inspection 1Mo MG, October 29, 2015
CG06P012, Fire Hydrant Flow Test 12Mo RE, May 8, 2014
CG06P012, Fire Hydrant Flow Test 12Mo RE, June 11, 2015

CG06P013, Fire Door 12 Mo MW, IROFS Building UO₂, August 15, 2015
 CG06P019, Fire Sprinklers 3Mo PS, July 11, 2015
 CG06P019, Fire Sprinklers 3Mo PS, August 6, 2015
 Engineering Information Record, Document No. 51-9174438-000, HRR Fire Barrier Function List, December 21, 2011
 Engineering Information Record, Document No. 51-9178844-000, HRR Facility Penetration Seal Analysis, March 15, 2012
 ESP00004-0001 Sprinkler System 1Mo PF, ES Sprinkler System Dry, September 7, 2015
 ESP00004-0001 Sprinkler System 1Mo PF, ES Sprinkler System Dry, October 13, 2015
 ESP00004-0002 Sprinkler System 1Mo PF, ES Sprinkler System Dry, September 7, 2015
 ESP00004-0002 Sprinkler System 1Mo PF, ES Sprinkler System Dry, October 3, 2015
 ESP00004-0003 Sprinkler System 1Mo PF, IROFS SPRNKLR System WHS 1/2/3 Dry Pipe, September 7, 2015
 ESP00004-0003 Sprinkler System 1Mo PF, IROFS SPRNKLR System WHS 1/2/3 Dry Pipe, October 3, 2015
 ESP00005-0001 Sprinkler Wet 1Mo PF, ES Sprinkler System Wet, September 7, 2015
 ESP00005-0001 Sprinkler Wet 1Mo PF, ES Sprinkler System Wet, October 3, 2015
 ESP00005-0002 Sprinkler Wet 1Mo PF, ES Sprinkler System Wet, September 7, 2015
 ESP00005-0002 Sprinkler Wet 1Mo PF, ES Sprinkler System Wet, October 3, 2015
 ESP00005-0003 Sprinkler Wet 1 Mo PF, ES Sprinkler System Wet, September 7, 2015
 ESP00005-0003 Sprinkler Wet 1Mo PF, ES Sprinkler System Wet, October 3, 2015
 ESP00005-004 Sprinkler Wet 1Mo PF, ES Sprinkler System Wet, September 7, 2015
 ESP00005-004 Sprinkler Wet 1Mo PF, ES Sprinkler System Wet, October 3, 2015
 ESP00005-005 Sprinkler Wet 1Mo PF, ES Sprinkler System Wet, September 7, 2015
 ESP00005-005 Sprinkler Wet 1Mo PF, ES Sprinkler System Wet, October 3, 2015
 ESP00005-006 Sprinkler Wet 1Mo PF, ES Sprinkler System Wet, September 7, 2015
 ESP00005-006 Sprinkler Wet 1Mo PF, ES Sprinkler System Wet, October 3, 2015
 ESP00005-007 Sprinkler Wet 1Mo PF, ES Sprinkler System Wet, October 3, 2015
 ESP00005-007 Sprinkler Wet 1Mo PF, ES Sprinkler System Wet, September 7, 2015
 IR ARV 3SE IG 13-029, Rev. 0, Fire Hazard Inspection Report Richland Plant, June 24, 2013
 JCO: 2015-011
 PMs: CG06P011, CG06P016, CG06P017, CG06P017XX, CG06P018, CG06P019, 005093, 005126, 005127, 005091
 PM000048, Hydrant Flush 6Mo PF, Hydrants Sanitary Water, September 18, 2014
 PM000048, Hydrant Flush 6Mo PF, Hydrants Sanitary Water, March 10, 2015
 PM000091, Emergency Repository & First Aid Equipment (1 Mo), Revision 21
 PM000334, Water Valves 1Mo PF, Valves Main Sanitary Water, September 7, 2015
 PM000334, Water Valves 1Mo PF, Valves Main Sanitary Water, October 4, 2015
 PM001868, Main Water Valves 12Mo PF, Valves Main Sanitary Water, August 14, 2014
 PM001868, Main Water Valves 12Mo PF, Valves Main Sanitary Water, August 7, 2015
 PM004392, Sprinkler Sys Dry Pipe 10Y RE IROFS Fire Extinguishers and Systems, February 23, 2010
 PM004392, Sprinkler Sys Dry Pipe 5Y RE IROFS Fire Extinguishers and Systems, August 20, 2015
 PM004445, Dry Chem & UO₂ Fire Sys 6Mo PS, IROFS Fire Extinguishers & Systems, July 21, 2015
 PM004942, Emergency Repository and First Aid Equipment (12 Mo), Rev. 2

PM004949, NOVEC Fire Suppression 6Mo PS, ES Suppressor Fire System OB#9,
January 22, 2015

PM005157, Fire Suppression System 6Mo PF, Suppression Fire System (EDM),
January 11, 2015

PM005157, Fire Suppression System 6Mo PF, Suppression Fire System (EDM), July 22,
2015

Procedures:

ADM-00006, Administrative Procedure for Documentum DCM Documents, Version 25.0

E04-NCSS-G06, Criticality Safety – NCSS, Fire Prevention and Firefighting,
Version 23.0

