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

April 15, 2016

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

SUBJECT: LOUISIANA ENERGY SERVICES, LLC, URENCO USA – NUCLEAR REGULATORY COMMISSION INTEGRATED INSPECTION REPORT 70-3103/2016-002

Dear Mr. Laughlin:

This letter refers to the inspections conducted from January 1 through March 31, 2016, at the Louisiana Energy Services, LLC, URENCO USA facility located in Eunice, New Mexico. The purpose of the inspections was to determine whether licensed activities were conducted safely and in accordance with Nuclear Regulatory Commission (NRC) requirements in the areas of Operational Safety, Nuclear Criticality Safety, and Maintenance and Surveillance of Safety Controls. The enclosed report presents the results of these inspections. At the conclusion of these inspections, the results were discussed with you and members of your staff at exit meetings on March 3 and March 31, 2016.

During the inspections, the NRC staff examined activities conducted under your license as they related to public health and safety, the common defense and security, and to confirm compliance with NRC 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 examination of selected procedures and representative records, observations of activities, and interviews with personnel.

Based on the results of these inspections, the NRC has determined that a Severity Level IV violation of NRC requirements occurred. Because this violation was entered into the licensee's NRC-approved corrective action program to restore compliance, it is being treated as a Non-Cited Violation (NCV), consistent with Section 2.3.2 of the NRC Enforcement Policy. The NCV is described in the attached inspection report. If you contest the violation or significance of the 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: the Regional Administrator, Region II and 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* 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 in the NRC's Agencywide Documents Access and Management System (ADAMS), accessible at http://www.nrc.gov/reading-rm/adams.html.

If you have any questions regarding this matter, please contact me at (404) 997-4629.

Sincerely,

/RA/

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

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

Enclosure:
Inspection Report No. 70-3103/2016-002
w/Attachment: Supplementary Information

cc: (See page 3)

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cc: (See page 3)

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OFFICE	RII:DFFI	RII:DFFI	RII:DFFI	RII:DFFI	RII:DFFI	DC
SIGNATURE	/RA/	/RA/	/RA/	/RA/	/RA/	/RA/
NAME	NMorgan	LPitts	GGoff	DAnderson	BAdkins	LPitts
DATE	4/11/2016	4/13/2016	4/12/2016	4/11/2016	4/11/2016	4/13/2016
E-MAIL COPY	**YES** NO	**YES** NO	**YES** NO	**YES** NO	**YES** NO	**YES** NO

OFFICIAL RECORD COPY DOCUMENT NAME: G:\DFFI\REPORTS\Draft inspection report folder\LES\2016-002\IR LES 2016-002.docx

cc:
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cc: (Cont'd on page 4)

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U. S. NUCLEAR REGULATORY COMMISSION
REGION II

Docket No:	70-3103
License:	SNM-2010
Report No:	70-3103/2016-002
Licensee:	Louisiana Energy Services, LLC
Facility:	URENCO USA
Location:	Eunice, NM
Inspection Dates:	January 1 through March 31, 2016
Inspectors:	B. Adkins, Senior Fuel Facility Inspector (Paragraph A.1) D. Anderson, Fuel Facility Inspector (Paragraph A.2) G. Goff, Fuel Facility Inspector (Paragraph B.1)
Approved:	M. Sykes, Chief Projects Branch 1 Division of Fuel Facility Inspection

Enclosure

EXECUTIVE SUMMARY

Louisiana Energy Services, LLC
URENCO USA
NRC Integrated Inspection Report 70-3103/2016-002
January 1 - March 31, 2016

Regional inspectors conducted announced inspections during normal shifts. The Nuclear Regulatory Commission (NRC) inspectors performed a selective examination of licensee activities 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. There was one non-cited, Severity Level IV violation identified.

Safety Operations

- The items relied on for safety (IROFSs) reviewed were properly implemented and maintained in order to perform their intended safety function. A non-cited, Severity Level IV violation of NRC requirements was identified for failure to evaluate a Safety Analysis Report change in accordance with License Condition 30. (Paragraph A.1)

- The Nuclear Criticality Safety program was implemented in accordance with the license and regulatory requirements and provided for adequate protection of public health and safety. (Paragraph A.2)

Facility Support

- The Maintenance and Surveillance of Safety Controls program for IROFS was implemented in accordance with the license 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 URENCO, USA facility (UUSA) enriches uranium hexafluoride using a gas centrifuge technology. During the inspection period, the licensee conducted routine plant operation of the operating cascades.

