

APR 06 2016

LES-16-00060-NRC

Attn: Document Control Desk
Director
Office of Nuclear Material Safety and Safeguards
U. S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Louisiana Energy Services, LLC
License Number: SNM-2010
NRC Docket Number: 70-3103

Subject: Retraction of Event Notification 51593

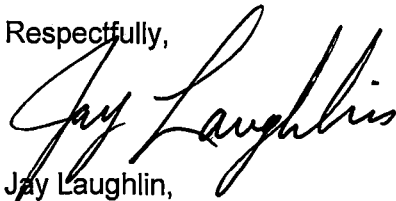
Reference: 1. Letter LES-16-00017-NRC, 60 Day Written Follow-up Report for Event Notification 51593, dated February 2, 2016.
2. Event Report Notification, submitted to NRC Operations Center on December 7, 2015

On December 7, 2015 twenty-four hour event notification report 51593 was submitted by Louisiana Energy Services, LLC dba URENCO USA (UUSA), to the NRC Operations Center in accordance with 10 CFR 70.74(a). As required by 10 CFR 70 Appendix A (b), on February 2, 2016 UUSA submitted a 60 day written follow-up report to the initial report.

As required by the UUSA Corrective Action Program, a Root Cause Evaluation (RCE) was completed for the reported condition. Additionally, it has been determined that existing design features of the UUSA UBC Pad Crane were capable of providing seismic restraint. UUSA engineering has completed additional analysis which demonstrates that the end-truck wheels, with axles and bearing housings, would have resisted the design basis loading for which the missing seismic bars were intended. Based on this engineering evaluation, summarized in Enclosure 1, it has been determined that although the IROFS was degraded, the missing QL1 seismic bars were not needed to meet the 10 CFR 70.61 performance requirements in the as found condition; as such Event Notification 51593 is hereby being retracted.

If you have any questions, please contact Salem Thyne, Licensing and Performance Assessment Manager, at 575-394-5252.

Respectfully,



Jay Laughlin,
Chief Nuclear Officer and Head of Operations

Enclosure: 1. Basis For Retraction

NM5520

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Enclosure 1

EN 51593 Basis for Retraction

Background

On December 7, 2015, while the UUSA UBC Pad Crane was out of service for maintenance, it was discovered that some of the IROFS27e basic components, which were designed to meet design basis seismic loading, were never installed. The missing components were seismic restraint shear bars which were intended to straddle the crane tracks and prevent lateral movement of the crane end-trucks during a seismic events.

As is documented the UUSA ISA Summary, the uncontrolled seismic accident sequence results in a high consequence chemical release event. Therefore, in accordance with the requirements in 10 CFR 70.61, the design of IROFS27e components ensures that they will prevent the accident sequence during both “unlikely” and a “not-unlikely” seismic events.

At the time of discovery, the crane had been in service for over six months. During that period, there was no engineering analysis or ISA Summary documentation that would support the ability to maintain a likelihood category of “highly unlikely” in the absence of the shear bars.

On December 8, 2015, with a lack of immediately available analysis and with no assurance that § 70.61 performance requirements were being met, UUSA conservatively, and in accordance with guidance provided in FCSS ISG-12, made a 24-hour event notification to the NRC Operations Center in accordance with § 70 Appendix A (b)(2).

The initial event notification was followed up by a 60 day written response on February 2, 2016. In the written response, UUSA noted that a root cause evaluation was in progress in UUSA’s corrective action program, and that completion of that evaluation would allow completion of the 60 day written response requirements. The written response concluded with UUSA committing to provide a follow-up submittal with the required information by April 8, 2016.

Description

After discovery, UUSA began working immediately with the vendor to analyze the conditions that existed in the six months during which the crane was in service with missing components. The included evaluating other design features which may be able to perform the safety function.

During the ongoing maintenance at the time of discovery, four wheels had been replaced on the end-trucks. These wheels were procured from a sub-vendor. The vendor reviewed the sub-vendors documentation and determined that the removed wheels and wheels still installed on the crane were from the same lots. Analysis of the removed wheels was performed, as a representative sample, and it was determined that the wheels would have resisted the seismic forces expecting in both the “not-unlikely” and in the “unlikely” design basis events. Therefore, the lateral movement failure mechanism would not have occurred and the performance requirements of a “highly unlikely” likelihood category for a high consequence event were still met during the period of degradation.

Conclusion

Based on this analysis, there is reasonable assurance that the end-truck wheels provided the safety function of the missing shear bars. As such, § 70.61 performance requirements were met at all times, and at no time was there any concern for safety.