



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

January 26, 2016

Gary J. Laughlin, Chief Nuclear Officer
and Head of Operations
URENCO USA
P.O. Box 1789
Eunice, NM 88231

**SUBJECT: LOUISIANA ENERGY SERVICES, URENCO USA FACILITY – NUCLEAR
REGULATORY COMMISSION INTEGRATED INSPECTION REPORT NUMBER
70-3103/2015-005**

Dear Mr. Laughlin:

This refers to the inspections conducted during the fourth quarter of calendar year 2015, at the Louisiana Energy Services (LES), URENCO USA facility, located in Eunice, New Mexico. The purpose of the inspections 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 the inspections. The findings were discussed with members of your staff at exit meetings held on October 15 and December 10, 2015, for this integrated inspection report.

During the inspections, the NRC staff examined activities conducted under your license as they related to public health and safety 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.

The inspections covered the following areas; Emergency Preparedness, Evaluation of Exercises and Drills, Operational Safety, Nuclear Criticality Safety, and Plant Modifications.

Based on the results of the inspections, the NRC has determined that one Severity Level IV violation of NRC requirements occurred. This violation is being treated as a Non-Cited Violation (NCV), consistent with Section 2.3.2 of the Enforcement Policy. This NCV is described in the enclosed inspection report. If you contest the violation or significance of this NCV, you should provide a response within 30 days of the date of this inspection report, with the basis for your denial, to the Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington DC 20555-0001, with copies to: (1) the Regional Administrator, Region II; and (2) the Director, Office of Enforcement, United States Nuclear Regulatory Commission, Washington, DC 20555-0001.

In accordance with Title 10 of the Code of Federal Regulations (10 CFR) Section 2.390 of the NRC's "Rules of Practice and Procedure," a copy of this letter and enclosure 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>.

Should you have any questions concerning the inspections, please contact us.

Sincerely,

/RA/

Marvin D. Sykes, Chief
Projects Branch 1
Division of Fuel Facility Inspection

Docket No. 70-3103
License No. SNM-2010

Enclosure:
NRC Inspection Report No. 70-3103/2015-005
w/Attachment: Supplementary Information

cc: (See page 3)

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cc: (See page 3)

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NAME	TVukovinsky	NPitoniak	JMunson	TSippel	DAnderson	RWomack	NMorgan
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cc:

Butch Tongate, Deputy Secretary
New Mexico Department of Environment
Office of the Secretary
1190 St. Francis Drive
P. O. Box 26110
Santa Fe, NM 87502-0157

Matt White, Mayor
City of Eunice
P.O. Box 147/1106 Ave J
Eunice, NM 88231

The Honorable Sam D. Cobb, Mayor
City of Hobbs
200 E. Broadway
Hobbs, NM 88240

Cheryl Chance, Mayor
City of Jal
P.O. Drawer 340
Jal, NM 88252

Dave Sexton
President and Chief Executive Officer
P.O. Box 1789
Eunice, NM 88231
Dave.Sexton@Urenco.com

Clint Williamson
Vice President of Community and External Relations
P.O. Box 1789
Eunice, NM 88231
Clint.Williamson@urengo.com

Perry Robinson
Outside General Counsel
National Enrichment Facility
P.O. Box 1789
Eunice, NM 88231

Richard A. Ratliff, PE, LMP
Agreement State Director
Bureau of Radiation Control
1100 West 49th Street
Austin, TX 78756-3189

Commissioner Gregory H. Fulfer
Chairman
Lea County Board of County
Commissioners
Lea County Courthouse
100 North Main, Suite 4
Lovington, NM 88260

Daniel F. Stenger, Counsel
Hogan Lovells US LLP
555 13th Street, NW
Washington, DC 20004

Santiago Rodriguez, Acting Chief
Radiation Control Bureau
New Mexico Environment
Department
1190 St. Francis Drive
Room S 2100
Santa Fe, NM 87502

