



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

January 26, 2016

Mr. Adam Hilton  
FMO Facility Manager  
Global Nuclear Fuel – Americas, L.L.C.  
P.O. Box 780, Mail Code J20  
Wilmington, NC 28402

**SUBJECT: GLOBAL NUCLEAR FUEL – AMERICAS, L.L.C. – U.S. NUCLEAR REGULATORY  
COMMISSION INTEGRATED INSPECTION REPORT 70-1113/2015-005**

Dear Mr. Hilton:

The Nuclear Regulatory Commission (NRC) conducted announced inspections during the fourth quarter of calendar year 2015 (October 1 - December 31, 2015), at the Global Nuclear Fuel – Americas, L.L.C. Facility in Wilmington, NC. The purpose of the inspections was to review the implementation of programs and procedures for nuclear criticality safety, plant modifications, operational safety and emergency preparedness exercises and drills. The reviews conducted helped to determine that licensed activities were conducted safely and in accordance with NRC requirements. The enclosed report presents the results of these inspections. At the conclusion of these inspections, the inspectors discussed the results with you and members of your staff at exit meetings on October 13 and November 19, 2015.

During the inspections, the staff examined activities conducted under your license as they relate to safety and 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 plant observations. Throughout the inspections, observations were discussed with your managers and staff. Based on the results of these inspections, no violations 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 the 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); accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>.

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. 70-1113  
License No. SNM-1097

Enclosure:  
NRC Inspection Report 70-1113/2015-005  
w/Supplemental Information

cc:  
Scott Murray, Manager  
Facility Licensing  
Global Nuclear Fuels – Americas, L.L.C.  
Electronic Mail Distribution

W. Lee Cox, III, Chief  
North Carolina Department of Health and Human Services  
Division of Health Service Regulation  
Radiation Protection Section  
Electronic Mail Distribution

If you have any questions, please call me at 404-997-6509.

Sincerely,

**/RA/**

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**DISTRIBUTION:**

R. Johnson, NMSS  
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DATE	1/20/2016	1/11/2016	1/13/2016	1/11/2016	1/11/2016	1/20/2016	1/13/2016	1/11/2016
E-MAIL COPY	YES NO	YES NO	YES NO	YES NO	YES NO	YES NO	YES NO	YES NO

U.S. NUCLEAR REGULATORY COMMISSION  
REGION II

Docket No.: 70-1113

License No.: SNM-1097

Report No.: 70-1113/2015-005

Licensee: Global Nuclear Fuel - Americas, LLC

Location: Wilmington, North Carolina 28402

Dates: October 1 through December 31, 2015

Inspectors: B. Adkins, Senior Fuel Facility Inspector (Section B.1)  
M. Crespo, Senior Fuel Facility Inspector (Section B.2)  
D. Hartland, Senior Fuel Facility Inspector (Section B.2)  
P Glenn, Fuel Facility Inspector (Section A.2)  
K. Kirchbaum, Fuel Facility Inspector (Section B.2)  
N. Morgan, Fuel Facility Inspector (Section A.1)  
C. Rivera, Fuel Facility Inspector (Section B.1)  
T. Sippel, Fuel Facility Inspector (Section A.1)

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

Enclosure

## **EXECUTIVE SUMMARY**

Global Nuclear Fuel - Americas, LLC  
NRC Integrated Inspection Report Nos. 70-1113/2015-005  
October 1 through December 31, 2015

NRC regional inspectors conducted inspections during normal shifts in the areas of criticality safety, plant modifications, operations and emergency preparedness exercises and drills. During the inspection period, normal production activities were ongoing. These announced, routine inspections consisted of a selective examination of procedures and representative records, observations of activities, walk-downs of items relied on for safety (IROFS), and interviews with licensee personnel. There were no safety significant findings identified during these inspections.