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 implementation of items relied on for safety (IROFS) C22 mass balance, decontamination of 1S sample bottles in the small component decontamination train (SCDT), and routine operations in the recycling area including the implementation of IROFS 54a/b. The inspectors determined that the specific safety controls reviewed were being adequately implemented and properly communicated as described in the Integrated Safety Analysis (ISA). The inspectors verified that the operators had an adequate understanding of the required safety controls. The inspectors determined that the licensee was operating the facility safely and in compliance with license requirements.

The inspectors reviewed a sampling of accident sequences in criticality safety, chemical safety, and fire safety to verify that licensee's design basis assumptions, features, and management measures reflected actual conditions in the field and that safety controls were available and reliable to perform their intended safety function. The inspectors verified that the risk indexing of specific accident sequences and IROFS was consistent with the established methodology described in the ISA Summary. The following accident sequences were reviewed: EC3-1, PB4-1, DS1-4, FF6-1, and VR2-7.

The inspectors confirmed that passive engineered controls were present and capable of performing their intended safety functions. To complete this confirmation, the inspectors verified the physical presence of passive safety controls to prevent the intrusion of moderator into the building (IROFS 27a/b), evaluated the safety controls to determine their capability and operability, and verified that potential accident scenarios were covered.

The inspectors determined that administrative controls were implemented and communicated. The inspectors reviewed various procedures associated with the IROFS C22 mass balance and decontamination operations in the SCDT 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 adequately described in the procedures.

The inspectors observed routine plant operations including connection and disconnection of cylinders from the liquid sampling autoclave. The inspectors verified that the operator performed the operations in accordance with the approved procedure and had an adequate understanding of the required safety controls.

Through interviews, document reviews, and observations, the inspectors verified that the licensee conducted periodic surveillances as required by the ISA Summary for the selected safety controls. The inspectors also evaluated the surveillances, which identified IROFS that failed to pass, were properly documented with appropriate corrective actions to return the control back to working order.

The inspectors observed shift turnover and control room communications to verify that the licensee implemented adequate conduct of operations practices to ensure the plant was operated in a safe and controlled manner. The inspectors attended the plan of the day meeting to verify that the licensee communicated plant operational issues and performance to licensee staff.

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

The inspectors reviewed operator training records to ensure that operators were qualified to perform their assigned duties, including the implementation of IROFS. The inspectors reviewed training records of licensee staff to verify they had completed their required IROFS training and annual criticality training as required by Section 2.3.3 of the Safety Analysis Report (SAR). One instance of failure to meet Nuclear Regulatory Commission (NRC) requirements was identified.

Introduction

An NRC-identified, non-cited, Severity Level (SL) IV violation of the Louisiana Energy Service, LLC (LES) License, specifically License Condition 30 (LC-30), was identified for failure to get NRC pre-approval of a change that resulted in a decrease in effectiveness of safety commitments as described in the SAR.

Description

During an NRC inspection the week of February 29, 2016, the inspectors identified that continuing training in criticality safety was not completed on an annual basis for three individuals as required by Section 2.3.3 of the SAR. The last dates of completion were January 2014, November 2014, and December 2014. The licensee informed the inspectors that TQ-3-0100-13, Training and Qualification Guidelines, was recently revised in November 2015 to permit a grace period of 25 percent, not to exceed six months for completion of recurring training and that all of the individuals identified except for one were within the specified grace period. The inspectors reviewed the requirements contained in Section 2.3.3 of the SAR, which provide the requirements for

