

10 CFR 71.95 REPORT EVALUATION FORM

Docket No.: 71-9196
Package Model No.: UX-30
Report Submitted By: Jay Laughlin, Louisiana Energy Services, LLC
Report Date: July 20, 2012
Report ADAMS Accession No.: ML12207A129

Review the incoming report to determine if additional Commission or staff action is warranted. The review should consider whether the report identifies a generic defect or problem with the package design and the safety significance of the issue. Note that a high safety significance represents a potential for significant radiation exposure, medium safety significance represents a potential for some moderate radiation exposure, and low safety significance represents little or no potential for radiation exposure.

1. The report identifies:

- Significant reduction in the effectiveness of a package during use;
- Defect with a safety significance;
- Shipment in which conditions of the approval were not observed.

2. What is the safety significance? High Medium Low

3. Summary of the report:

On June 14, 2012, at approximately 10:32 AM Mountain Daylight Time, the Westinghouse Electric Company Lead Transport Specialist notified Louisiana Energy Services, LLC that the first shipment of six 30B product cylinders arrived at Hopkins, SC without bolt plugs installed in the UX-30 protective shipping packages (overpacks) lid lifting lugs. These bolts disable the use of the lid lifting lugs during loading and unloading operations. The UX-30 protective shipping package certificate of compliance requires users to comply with the Chapter 7 instruction in the UX-30 Safety Analysis Report. Specifically, SAR Section 7.1.2.17 states, "Install the bolt plugs in the optional lid lifting lugs as shown in the General Arrangement Drawings, Appendix 1.4.1." Step 8.2.17 of Louisiana Energy Services, LLC procedure LO-3-2000-04, "Container Handling During Initial Plant Start-Up," also contains this requirement. This step in the procedure was not followed prior to shipment of the product cylinders.

Human error caused this event. Specifically, operators failed to follow written procedures. Step 8.2.17 in LO-3-2000-4, "Container Handling during Initial Plant Start-Up," clearly directs personnel handling containers to install bolt plugs in lid lifting lugs. In addition, Step 8.2.34 requires personnel to inspect outbound vehicles using LO-3-2000-04-F-1, "Vehicle/Shipment Inspection Checklist." After being notified of this incident, Louisiana Energy Services, LLC reviewed this checklist and found it did not include the verification of proper placement of bolt plugs.

An assessment of the safety consequences and implications of the event were discussed with the certificate of compliance holder, and this condition was determined to have low safety significance. The plugs represent a defense in depth by preventing use of the lifting lugs when the UX-30 containing a cylinder is loaded or unloaded. No exposure of individuals to radiation or to radioactive materials resulted from this event. There were no component failures associated with this incident. Each cylinder contained approximately 2235 Kg of solid UF₆ per cylinder.

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4. Corrective actions taken by the licensee:

On June 19, 2012, the licensee briefed container handling personnel on the importance of procedural compliance. The licensee implemented a work flow check for the next shipment which included the following activities in addition to routine steps: 1) an additional working copy of the procedure was provided to container handlers conducting activities removed from the primary work such that each step could be verified as the work evolution progressed; 2) each step of the procedure was initiated when completed; 3) a peer check of shipment configuration was performed after completion of the cylinder loading; and 4) a supervisor observed work evolutions. Procedure LO-3-2000-4, "Container Handling During Initial Plant Start-Up," was also revised to include verification of bolt plug installation as part of the inspection checklist. The licensee issued the revised procedure on June 21, 2012.

5. Staff comments:

This event has low safety significance since the certificate of compliance requirement with which the licensee did not comply was identified as a defense in depth measure. In addition, the licensee identified and implemented corrective actions to prevent recurrence of this incident.

6. Staff conclusion:

The report does NOT identify generic design or license/certificate issues that warrant additional Commission or staff action. This report is considered closed.

There is a need to take additional action. Provide a summary of the bases and recommended actions:

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