U. S. NUCLEAR REGULATORY COMMISSION
REGION II

Docket No: 70-3103

License: SNM-2010

Report No: 70-3103/2015-005

Licensee: Louisiana Energy Services, L.L.C. (LES)

Facility: URENCO USA, National Enrichment Facility (NEF)

Location: Eunice, NM 88231

Inspection Dates: October 1 through December 31, 2015

Inspectors: D. Anderson, Fuel Facility Inspector, DFFI (Paragraph A.1)
J. Munson, Fuel Facility Inspector, DFFI (Paragraphs A.2 and C.1)
T. Sippel, Fuel Facility Inspector, DFFI (Paragraph B.1)
R. Womack, Fuel Facility Inspector (training), DFFI (Paragraph A.1)
N. Morgan, Fuel Facility Inspector (training), DFFI (Paragraphs B.1 and B.2)
N. Pitoniak, Fuel Facility Inspector, DFFI (Paragraphs B.1 and B.2)
T. Vukovinsky, Fuel Facility Inspector, DFFI (Paragraphs B.1 and B.2)

Approved by: M. Sykes, Chief
Projects Branch 1
Division of Fuel Facility Inspection

Enclosure

EXECUTIVE SUMMARY

Louisiana Energy Services, L.L.C., URENCO USA (UUSA)
NRC Integrated Inspection Report 70-3103/2015-005
October 1 through December 31, 2015

This is a quarterly integrated inspection report that documents announced, routine inspections that were conducted by Nuclear Regulatory Commission (NRC) regional inspectors during normal shifts in the areas of safety operations and facility support. 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.

Safety Operations

- The Items Relied on for Safety reviewed were properly implemented and maintained in order to perform their intended safety function (Paragraph A.1).
- The Nuclear Criticality Safety program was implemented in accordance with the license, Safety Analysis Report, and regulatory requirements (Paragraph A.2).

Facility Support

- The Plant Modifications program was implemented in accordance with the Safety Analysis Report and regulatory requirements (Paragraph B.1).
- The Emergency Preparedness program was implemented in accordance with the Emergency Plan and regulatory requirements. One violation of NRC requirements was identified. (Paragraph B.2)
- The graded biennial emergency drill was implemented in accordance with the Emergency Plan and regulatory requirements. (Paragraph B.3)

Other Areas

- Follow-up on Unresolved Item (URI) 70-3103/2014-005-01, Criteria for Changes to Licensing Basis Documents. The change management program was found to be adequately implemented; this item is closed. (Paragraph C.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 Louisiana Energy Services (LES), URENCO USA Facility, enriches uranium hexafluoride (UF₆) for the fabrication of low-enriched fuel assemblies used in commercial light water reactors. During the inspection period, normal production activities were ongoing. Construction and testing in some areas of Separation Building Module (SBM) 1005 and other applicable process areas continued in preparation for future operation of additional cascades and equipment.

A. Safety Operations

1. Operational Safety (Inspection Procedure (IP) 88020)

a. Inspection Scope and Observations

The inspectors interviewed staff and reviewed records associated with the Cylinder Receipt and Dispatch Building (CRDB) and the SBM process areas. The inspectors determined that the administrative Items Relied on for Safety (IROFS) from the Product System are being adequately implemented and properly communicated as described in the Integrated Safety Analysis (ISA) and the Safety Analysis Report (SAR). The inspectors determined that the licensee is operating safely and in compliance with requirements.

The inspectors determined that licensee's administrative controls were implemented and communicated. The inspectors reviewed the Operating Requirements Manual (ORM) that limits moderator mass in heeled 30B cylinders containing enriched uranic material by limiting cylinder vapor pressure and heel weight and determined that required actions as identified in the ISA Summary and SAR have been correctly transcribed into written operating procedures. The inspectors evaluated the procedures' contents with respect to operating limits and operator responses for upset conditions and verified that actions needed to assure safety are adequately described in the procedures.