training and qualification, to determine if a grace period was permitted by the license. Section 2.3.3, Training and Qualification, states, in part, that continuing training of personnel previously trained shall be performed for radiological and criticality safety at least annually, and shall include updating and changes in required skills. Based on this wording, the inspectors concluded that the SAR did not permit a grace period because it was silent on the issue and specified a frequency of "at least annually." Therefore, the inspectors concluded that the change should have been evaluated in accordance with the process outlined in LC-30 to determine if the change resulted in a decrease in effectiveness of safety commitments as described in the SAR. The inspectors requested the licensee to provide the completed LC-30 evaluation, but were notified that an evaluation had not been performed. The inspectors determined that there were at least two procedural barriers in-place to ensure that changes that potentially impact the SAR receive proper review by the site's licensing group. The first barrier was a requirement in AD-3-1000-01, Requirements for Program Documents," which requires that potential changes to license basis documents be routed to licensing and the responsible organization for the program or discipline impacted by the proposed change. The second barrier was the Title 10 of the *Code of Federal Regulations* (10 CFR) Section 70.72 evaluation. Specifically, block I.H of the Applicability Determination Checklist requires the evaluator to determine whether the proposed activity involved a change to the SAR. In both instances, the licensee failed to identify that the change potentially impacted the SAR and that a review by the site's licensing group was required. Subsequently, the licensee completed the LC-30 evaluation and concluded that NRC pre-approval of the change was required. Specifically, the evaluation concluded that the change added a 25 percent, not to exceed six months grace period to recurring training requirements, which was contrary to Section 2.3.3 of the SAR, which states "at least." The licensee concluded that the change resulted in a decrease in effectiveness of safety commitments as described in the SAR. The licensee entered this condition into their NRC-approved CAP as EV112341.

Analysis

The failure to meet LC-30, which requires the licensees to obtain NRC pre-approval of changes that result in a decrease in effectiveness of safety commitments as described in the SAR, was determined to be a violation of NRC requirements. Based on the NRC's review, the inspectors determined that the actual safety significance was very low because the failure to ensure that requirements were met resulted in no or relatively inappreciable potential safety or security consequences. However, the violation was found to be more than minor based on the following screening question in Inspection Manual Chapter (IMC) 0616, "Fuel Cycle Safety and Safeguards Inspection Reports." Screening question 14 states, "Does the noncompliance involve a failure to properly perform a 10 CFR 70.72 evaluation where the licensee failed to obtain a license amendment for the change? The answer to this question is yes because a LC-30 evaluation is similar to a 10 CFR 70.72 evaluation and the licensee concluded that a license amendment was required to make the change in a subsequent evaluation. The inspectors also determined that Example 4.e was applicable because it involved the failure to perform a 10 CFR 70.72 evaluation for an affected procedure. The example states that the violation is more than minor if the licensee subsequently completed the 10 CFR 70.72 evaluation and concluded that NRC pre-approval of the change was required. The issue is also similar to Example 4 of Section 6.2.d of the NRC

Enforcement Policy. This example states that under 10 CFR 70.72, a SL IV violation involves a less significant failure to adequately evaluate a change to the facility that results in implementation of the change without a required license amendment and the failure does not result in a SL I, II, or III violation.

Enforcement

License Condition 30 of Special Nuclear Material (SSNM) License No. 2010 requires, in part, that the licensee shall not make changes to the SAR, without NRC approval unless the criteria in paragraph b are satisfied.

Paragraph b of LC-30 states, in part, upon documented completion of a change request for a facility or process, the licensee may make changes in the facility or process as presented in the SAR, or conduct tests or activities not presented in the SAR that would normally be described therein, without prior NRC approval, subject to the following conditions:

Condition 3 of Paragraph b of LC-30, states, the change does not result in a decrease in effectiveness of safety commitments as described in the SAR.

Changes to the SAR shall be evaluated, documented and reported in accordance with the commitments in Enclosure 1 of correspondence dated May 24, 2012, LES-12-00074-NRC. Records of such changes shall be maintained, including technical justification and management approval, in dedicated records to enable NRC inspection upon request at the facility.

Contrary to the above, before March 3, 2016, the licensee failed to evaluate, document, and report a change to the SAR in accordance with the commitments of Enclosure 1 of correspondence dated May 24, 2012, LES-12-00074-NRC. Specifically, the licensee failed to evaluate, document, and report a change that permitted a grace period of 25 percent, not to exceed six months for completion of recurring training. The failure to evaluate the change in accordance with LC-30 resulted in a decrease in effectiveness of safety commitments as described in the SAR because the permitted grace period was contrary to the requirement in the SAR of “at least annually.”