### **Safety Operations**

- The IROFS 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 application and regulatory requirements. (Paragraph A.2)

### **Facility Support**

- The licensee adequately implemented a configuration management system to evaluate, implement, and track plant modifications which could affect safety. (Paragraph B.1)
- The graded biennial emergency drill was implemented in accordance with the Emergency Plan, License Application, and applicable regulatory requirements. (Paragraph B.2)

### **Attachment**

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

## REPORT DETAILS

### Summary of Plant Status

Global Nuclear Fuel – Americas (GNF-A), LLC manufactures uranium dioxide (UO<sub>2</sub>) powder, pellets, and light water reactor fuel bundles at its Wilmington, NC facility. The facility converts uranium hexafluoride (UF<sub>6</sub>) to UO<sub>2</sub> using a Dry Conversion Process (DCP) and performs UO<sub>2</sub>, gadolinium pellet and fuel fabrication operations. During the inspection period, normal production activities were ongoing.

#### A. Safety Operations

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

###### a. Inspection Scope and Observations

The inspectors reviewed the licensee's Integrated Safety Analysis (ISA) Summary and material license and License Application for the Radioactive Waste (Radwaste) and DCP vaporization process areas. The inspectors walked down the systems; observed routine plant operations, shift turnovers, and housekeeping; interviewed control room operators; and attended daily operations meetings. The inspectors also reviewed Operating Procedures (OPs), calibration records, Functional Test Instructions (FTIs), training and qualification records, and other records associated with selected items relied on for safety (IROFS) in these areas. The inspectors reviewed two administrative IROFS in the area of sump design and operation, one passive engineered IROFS related to sump safe geometry, and eight active engineered IROFS covering various tank radiation monitors and process shutdown interlocks. The inspectors determined that the 11 IROFS inspected were adequately implemented as described in the licensee's ISA.

The inspectors verified the physical presence of the selected passive and active engineered safety controls, evaluated the safety controls to determine their capability and operability, and verified that the controls credited with limiting the risk of potential accident scenarios were capable of preventing or mitigating the scenarios. The inspectors confirmed that engineered controls were present and capable of performing their intended safety functions for the areas inspected.

The inspectors determined that licensee's administrative controls were implemented and communicated. The inspectors reviewed OP-1331.00, "DCP Vaporization," OP-1339.01, "NPC Powder Pack," OP-1910, "FMO RAD Waste Process Operation," and determined that required actions as identified in the ISA Summary were 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 limits needed to assure safety were described in the procedures.

The inspectors interviewed seven operators and determined that operators and technicians were adequately implementing the required safety controls and adhering to applicable safety procedures. The inspectors reviewed selected postings and operator aids in DCP Vaporization and Radwaste and determined that these postings and operator aids were current, reflect safety controls, and were followed by the operators.

Through interviews and document reviews, the inspectors verified that the licensee adequately conducted calibrations, and periodic surveillances as required by the ISA Summary for selected IROFS.

The inspectors reviewed the licensee's corrective action program entries for the past 12 months and determined that deviations from procedures and unforeseen process changes affecting nuclear criticality, chemical, radiological, or fire safety were documented and investigated promptly. In addition, the inspectors evaluated the corrective actions associated with selected Condition Reports (CRs) and determined that the completed corrective actions were adequate.

b. Conclusion

No violations of significance were identified.

2. Nuclear Criticality Safety (NCS) (IP 88015)

a. Inspection Scope and Observations

The inspectors evaluated the adequacy of the licensee's NCS program and analyses to determine the safety of fissile material operations through compliance with 10 CFR 70 and license requirements. The inspectors reviewed selected NCS documents to verify that criticality safety of risk-significant operations was assured through engineered and administrative controls with adequate safety margin, and reviewed by qualified staff. The inspectors also reviewed a sample of NCS analysis and aspects of selected NCS-related IROFS in Node Group 702 (Radwaste) and 704 (Incinerator). The inspectors verified that the performance requirements were met for selected accident sequences and the NCS analyses demonstrated adequate identification and control of NCS hazards. The inspectors interviewed three criticality safety engineers, two area engineers, three managers, and multiple operators regarding operations, equipment, and controls and verified that administrative controls were implemented.