The inspectors interviewed and observed operators responsible for handling UF₆ cylinders throughout the Product System in order to determine that they were adequately implementing the required safety controls and that they were adhering to applicable safety procedures. The inspectors reviewed the procedures applicable to the tasks being observed and determined that these operator aids were current, reflected safety controls, and were followed by the operators.

Through interviews and document reviews, the inspectors verified that the licensee conducted self-assessments, audits, and period surveillances as required by the ISA Summary and SAR. The inspectors reviewed a selection of corrective action program (CAP) entries since the last Operational Safety inspection and determined that the licensee was identifying operational safety problems at an appropriate threshold and entering them into the CAP system. The inspectors also reviewed operator training records related to administrative IROFS.

b. Conclusion

No findings of significance were identified.

2. Nuclear Criticality Safety (IP 88015)

a. Inspection Scope and Observations

The inspector evaluated the adequacy of the licensee's nuclear criticality safety (NCS) program and analyses to assure the safety of fissile material operations. The inspectors reviewed selected NCS documents to verify whether the criticality safety of risk significant operations was assured through sufficient engineered and administrative controls, whether the approved subcritical margin was maintained, and whether the program was carried out by properly trained and qualified personnel. The NCS analyses demonstrated adequate identification and control of criticality hazards to assure operations within subcritical limits through appropriate limits on controlled parameters. The inspectors conducted discussions and interviews with the NCS manager, four members of the ISA/NCS plant engineering group, and operators about the NCS program. The inspectors reviewed aspects of selected NCS-related IROFS, including IROFS 16a, 16e, 16f, and C22.

The inspectors interviewed NCS staff, observed a weekly walk-down of SBM-1005, and reviewed aspects of the procedures, commitments, and records for weekly walk-downs (NCSIs), annual audits, and annual self-assessments to verify that the licensee is meeting its commitments as identified in the SAR. The inspectors interviewed licensee engineers and technicians about the criticality incident detection alarm system (CIDAS), reviewed CIDAS-related CAP entries, reviewed construction and facility changes potentially impacting CIDAS coverage, reviewed detector placement coverage, and reviewed CIDAS-related aspects of the licensee's emergency plan. The inspectors observed that no changes were made to detector placement or evacuation and muster locations.

The inspectors performed a plant walk-down of the small component decontamination train, multi-function decontamination train, liquid effluent collection and transfer system, and SBM-1005. The inspectors interviewed NCS engineers and operations staff before and during walk-downs to confirm that NCS-related controls were installed or being implemented in a way that performs the safety function specified in the associated NCS evaluation or analysis and are adequate to ensure safety.

The inspectors reviewed a recently conducted external assessment of the licensee's NCS program.

b. Conclusion

No findings of significance were identified.

B. Facility Support

1. Plant Modifications (IP 88070)

a. Inspection Scope and Observations

The inspectors interviewed three of the managers and staff involved in the licensee's configuration control processes, and reviewed a number of configuration control

procedures and records to verify that the licensee has established an effective configuration control system to evaluate, implement, and track permanent plant modifications (PPMs) to the site which could affect safety.

The inspectors verified that the licensee's work control program had provisions to ensure the adequate pre-job planning and preparation of PPM design packages. The configuration management system had adequate provisions to ensure that PPMs did not degrade the performance capabilities of IROFS or other safety controls that are part of the safety design basis.

The inspectors reviewed selected completed design packages for accuracy, including a selection of Quality Level 1 (QL-1) design packages completed since the last PPM inspection, to ensure the as-built design installations were in conformance with the design drawings and project procedures. The inspectors verified that applicable post maintenance installation and testing requirements were adequately identified and performed prior to implementation of PPM design packages. Completed modifications were adequately reviewed prior to implementation and before returning affected equipment to service. The inspectors reviewed a sample of minor modifications to ensure that they were categorized appropriately and did not involve QL-1 activities.

The inspectors verified that the licensee addressed the baseline design criteria stipulated in Title 10 of the *Code of Federal Regulations* (10 CFR) Section 70.64, such as fire protection and criticality control, in the designs of PPMs.