The inspectors determined that the actual safety significance was very low because the failure to ensure that requirements were met resulted in no or relatively inappreciable potential safety or security consequences. However, the violation was found to be more than minor based on Screening Question 14 and Example 4.e of IMC 0616, Appendix B. The violation was determined to meet the criteria for a SL IV violation based on Example 6.2.d.4 of the NRC Enforcement Policy.

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 SL IV violations. The failure to evaluate a SAR change in accordance with LC-30 is a SL IV violation of NRC requirements. In accordance with Section 2.3.2.a of the Enforcement Policy, this violation is dispositioned

as a NCV due to being entered in the NRC-approved CAP as EV112341. This violation will be opened and closed as NCV 70-3103/2016-002-01, Failure to Evaluate a SAR Change in accordance with License Condition 30.

b. Conclusion

One NCV of NRC requirements was identified for failure to evaluate a SAR change in accordance with LC-30. This NCV is being tracked as NCV 70-3103/2016-002-01, Failure to Evaluate a SAR Change in accordance with License Condition 30.

2. Nuclear Criticality Safety (IP 88015)

a. Inspection Scope and Observations

The inspectors 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 safety 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, a member of the ISA/NCS plant engineering group, and operators about the NCS program. The inspectors reviewed aspects of selected NCS-related IROFS, including IROFS 15, 31 a/b/c, and C22.

The inspectors observed a weekly nuclear criticality safety inspection (NCSI) of Solid Waste Collection Room of the Cylinder Receipt and Dispatch Building, and reviewed aspects of the procedures, commitments, and records for weekly NCSIs to verify that the licensee is meeting its commitments as identified in the SAR. The inspectors performed a plant walk-down of the SCDT, multi-function decontamination train, liquid effluent collection and transfer system (LECTS), and SBM-1001. The inspectors observed the implementation of IROFS C22 and interviewed operations staff to confirm that NCS-related controls were being implemented in a way that performs the safety function specified in the associated NCS analysis and was adequate to ensure safety. In addition, the inspectors reviewed the criticality safety training requirements for operators and maintenance staff.

The inspectors also reviewed records of criticality accident alarm system (CAAS) tests in order to confirm that the licensee was adequately maintaining the CAAS reliability. The inspectors reviewed the licensee response to a selection of recent internally-reported events including CAAS related entries. The inspectors interviewed licensee staff and observed that the events were investigated in accordance with procedures and appropriate corrective actions were assigned and tracked. The inspectors reviewed emergency response procedures that address response to CAAS alarms and re-entry and recovery requirements.

b. Conclusion

No findings of significance were identified.

B. Facility Support

1. Maintenance and Surveillance of Safety Controls (IP 88025)

a. Inspection Scope and Observations

The inspectors interviewed managers and supervisors to evaluate maintenance and surveillance program activities. Through these interviews, work package reviews, and field observations, the inspectors verified that the maintenance and surveillance program was being implemented adequately.

The inspectors verified that the licensee's work/configuration control program had provisions to ensure the adequate pre-job planning and preparation of work packages to support maintenance and surveillance activities. The inspectors reviewed maintenance and surveillance work packages for accuracy and to ensure that test packages challenged and verified operability of various IROFS and safety controls such as autoclave manifold supports, pressure transducers, resistance temperature detectors (RTD), and thermocouples (TC). The inspectors verified that post-maintenance testing and calibrations, as specified by the procedure, were adequately performed prior to restoring IROFS and other safety equipment to operational status.

The inspectors toured the measuring and testing equipment (M&TE) laboratory and found testing and calibration equipment to be within calibration, properly labeled, and properly stowed. The inspectors also noted that the licensee maintained an electronic spreadsheet which provided notification of upcoming required equipment maintenance and calibrations. The inspectors reviewed certificates of calibration of M&TE and found them to be up-to-date. Inspectors also noted that M&TE suppliers, who also provide off-site calibration services, were on the licensee's approved suppliers (ASL) list.