The inspectors reviewed procedures and license requirements for weekly NCS audits. Through interviews and observing personal conduct audits, the inspectors verified that the licensee was complying with associated requirements. The inspectors reviewed results of selected NCS audits completed since the last NCS inspection to confirm that safety-related issues were identified and resolved as required. The inspectors noted qualified NCS engineers with knowledge of the applicable NCS analysis and controls conducted the audits. The inspectors also noted that the audits identified NCS infractions as required. Additionally, the inspectors verified that NCS engineers reviewed plant operations for compliance with license requirements, procedures, and postings and examined equipment and operations to determine that past NCS evaluations remained current and met requirements. The inspectors confirmed that deficiencies identified during audits were entered into the licensee's corrective actions program and addressed as required.

The inspectors reviewed the licensee's response to recent internally-reported events that occurred between April and October 2015. The inspectors interviewed licensee staff and observed that the events were both investigated and captured in the licensee's corrective action program in accordance with procedures. The inspectors verified that corrective actions were assigned and tracked as required.

The inspectors performed independent plant walk-downs of Radwaste and the incinerator to verify that risk-significant fissile material operations were conducted safely and in accordance with regulatory requirements. The inspectors interviewed operations staff and NCS engineers as appropriate before and during walk downs. Controls identified in NCS analyses were verified to be installed or implemented and were adequate to ensure safety.

b. Conclusion

No violations of significance were identified.

B. Facility Support

1. Plant Modifications (IP 88070)

a. Inspection Scope and Observations

The inspectors interviewed engineers, operators, support personnel, and managers to verify that that the licensee has established an effective configuration management system to evaluate, implement, and track plant modifications (PMs) which could affect safety.

The inspectors verified that the licensee's work control program had provisions to ensure adequate pre-job planning and preparation of PM design packages. The inspectors determined that the configuration management system had adequate provisions to ensure that PMs did not degrade the performance capabilities of IROFS or other safety controls that are part of the safety design basis. The inspectors reviewed PM program procedures since the last inspection to determine if changes were consistent with license requirements including specific requirements related to configuration management.

The inspectors reviewed PM design packages completed since the last PM inspection to ensure that as-built design installations were in conformance with the design documents and project procedures. Specifically, the inspector's reviewed the following change packages: #11936, Modify H2 System for the Dry Conversion Process (DCP) Conversion Lines, #13415, Reduction of PM Frequency for all DCP H2 Detectors, #13640, HF Vapor/Liquid Separator and Level Switch Functional Equivalent, #13682, Update ISA Summary Documents to Reflect New DCP Hydrogen System, and #14153, IROFS 803/804 Sole IROFS Elimination (Duct Design/Monitoring).

The inspectors verified that the licensee addressed potential impacts of modifications to the ISA, ISA Summary, and other safety program information developed in accordance with 10 CFR 70.62. The inspectors reviewed 10 CFR 70.72 evaluations to verify that the licensee adequately assessed whether or not NRC pre-approval of the change was required prior to implementation.

The inspectors conducted walk downs to verify that field installations matched as-built design drawings. The inspectors reviewed PM packages to determine if they received proper interdisciplinary reviews by impacted work groups prior to approval and that applicable post-maintenance installation and testing requirements were adequately identified and performed. The inspectors reviewed minor modifications to ensure that they were categorized appropriately and did not involve safety-related activities.



The inspectors assessed the implementation of management measures programs as required by 10 CFR 70.62(d). In the area of training and qualification, the inspectors verified that personnel performing ISA reviews and 10 CFR 70.72 evaluations were qualified to perform their assigned duties. Also in the area of training, the inspectors reviewed operator training records to determine if operators were trained on safety-related modifications prior to authorizing plant operations. With regards to records, the inspectors verified that the licensee maintained records of modifications and supporting documents in accordance with NRC regulations and license application commitments. In the area of design requirements, the inspectors verified that plant design requirements and specifications were clearly established and maintained as controlled information. With respect to functional testing, the inspectors reviewed post-modification test plans and records to verify that the testing adequately tested the safety function of IROFS and safety-related equipment.