The inspectors verified that the licensee addressed the impacts of modifications to the ISAs, ISA Summary, and other safety program information developed in accordance with 10 CFR 70.62. Also, the inspectors verified that the licensee adequately categorized the evaluated changes and performed all the necessary reviews. The review of changes to the SAR is discussed below in section C.1.

The inspectors reviewed the "2015 Third Quarter Trend Reports," dated December 4, 2015, and a sample of the plant modification related events in the licensee's CAP. The inspectors verified that issues relating to the preparation and installation of PPMs actions were entered into the CAP, and that corrective actions were being assigned and tracked for these events in the CAP. The inspectors reviewed a sample of the completed corrective actions to verify that they were adequate.

b. Conclusion

No findings of significance were identified.

2. Emergency Preparedness (IP 88050)

a. Inspection Scope and Observations

The inspectors interviewed staff and reviewed records and determined that any changes made to the Emergency Plan or within the facility had been properly coordinated within the Emergency Preparedness (EP) program. The inspectors reviewed procedures with significant revisions since the last EP inspection and determined that the changes were in compliance with the Emergency Plan. The inspectors discussed the licensee emergency call list and verified that the list was current.

The inspectors reviewed training records and interviewed licensee staff regarding emergency preparedness training in the past year. The inspectors determined that the EP requirements were in compliance with the Emergency Plan. The inspectors verified that the licensee provided training for their personnel and emergency equipment as required by the Emergency Plan and that the individuals responsible for utilizing the equipment were qualified. The inspectors verified that the licensee provided training to hypothetical emergency situations which were effective and consistent with the frequency and performance objectives required in the Emergency Plan.

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 agreements. The inspectors interviewed Eunice Police Department, Eunice Fire and Rescue, and Lea County Sheriff Department representatives and determined that they maintained an adequate understanding of the written agreements. The inspectors 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 appropriate. 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 emergency equipment in the Emergency Operations Center (EOC) and the alternate EOC and verified that the inventory levels were maintained as required by the Emergency Plan. The inspectors toured the EOC and the alternate EOC 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 verified that any problems or deficiencies associated with the Emergency Plan were corrected. The inspectors reviewed the self assessments generated since the last inspection and verified that a system was in place for adequately tracking and resolving self-assessment findings.

One instance of failure to meet NRC requirements was self-identified by the licensee.

Introduction: A self-revealing violation of the LES license was identified when power was lost to the radio base stations in the Control Room and in the EOC following a loss of offsite power. Section 10.g of the License Application states, in part, "The licensee shall conduct authorized activities at the Nuclear Enrichment Facility (NEF) in accordance with the Emergency Plan."

Description: On April 14, 2015, during an accidental power outage, all equipment in the EOC powered down except for the emergency lights. It was previously believed that the EOC was powered via emergency power. Following the loss of power, it was later determined that actual power to the EOC was from normal (non-diesel backup) power. Section 6.2.1.3 of the Emergency Plan states, "The radio base stations are powered by diesel-backed AC sources and remain operative following a loss of offsite power." Additionally, the radio base station located in the Control Room also lost power during this event. The licensee took the immediate corrective action to power the radio base stations from a diesel-backed AC source and provided an uninterruptible power supply (UPS) to restore operability.

Analysis: The failure to follow a license requirement for powering radio base stations from diesel-backed AC sources was a performance deficiency and a violation of NRC requirements. The issue was more than minor because it involved the loss of capability of the radio base stations during an actual loss of offsite power. The potential safety impact would be the loss of communications with offsite agencies if an emergency declaration was made.