The inspectors observed surveillance testing on IROFS 4 and IROFS 5 (an RTD and a TC, respectively, and the associated logic) and determined that the work activities were conducted in accordance with licensee requirements and the latest procedures. Communications between the two craftsmen was observed to be adequate. Prior to returning equipment to service, the licensee adequately reviewed completed work packages.

The inspectors observed multiple maintenance plan-of-the-day (POD) meetings and one plant-wide POD entry. Communications were noted to be adequate and the meetings were conducted in an organized manner. Inspectors noted that the licensee had safety-related, questioning attitudes in regards to upcoming assignments.

The inspectors reviewed the licensee's CAP to verify that performance issues relating to the maintenance and surveillance of IROFS and safety controls were entered into the CAP. Based on a review of event reports, appropriate corrective actions were taken in

response to failed or degraded safety control. Inspectors also reviewed quality assurance (QA) audits and self-assessments, and found the efforts to be in accordance with the licensee's required schedule. All findings were entered into the CAP.

b. Conclusion

No findings 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 March 3 and March 31 to S. Thyne 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

Name	Title
A. Blackshear	Plant Engineering/ISA NCS
M. Bodenreider	Operations Shift Manager
S. Cowne	Head of Compliance
J. Dahlin	Quality Assurance and Employee Concerns Program Manager
M. Graham	Plant Engineering/ISA NCS
J. Laughlin	Chief Nuclear Officer and Head of Operations
R. Medina	Licensing Engineer II
J. Muth	Recycling
Q. Newell	NCS Engineer
J. Rickman	Licensing Specialist
R. Shelton	Measuring and Test Equipment Manager
C. Slama	Licensing Project Manager
S. Thyne	Licensing Manager

2. LIST OF ITEMS OPENED, CLOSED, AND DISCUSSED

Opened

70-3103/2016-002-01	NCV	Failure to Evaluate a SAR Change in accordance with License Condition 30 (Paragraph A.1.a)

Closed

70-3103/2016-002-01	NCV	Failure to Evaluate a SAR Change in accordance with License Condition 30 (Paragraph A.1.a)

3. INSPECTION PROCEDURE USED

88015	Nuclear Criticality Safety
88020	Operational Safety
88025	Maintenance and Surveillance of Safety Controls

4. DOCUMENTS REVIEWED

Records:
Operability Evaluation for EV-11069, dated December 17, 2015
RW-3-4000-02-F-2, IROFS 15 Verification Data Sheet, dated February 2, 2016
TQ-3-0100-09-F-5, Certification/Evaluation Forms, dated August 5, 2013

Certificates of Calibration:
10409227, Tektronix, dated September 10, 2015
10677671, Tektronix, dated November 25, 2015
10849814, Tektronix (Ametek/Danak/ILAC), dated January 21, 2016