The inspectors reviewed the licensee's problem identification and resolution program to verify that issues relating to the preparation and installation of plant modifications were entered into the corrective action program (CAP) and the adequacy of corrective actions.

b. Conclusion

No violations of significance were identified.

2. 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 during 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 13, 2015. The scenario included a credible airborne threat reported from the NRC Headquarters Operation Officer (HOO). The airborne threat was a small aircraft containing explosives with the intent of crashing into the site. The airborne threat was eliminated and this resulted in a fire outside of the Controlled Access Area (CAA). The Emergency Response Team (ERT) then responded to the fire. Coincident with the airborne threat, the Emergency Organization (EO) was required to respond to a contaminated, injured person with a compound, leg fracture. Once the injured person was loaded into the ambulance, the scenario then had the ambulance involved in an accident offsite. The offsite part of the drill was not evaluated as part of the inspection.

At the initiation of the emergency drill, the inspectors verified that the licensee assessed the accident scenario, analyzed the plant conditions, and adequately classified the event. The event was initially classified as an Off Normal condition and later elevated to an Alert in accordance with the Emergency Plan. The inspectors observed the activation of the Emergency Operations Center (EOC) and the EO and noted that all required positions were fully staffed. The necessary personnel were dispatched to scenes 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 contained the required information.

The inspectors verified that the onsite communications to the onsite plant personnel were consistent with the Protective Action Recommendations (PARs) implemented by the EOC and EO. The licensee staff participated in an accountability muster and then a shelter-in-place protective action in accordance with approved procedures. The inspectors determined that the Emergency Director (ED) maintained adequate command and control of the EOC.

The inspectors observed members of the licensee's ERT assemble at the designated assembly area and the arrival of the off-site emergency responders including the licensee's fire responders. The inspectors observed the ERT's activities for the injured victim including radiological surveys of the victim prior to transport to off-site medical facilities, the assessment of the affected area, and response to additional emerging situations. The Incident Commander, Fire Brigade Officer, Area and Building Managers maintained adequate command and control of the emergency response team and coordinated action with the off-site emergency responders. The inspectors verified that the emergency response team activities were appropriate for the exercise scenario and were adequate in meeting the drill objectives.

The inspectors observed the staff critiques of the emergency exercise. The inspectors determined that the critiques were effective at identifying lessons learned and areas of improvement. The inspectors verified that the licensee documented items discussed after the emergency exercise in the CAP via the 2015 Biennial Evaluated Exercise Report.

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 various meetings throughout the inspection period and were summarized on October 13 and November 19, 2015, to A. Hilton 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>
Beaty, F.	PP &SS Area Engineer
Davidson, S	Fire Protection Engineer
DeGloyer, J	ISA Projects
Dodds, M.	Sr. Criticality Safety Engineer
Eghbali, D.	Criticality Safety Engineer
Gaul, M.	ISA Engineer
Hilton, A.	FMO Operations Leader & Facility Manager
Humphreys, A	Training, Manager
LaChance, P	FMO Maintenance Manager
Latham, U.	Sr. Admin Specialist, Licensing
Murray, S	Manager, Licensing
Nay, D.	FMO Manufacturing Engineering Manager
Ollis, P.	Licensing Engineer, Licensing and Liabilities
Paulson, L	Sr. Criticality Safety Analysis
Reeves, J.	Manager, Integrated Safety Analysis
Rohner, J.	Manager, Criticality Safety Program
Saito, E.	Nuclear Safety Manager
Venters, M.	Emergency Preparedness Manager

### **2. LIST OF ITEMS OPENED, CLOSED, AND DISCUSSED**

None

### **3. INSPECTION PROCEDURES USED**

88015	Nuclear Criticality Safety
88020	Operational Safety
88051	Evaluation of Emergency Exercise
88070	Plant Modifications