Enforcement: Section 10.g of the License Application states, in part, “The licensee shall conduct authorized activities at the Nuclear Enrichment Facility (NEF) in accordance with the Emergency Plan.” The Emergency Plan, section 6.2.1.3, states in part, “The radio base stations maintained onsite are powered by diesel-backed AC sources and remain operable following loss of offsite power.” Contrary to the above, the onsite radio base stations lost power during an actual loss of offsite power. As a result, the licensee failed to meet the requirements of their license application. The licensee entered the issue into their CAP as event report EV-102478. The licensee’s immediate correction actions were to provide an UPS for the radio base stations and made provisions to power the base stations from a diesel-backed AC source. Additionally, an engineering modification was initiated to power the EOC and the Control Room radio base stations from a diesel-backed AC source.

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 provide diesel-backed AC power to onsite radio base stations is a SL IV violation (VIO) of NRC requirements in accordance with the NRC Enforcement Policy Section 6.13.d.1. In accordance with Section 2.3.2.b of the Enforcement Policy, this violation will be dispositioned as a Non-Cited Violation (NCV) due to being self-identified, entered in the corrective action program and compliance restored, non-repetitive and not willful. This violation will be opened and closed as NCV 70-3103/2015-005-01, “Loss of Power to Radio Base Stations.”

b. Conclusion

One NCV of NRC requirements was identified. This NCV is being tracked as NCV 2015-005-01.

3. Evaluation of Exercises and Drills (IP 88051)

a. Inspection Scope and Observations

The inspectors reviewed the emergency drill scenario and discussed the exercise objectives with licensee personnel before the exercise. The inspectors walked down the plant to assess the effectiveness of the visual aids used in the drill and verified that the licensee had not pre-staged equipment in anticipation of the exercise.

The inspectors observed and evaluated the licensee’s graded biennial exercise conducted on October 14, 2015. The scenario included a simulated tornado impacting buildings and equipment resulting in a breached UF₆ cylinder in combination with a diesel fire from a cylinder transport vehicle. Personnel injuries were simulated, requiring offsite medical, fire, and hazardous material response assistance.

At the initiation of the emergency drill, the inspectors verified that the licensee assessed the accident scene, analyzed the plant condition, and classified the event. The event was initially classified as an alert and escalated to a site area emergency classification in accordance with the Emergency Plan. The inspectors observed the activation of the EOC and noted that all required positions were fully staffed in accordance with the Emergency Plan. The inspectors verified that the protective action recommendations implemented by the EOC were appropriate for the accident scenario and in accordance with the Emergency Plan.

The inspectors verified that the initial offsite notifications were within the time period specified in the Emergency Plan and were adequate in content. The inspectors verified that the onsite communications to the occupational workers were consistent with the protective action recommendations implemented by the EOC. The occupational workers participated in the shelter-in-place protective action and conducted personnel accountability in accordance with approved procedures. The inspectors reviewed the press releases provided by the Joint Information Center communicators. The inspectors determined that the press releases were approved by the Emergency Director (ED) prior to issuance and were in accordance with the Emergency Plan.

The inspectors determined that the ED maintained adequate command and control of the EOC. The inspectors reviewed the offsite dose assessment conducted by the dose assessor using the Rascal software. The inspectors verified that the ED utilized the dose assessment, radiation survey results, and environmental monitoring results during the assessment of the accident scenario.

The inspectors observed members of the licensee's emergency response team assemble at the designated assembly area and the arrival of the off-site emergency responders including fire, EMT, police, and HAZMAT. The inspectors observed the emergency response team's assessment of the affected area to include injured personnel and hazard analysis and response to additional emerging situations. The inspectors observed activities of the Incident Commander and the coordination of activities of the emergency response team and off-site emergency responders.

The inspectors observed the staff critiques of the emergency exercise. The inspectors determined that the critiques were effective at identifying deficiencies and areas for improvement. The inspectors verified that the licensee initiated documentation of items discussed after the emergency exercise in the CAP.

b. Conclusion

No violations of NRC requirements were identified.