E08-01-1, Emergency Plan, Version 11

E08-03-1.1, Classifying an Emergency, Version 5.1

E08-03-3.1, Plant Emergency Director, Version 6

E08-03-3.4, Accountability Liaison, Version 7

E08-03-3.7, Staging Area Supervisor, Version 4

E08-03-3.8, PERT Incident Commander, Version 6.2

E08-03-3.12, Central Guard Station Officer, Version 4.1

E08-03-4.2, Incident Notification Worksheet – Alert and HazMat Level 2, Version 12

E08-03-4.3, Incident Notification Worksheet – Site Area Emergency and HazMat
Level 3, Version 14

E08-03-8.3, Plant Evacuation Procedures – Onsite, Version 3.3

E08-03-8.5, Emergency Equipment Lists, Version 8

E08-03-8.8, Response to Imminent Threats, Version 5.1

E08-04-1, Letters of Agreement, Version 4.1

E12-03-001, Review of EP Plan and Relevant Procedures, Version 3.3

E12-03-002, Independent Audit of EP Program, Version 5

E12-03-030, Fire Prevention Audits, Version 3.2

MCP-30031, Flammable and Combustible Liquids/Solids Storage & Handling,
Version 10.0

MCP-30039, Hot Work Procedure, Version 8.1

MCP-30040, Fire Protection Program, Version 8.1

MCP-30532, Essential Materials Class III: HEPA Filters, Version 3.1

SOP 40841, Preventive Maintenance, Version 9.0

SOP 40857, Maintenance Hot Work Permit Procedure, Version 8.0

Condition Reports Reviewed:

2014-5857; 2015-2154, 3849, 5780, 6341; 2015-8858-FA

Other Documents:

Adopted codes-City of Richland

Certificates of Occupancy: Dry Conversion, April 8, 1997; E.L.O. Testing Addition,
6/28/83; Ammonia Recovery Building [Addition], 2/21/84

Chapter 9: Fire Protection Systems, 2012 International Fire Code, page 97

Chapter 20.26, Rules and Regulations for Manual and Automatic Fire Alarm Systems
(Richland Municipal Fire Code)

City Code (Lake Stevens), Chapter 14.84, Fire Code

Combustible loading locations

CSA-607,590 Sheet No. 32, Rev. 17

E08-04-2.12, Emergency Preparedness – Part IV – MOUs, Richland Fire Department, Version 2.2
E08-05-02.5, Pre-Emergency Plan, Uranyl Nitrate Storage Building, Version 1.0
E08-05-02.7, Pre-Emergency Plan, UF6 (48G) Cylinder Receiving and Storage Facility, Version 3.0
E08-05-2.10, Pre-Emergency Plan, Warehouse 7, Version 1
E08-05-004, Pre-Emergency Plan, Uranium Oxide Building, Version 1.0
E08-05-005, Pre-Emergency Plan, Dry Conversion Facility, version 1.0
E08-05-009, Pre-Emergency Plan, UF6 Cylinder Recertification Facility (UCRF) Building Pin 31097, Version 1.0
E08-05-010, Pre-Emergency Plan, Uranyl Nitrate Hexahydrate (UNH) Drum Storage Warehouse Building Pin 31062, Version 1.0
E08-05-011, Pre-Emergency Plan, Blended Dysprosium Uranium/Solids Processing Facility, Version 1.0
E08-05-012, Pre-Emergency Plan, Production Development Test Facility, Version 1.0
E08-05-013, Pre-Emergency Plan, Modular Extraction/Recovery Facility (MERF) Building Pin 31095, Version 1.0
E08-05-016, Pre-Emergency Plan, Warehouse Bays 1-3, Version 1
E08-05-017, Pre-Emergency Plan, Warehouse Bay-4, Version 1
E12-03-030, Fire Prevention Audits, Version 3.2
E12-03-031, Fire Extinguisher Inspections, Version 3.2
E14-02-004, UO₂ Building Fire Hazards Analysis, version 4.0
E15-01-2.10, Integrated Safety Analysis – ISA Summaries, Part 2 – Chapter 10 – Dry Conversion Facility, Version 12.0
E24-01-102, Fire Protection – Fire Hazards Analyses, Fire Hazards Analysis – Dry Conversion Facility, Version 1.0
E24-01-102, Fire Protection – Fire Hazards Analyses, Fire Hazards Analysis – Dry Conversion Facility, Version 1.0
Fire Alarm System Heat Detector & Pull Stations Location Plan (UO₂ Building), EMF-616, 610, Rev. 22
Fire Hydrant Flow Test Data Summary (5-03-12 to 6-11-15)
International Codes – Adoption by State (October 2015)
ISA Search Form (IROFS 4535.10, 4535.20)
P&IDs: Horn Rapids Road Site Arrangement Fire & Water Supply, EMF-608, 610, Rev. 2
Pre-Emergency Building Plans, EMF-608, 623, Rev. 6
Richland Fire Department, AREVA Complex File, DFM Scheduled Inspection – North, April 4, 2015
SAP History - Fire Suppression Inspection (11-4-11 to 10-13-15)