### **4. DOCUMENTS REVIEWED**

#### Records:

FTI 201-05, Vaporization Autoclave Leak Detection System, Revision (Rev. 0), performed November 12, 2015

FTI 1331-10, Detection of HF Vapors in Vaporization Room Turn on Horn, Lights, and Console Alarm, Turn off Heaters, and Close Autoclave and Cold Trap Valves, Rev. 3

FTIs 1930.01 to 1930.10 (For IROFS 702-20 and 702-21)

FTI 1331-03a

QRA-702/703, Radwaste/Waste Treatment, Rev. 5

WO182779, Annual Calibration: Peak Verification U Monitor Modification to Procedure Requires NSE APP, dated August 10, 2015

WO183355, Semi Annual Calibration: Essential Calibration DT-262, SX Feed to V-262, V 264, dated August 31, 2015

Calibration WO Nos. 124282 and 125278

Radworker 1 Nuclear criticality Safety Training, 2015

Radworker 2 Nuclear Criticality Safety Training, 2015  
 CSA-301.01.001, Criticality Safety Analysis: DSR Furnace Output System and Vibromill,  
 Rev. 0  
 CSA-702.101013, "FMO Radwaste Filtration and Disposal," Rev. 2  
 CSA-702.130313, "FMO Radwaste Annular Vessels," Rev. 5  
 CSA-702.130313, "FMO Radwaste Permeate Tanks," Rev. 3  
 CSA-704.00-100, "Criticality Safety Analysis: Incinerator Building," Rev. 0  
 CSA-900.00.100, "Criticality Safety Analysis: "Safe Mass Limits for Uranium Systems,"  
 Rev. 1  
 CSA-900.00.03, "Criticality Safety Analysis: "Sintered Pellets," Rev. 0  
 CSA-1930.01, "Criticality Safety Analysis: Radwaste Slab Tanks T-7030/T-7040," Rev. 6  
 WI-18-104-02-F01, "Nuclear Safety Quarterly Audit Form," 2015 Quarter 3, completed  
 July – September 2015  
 Calibration Services Request Deletion Sheets for Hydrogen Monthly Calibrations, dated  
 June 5, 2014  
 Change Request #11936, Modify H2 System for DCP Conversion Lines  
 Change Request#13682, Update ISA Summary Documents to Reflect New DCP Hydrogen  
 System  
 Change Request #13415, Reduction of PM Frequency for All DCP H2 Detectors  
 Change Request #13640, HF Vapor Liquid Separator and Level Switch Functional  
 Equivalent  
 Change Request #14153, QRA-803/804 Sole IROFS Elimination (Duct Design/Monitoring)  
 Hydrogen Detector Annual Alarm Verification  
 HVAC Maintenance Survey Log  
 Quarterly Calibration Hydrogen Detector  
 Role Requirements Report for DCP Control Room Operators, dated November 18, 2015  
 Training/Qualification Records for ISA Reviewer M. Gaul

Procedures:

CP-20-107, MFO Training and Qualification Program, Rev. 4.1  
 Nuclear Safety Release/Requirements (NSR/R) 01.16.11  
 NSR/R 01.24.04  
 NRS/R 01.24.16  
 NSR/R 01.24.17  
 NSR/R 01.24.18  
 NSR/R 01.24.27  
 NSR/R 2.1.7  
 NSR/R 15.02.02, DCP Convert Vaporization, Rev. 10  
 OP-1331.00.100, DCP Vaporization – General Information, Rev. 5  
 OP-1331.00.201, DCP Vaporization – Pre-Startup, Rev. 1  
 OP-1331.00.203, DCP Vaporization – Autoclave Loading, Rev. 1  
 OP-1331.00.204, DCP Vaporization – Vaporization Process, Rev. 0  
 OP-1331.00.209, DCP Vaporization – Abnormal Operations, Rev. 0  
 OP-1331.00.210, DCP Vaporization – Alarm Response and emergency Operations, Rev. 4  
 OP-1339.01.100, NPC Powder Pack – General Information, Rev. 0  
 OP-1339.01.202, NPC Powder Pack – Normal Operations, Rev. 0  
 OP-1900, Rad Waste General, Rev. 20  
 OP-1910, FMO Rad Waste Process Operation, Rev. 6  
 OP-1922, FMO Rad Waste Filtration, Rev. 17  
 OP-1930, FMO Rad Waste Quarantine, Rev. 12  
 OP 1900, Radwaste General, Rev. 20  
 OP 1940.00, Laundry and Scrubber Surge System, Rev. 13