C. Other Areas

1. Follow-up on Previously Identified Issues

a. URI 70-3103/2014-005-01: Criteria for Changes to Licensing Basis Documents

In 2014, the NRC opened an URI to obtain additional information related to the licensee's programs for managing changes to licensing basis documents. License Condition (LC) 30 allows for changes that do not result in a decrease in effectiveness of

safety commitments to be made by the licensee without prior NRC approval. Section b.3 of LC-30 requires that changes to the SAR that do result in a decrease in effectiveness to be submitted to the NRC for review and approval. As a follow-up to this URI, the NRC reviewed additional changes to licensing basis documents during a routine inspection in May 2015, to determine if the licensee was adequately implementing their change management programs in accordance with LC-30. This review was primarily focused on changes associated with NCS and structural design. The details of this review are documented in NRC Inspection Report 70-3103/2015-003. As a result of this review, the NRC concluded that the licensee adequately implemented their change management programs including changes to the SAR through LC-30; however, the URI remained open in order for the NRC to conduct a more detailed review.

As additional follow-up to the URI, the inspectors reviewed changes to the SAR that have been made by the licensee per LC-30 in the last year. The inspectors did not identify any changes that constituted a decrease in effectiveness.

LC-30 also requires that the licensee maintain records of changes to the SAR, including technical justification and management approval. Additionally, LC-30 requires the licensee to submit to the NRC a periodic report containing a description of each LC-30 change, and appropriate revised sections to the SAR, every six months. The inspectors reviewed records of LC-30 changes from the past year and determined that the licensee adequately maintains records of each change, including technical justification and management approval. The inspectors reviewed the most recent periodic report submitted to the NRC and determined that the licensee submits all required documentation. Inspectors will continue to sample and review SAR changes made per LC-30 in future inspections, as appropriate.

The inspectors had previously noted that the licensee made a number of changes to their environmental report using a process that is based on 10 CFR 51.22 and noted that 10 CFR 51.22 is a process normally used by the Commission, not the licensee, to determine if an action can be exempted from an environmental review. Upon further review it was determined that LC-10 states that the licensee is to "conduct authorized activities... in accordance with... 10 CFR 51.22..." Therefore, no violation of the license was identified.

This item is considered closed.

b. Event Notification 51593

On December 8, 2015, a 24-hour report was made to the NRC in accordance with 10 CFR 70.50(b)(2) for an inoperable sole IROFS associated with the UBC crane. This IROFS was designed to mitigate the consequences of an UF₆ release to meet 10 CFR 70.61 performance requirements. The IROFS was inoperable since the crane went into operation in March 2015. During the time period in which the crane went into operation and discovery of the inoperability, no design basis accidents occurred, thus there were no actual consequences. The crane was moved to a safe position in order to perform repairs (away from licensed material) and locked in place, thereby removing applicability of the IROFS. LES entered this condition into their CAP and a root cause analysis and extent of condition was commenced. LES will provide the NRC with a follow-up event response report within 60 days of the initial report as required by 10 CFR 70.50(c)(2).

D. Exit Meeting

The inspection scope and results were presented to members of the licensee's staff at various meetings throughout the inspection period and were summarized on October 15 and December 10, 2015, to Amy Johnson and 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

<u>Name</u>	<u>Title</u>
J. Sanford	Emergency Preparedness Manager
B. Veach	Emergency Preparedness
S. Cowne	Head of Compliance
M. Graham	Engineering Supervisor
B. Wood	Maintenance
J. Britt	Operations
A. Johnson	Licensing and Performance Assessment Manager
W. Padgett	Plant Engineering
J. Laughlin	Head of Operations and Chief Nuclear Officer
Q. Newell	ISA/NCS
S. Magill	Maintenance Manager
A. Bridges	ISA/NCS
R. Medina	Licensing Engineer
A. Riedy	ISA/NCS
J. Rickman	Licensing Specialist
J. Sanford	Emergency Preparedness Manager
A. McGee	ISA/NCS
S. Scott	Plant Engineering Manager
J. Dahlin	Health and Safety Manager
C. Slama	Licensing Project Manager