Work Orders:
1000192091, SBM1: 471-3SDL5 Bolt Seized (P), dated May 4, 2015
1000192405, CRDB: IROFS 43 TTR Need Replaced, dated May 6, 2015
1000192477, SBM3: Assemble Autoclave Sample Manifold, dated May 8, 2015
1000192478, SBM3: Assemble Autoclave Sample Manifold, dated May 8, 2015
1000192479, SBM3: Assemble Autoclave Sample Manifold, dated May 8, 2015
1000193315, SBM3: Replace TTR On 434-3B3 (C) (P)
1000195880, SBM3: 414-1B1 IROFS5 Button Wires (P), dated June 3, 2015
1000196554, SBM1: Autoclave Manifold Fitting Leak, dated June 6, 2015
1000196744, SBM1: 472-3MP1 Erratic Readings (Emerg), dated June 10, 2015
1000198252, SBM1: 471-3SDL1 IROFS28 Bolt (P), dated June 24, 2015
1000206703, IROFS43 Surveillance, dated November 1, 2015
1000206847, IROFS43 Surveillance, dated November 1, 2015
1000214716, CRDB: Perform IROFS43 Testing, dated October 21, 2015
1000229121, IROFS 4 & 5, dated March 1, 2016
1000208106, UBC: Crane Mechanical Issue, dated August 28, 2015
1000211215, CRDB: 493-6MT3 IROFS43 Trip, dated September 25, 2015
1000213337, SITE: 499-3U1 Install C21 Orifice, dated October 14, 2015
1000213413, CRDB: IROFS 43 Surveillance On Rig#1, dated October 15, 2015
1000213414, CRDB: IROFS 43 Surveillance On Rig#2, dated October 15, 2015
1000213574, UBC: Crane Bearing Out, dated October 16, 2015
1000214183, SBM1: 471-3SDL4 Bolt Damaged, dated October 20, 2015
1000214852, UBC: Crane Bearings, dated October 22, 2015
1000222349, CRDB: Autoclave Saddle Missing Washer, dated October 31, 2015
1000224088, UBC: Replace Bearing UBC Crane, dated November 30, 2015
1000225209, SBM1, 471-3SDL3 Seized Bolt, dated November 18, 2015
1000226639, UBC: ACECO Install Wheel Assem. 20T, dated December 2, 2015
1000229360, SBM1: 471-3SDL1 Seized Bolt, dated December 17, 2015
1000229362, SBM1: RTD Broken Wire, dated December 17, 2015
1000231632, CRDB: Seized IROFS28 Bolt, dated January 7, 2016
1000232327, UBC: Crane ACECO Work, dated January 11, 2016
1000181929, TSB: CIDAS Slave Fault, dated March 4, 2015
1000182000, Site CAAS Annual Maintenance, dated May 20, 2015
1000190333, TSB: CIDAS Evacuation System Fault, dated April 19, 2015
1000199334, TSB: CAAS BES Fault, dated July 3, 2015
1000204047, SBM1: Blue Loop CAAS DET Failed, dated August 10, 2015
1000205068, T/S 1001/CRDB CAAS Loop Reset Failure, dated August 21, 2015
1000207476, 1Y: Tuning of CAAS Amplifier Output Monitoring, dated November 15, 2015
1000207638, SITE: Correct CAAS Deficiencies, dated October 25, 2015
1000225658, CRDB: 561 KOWL Signage Damage, dated January 21, 2016

Condition Reports Reviewed:
EV105149
EV108598
EV109992
EV110620
EV105199
EV109969
EV110068
EV110069

Condition Reports Written as a Result of the Inspection:
EV102460, IROFS 24B, Tracking in NEF-BD-24b
EV110951, Inconsistency in IROFSC22 independent verification requirements
EV110975, Recommendation during NRC observation
EV110977, Documented comments Identified by NRC during IP 88015 inspection
EV110978, Tracking number not visible on some visitor electronic alarming dosimeters
EV110979, Maintenance IROFS procedures need revision
EV110985, Tektronix-Irving sub-supplier Crystal Engineering, an Ametek Inc. Co. not on ASL
EV110992, Annual criticality safety training discrepancies
EV110993, IROFS training not conducted biennially

NCS Inspections:
NCSI-15-0037, LECTS, dated September 11, 2015
NCSI-15-0042, SBM-1005 UF6 Handling Area, dated October 16, 2015
NCSI-15-0050, UF6 Handling Area/PSC SBM 1005, dated December 9, 2015
NCSI-15-0051, GEVS Room – CRDB, dated December 17, 2015
NCSI-15-0052, UF6 Area of SBM 1001, dated December 30, 2015
NCSI-16-0001, UF6 Handling Area/PSC SBM 1001, dated January 8, 2016
NCSI-16-0002, UBC Storage Pad, dated January 14, 2016
NCSI-16-0003, CRDB 30B Storage Areas, dated January 22, 2016
NCSI-16-0004, SBM-1003 UF6 Handling Area/PSC, dated January 29, 2016
NCSI-16-0005, SBM-1005 UF6 Handling Area, dated February 5, 2016
NCSI-16-0006, SBM1003 PVPTS, dated February 12, 2016
NCSI-16-0007, 1005/1006 PSC, dated February 17, 2016