CP-17-103, Nuclear Safety Records, Rev. 1  
 CP-20-103, Nuclear Safety Training, Rev. 2  
 CP-27-104, Nuclear safety Assurance, Rev. 1.1.  
 WI-18-104-02, Internal Nuclear Safety Audits, Rev. 1  
 WI-27-104-03, Nuclear Safety Reviews, Rev. 0  
 WI-27-104-04, Nuclear Safety Design Criteria, Rev. 2  
 CP-27-114, Integrated Safety Analysis, Rev. 4  
 CSA 2310, Criticality Safety Analysis, Rev. 3  
 FTI 1332-13, Closing of the Hydrogen and UF6 Supply Valves and Providing Alarm to Control Room Operator if a Hydrogen Leak is Detected in the Conversion Room, Rev.5  
 FTI 132-13, Closing of the Hydrogen Supply Valve if a Hydrogen Leak is Detected in the Conversion Room, Rev. 4  
 OP #2301.00, FMO HVAC Maintenance Operation, Rev. 17  
 QRA-202, DCP-Conversion, Rev. 13  
 TD-803-03, HVAC Duct Design & Holdup Monitoring, Rev. 1  
 TD-803-10, HVAC Ductwork Inspection and Cleanout, Rev. 0  
 WI-27-105-25, Rev. 3,  
 WI-27-105-25-F04, GNFA/GLE HVAC Annual Survey Data Sheets, Rev. 0  
 WI-27-105-25-F06, GNFA/GLE HVAC Monthly Survey Data Sheets, Rev. 0  
 WI-27-105-25-F05, GNFA/GLE HVAC Quarterly Survey Data Sheets, Rev. 2  
 WI-16-106-01, GNF-A Change Management Process (CMP), Rev. 1.0  
 WI-16-106-02, Configuration Management Program-Nuclear Manufacturing Operations, Rev. 1  
 WI-06-100-22, CAA Operating Procedures, Rev. 0  
 WI-06-100-26, CAA Temporary Operating Procedures, Rev. 0.1

Condition Reports Written as a Result of the Inspection:

CR 17426, CR 17427, CR 17436

Condition Reports Reviewed:

CR 14571, CR 14695, CR 15121, CR 15636, CR 15274, CR 14572, CR 16599, CR 14695, CR 16006, CR 16005, CR 15995, CR 16969, CR 15892

Other Documents:

CP-20-107-F0x, Gad Automated Rod Load Operator Qualification Card, Rev. 0  
 TD-702-20, Quarantine Tank Uranium Monitor, Rev. 0  
 TD-702-21, Quarantine Tank Pipe Detector, Rev. 0  
 DCP Blend Pre-compact Granulate (BPG) and Second Floor Additive Make-up Qualification Card  
 P/N 1000006053, Shur-Shot X-Proof Hydrogen Fluoride Alarm Operations Manual, Rev. E  
 UM SITRPDS3-1, SITRANSP, Series DSIII Transmitter for Pressure, Differential Pressure, Flanged Level, and Absolute Pressure Model 7MF4\*33, Rev. 4  
 Criticality Safety Analysis 1331.01  
 DET-TRONICS Instructions 95-8444  
 Infiniti Gas Transmitter U9500  
 PHA 803, Rev. 3  
 QRA-803/804 HVAC, Rev. 7