2. LIST OF ITEMS OPENED, CLOSED, AND DISCUSSED

Closed

70-3103/2015-005-01	NCV	Loss Of Power To Radio Base Stations (Paragraph B.2)
70-3103/2014-005-01	URI	"Criteria For Changes To Licensing Basis Documents" (Paragraph C.1)

Discussed

EN 51593	EN	Inoperable sole IROFS associated with the UBC crane (Paragraph C.1)
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3. INSPECTION PROCEDURES USED

88050	Emergency Preparedness
88020	Operational Safety
88051	Evaluation of Exercises and Drills
88015	Nuclear Criticality Safety
88070	Plant Modifications

4. DOCUMENTS REVIEWED

Records:

Maintenance Work Order Number 1000155673
 Maintenance Work Order Number 1000170800
 Maintenance Work Order Number 1000171042
 Maintenance Work Order Number 1000177725
 Maintenance Work Order Number 1000184080
 Maintenance Work Order Number 1000184192
 Maintenance Work Order Number 1000213413
 Maintenance Work Order Number 1000213414
 OSIROFSQC00100, Items Relied on for Safety (IROFS) and Operating Requirements Manual (ORM), Revision (Rev.) 01, dated December 14, 2013
 OP-3-0420-01-F-2, Large Assay Sample Data Form, Rev. 25, dated February 15, 2014
 TQ-3-0100-12-F-6, Training Guidelines: Certification/Evaluation Form, dated July 28, 2015
 CR-2014-052, Rev. 0
 CR-2014-122, Rev. 0
 CR-2014-137, Rev. 0
 CR-2014-149, Rev. 0
 CR-2014-151, Rev. 0
 CR-2015-137, Rev. 0
 CC-EG-2013-144, "Safe-by-Design Verifications for Cascades," Rev. 0
 CC-LCO-2012-03, "Contingency 30B Cylinder Storage," Rev. 1
 CC-OP-2014-03, "Changing the boundary of IROFS16a in order to track no introduction of moderator to a heeled cylinder," Rev. 0
 CC-OP-2014-04, "Revision 6 of NEF-BD-50g with Associated Change to ORM 3600-30," Rev. 0
 CC-OP-2014-05, "Changing the boundary of IROFS16a and adding IROFS16e and IROFS16f to support the process of releasing heeled 30B cylinder for Operations use," Rev. 1
 DCN-2013-04, "Install a Penetration in South Wall of ICC," dated May 30, 2013
 DCN-2014-04, "Replacement of IROFS11 and IROFS12 Terminal Lugs," Rev. 0
 ECR-9266A, "UF₆ Handling Area Roof HVAC Fire Dampers"
 ECR-9017, "Revise LES-1001-E-EQP-001-10 to show correct IROFS boundary"
 ISA-MEM-039, "ISA Team Meeting for SBM Process Systems HAZOP and Risk Determination Analysis (Feed/Product/Tails)," Rev. 4
 Tektronix Certificate of Calibration 9568464, dated January 26, 2015
 Tektronix Certificate of Calibration 979944, dated March 25, 2015
 Work Plan: 1101-ELEC-641-001, "ICC Liquid Nitrogen Skid Electrical Modifications," dated May 15, 2013
 WO 1000131706, "1Y: Autoclave IROFS 11 and 12"
 WO 1000142018, "SBM1: IROFS12 Autoclave #1 (PMP) (P)"
 WO 1000144647, "SMB1: Autoclave #3 IROFS12 (PMP) (P)"
 WO 1000144808, "SMB1: Autoclave #1 IROFS 11 (PMP) (P)"
 WO 1000144809, "SMB1: Autoclave #3 IROFS 11 (PMP) (P)"
 WO 1000223149, "CRDB: Torque IROFS43 Terminals"
 WO 1000206703, "1Y: IROFS43 Surveillance"
 WO 1000206847, "1Y: IROFS43 Surveillance"
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NEF-BD-24c, Administrative Establishment of Airflow Away from the Worker, Rev. 1

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