Procedures:
AD-3-1000-01, Requirements for Program Documents, Revision (Rev.) 21
CA-3-1000-09, Assessment Program, Rev. 10, dated August 10, 2015
CC-OP-2015-0002, Rev. of IROFS31a/b/c, dated November, 24, 2015
CR-3-1000-03, NCS Weekly Walkthroughs and Periodic Assessments, Rev. 11, dated November 11, 2013
EP-3-0200-10, Criticality Emergency Response, Rev. 3, dated September 24, 2015
FP-3-1000-01, Fire System and Features Testing and Inspection, Rev. 5, dated December 2, 2013
FP-3-1000-05, Pre-Incident Plan Development and Control, Rev. 5, dated December 2, 2013
FP-3-1000-05-F-1, Pre-Incident Plan Approval Form, Rev. 5, dated February 12, 2015
FP-3-2000-04, IROFS35 Weekly Fire Door Inspection and IROFS 36a Combustibles Control Inspection – SBM, Rev. 13
MA-2-1000-01, Conduct of Maintenance, Rev. 2, dated December 14, 2015
MA-2-1000-02, Preventative Maintenance Program, Rev. 0, dated March 21, 2008
MA-2-1000-03 Surveillance Program, Rev. 4, dated June 22, 2011
MA-2-1000-06, M&TE Calibration Program, Rev. 2, dated July 16, 2014
MA-3-0400-05, Calibration and Adjustment of IROFS16 Series Pressure Transducers, dated August 5, 2015
MA-3-1000-02, Calibration and Control of Measuring &Test Equipment, Rev. 8, dated October 2, 2014
MA-3-3400-04, IROFS4 Station Heaters High Temperature Trip – RTD Surveillance, Rev. 5, dated June 18, 2014

MA-3-3400-05, IROFS5 Station Heaters High Temperature Trip – TC Surveillance, Rev. 3, dated June 18, 2014
NEF-BDD-10, Design Features to Maintain Product Liquid Sampling Autoclave Leak Tight Integrity, Rev. 5
NEF-BDD-C22, Verify Subcriticality by Mass Balance Calculation, Rev. 7
NEF-BDD-035, Fire Rated Barriers, Rev. 16
NEF-BDD-54a, Administratively Limit the Calculated SCDT Uranic Mass Inventory, Rev. 0
NEF-BDD-54b, Administratively Limit the Calculated SCDT Uranic Mass Inventory, Rev. 0
OP-3-1000-01, Conduct of Operations, Rev. 23
OP-3-3300-01, Operations Surveillance Procedure, Rev. 29
OP-3-0560-01, Criticality Accident Alarm System, Rev. 2, dated February 16, 2012
OP-3-0560-02, Criticality Accident Alarm System Alarm Response, Rev. 2, dated February 25, 2013
ORM 3600-26, Maintaining Subcritical Configuration by Limiting Enriched Uranic Material Transfer, Rev. 0
ORM 3600-32, Verify Subcriticality by Mass Balance Calculation (IROFSC22), Rev. 5
RW-3-4000-01, Startup, Shutdown, and Operation of the SCDT, Rev. 3
RW-3-4000-02, Startup, Operation and Shutdown of the Multi-Functional Decontamination Train, Rev. 5, dated September 28, 2015
TQ-3-0100-13, Training and Qualification Guidelines, Rev. 5
WC-2-1000-01, Work Control Program, Rev. 8, dated June 26, 2013
WC-3-1000-02, Work Package - Initiation through Closure (SAP Order Types PM1/PM3), Rev. 21, dated September 22, 2014
WC-4-1000-02, Conduct of Pre-Job and Post-Job Briefs, Rev. 6

Other Documents:
2016-A-02-005, Report for the URENCO USA Maintenance/QL-1 Audit, dated March 2, 2016
2016 Maintenance Schedule
CA-3-1000-09-F-1, Focused Self-Assessment Maintenance and Surveillance Safety Controls, Assessment Number 2015-016, dated November 16-18, 2015
Maintenance Organization Chart, dated January 27, 2016
NEF-BD-004, Auto Trip of Station Heater on High Temperature (RTD), Rev. 1, dated January 28, 2010
NEF-BD-005, Auto Trip of Station Heater on High Temperature (TC), Rev. 1, dated January 28, 2010
QA Audit, 2014-A-04-011, dated May 28, 2014
QA Suppliers/Vendors List
Operations Shift Log Entries
Training records for two craftsmen