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

July 27, 2017

Mr. David Del Vecchio
President and Chief Operating Officer
CB&I AREVA MOX Services
Savannah River Site
P.O. Box 7097
Aiken, SC 29804-7097

SUBJECT: MIXED OXIDE FUEL FABRICATION FACILITY- NRC INSPECTION REPORT NUMBER 70-3098/2017-002

Dear Mr. Del Vecchio:

During the period from April 1, 2017, through June 30, 2017, the U. S. Nuclear Regulatory Commission (NRC) completed inspections pertaining to the construction of the Mixed Oxide Fuel Fabrication Facility. The purpose of the inspections was to determine whether activities authorized by the construction authorization and license application were conducted safely and in accordance with NRC requirements. The enclosed inspection report documents the inspection results. At the conclusion of the inspections, the findings were discussed with those members of your staff identified in the enclosed report.

The inspections examined activities conducted under your construction authorization and license application as they relate to safety and compliance with the Commission's rules and regulations and with the conditions of your authorization. The inspectors reviewed selected procedures and records, observed construction activities, and interviewed personnel.

Based on the results of this inspection, no violations or deviations were identified. In accordance with 10 CFR 2.390 of NRC's "Rules of Practice and Procedure," a copy of this letter and its enclosure may be accessed through the NRC's public electronic reading room, Agency-Wide Document Access and Management System (ADAMS) on the internet at http://www.nrc.gov/reading-rm/adams.html.

Should you have any questions concerning this letter, please contact us.

Sincerely,

/RA/

Michael Ernstes, Chief
Construction Inspection Branch 3
Division of Construction Oversight

Docket No. 70-3098
Construction Authorization No.: CAMOX-001

Enclosure: NRC Inspection Report No. 70-3098/2017-002
w/attachment: Supplemental Information

cc w/encl: (See next page)

cc w/encl:
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Letter to D. Del Vecchio from Michael Ernstes dated July 27, 2017.

SUBJECT: MIXED OXIDE FUEL FABRICATION FACILITY- NRC INSPECTION REPORT NO. 70-3098/2017-002

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NAME	W. Gloersen	J. Hamman	D. Harmon	B. Griman	D. Piccirillo	D. Terry-Ward	M. Ernstes
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U.S. NUCLEAR REGULATORY COMMISSION

REGION II

Docket No.:	70-3098
Construction Authorization No.:	CAMOX-001
Report No.:	70-3098/2017-002
Applicant:	CB&I AREVA MOX Services
Location:	Savannah River Site Aiken, South Carolina
Inspection Dates:	April 1 – June 30, 2017
Inspectors:	J. Hamman, Acting Senior Resident Inspector, Construction Inspection Branch 3 (CIB3), Division of Construction Oversight (DCO) B. Griman, Construction Inspector, Construction Inspection Branch 2 (CIB2), DCO D. Harmon, Construction Inspector, CIB2, DCO G. Khouri, Senior Construction Inspector, Construction Inspection Branch 1 (CIB1), DCO D. Piccirillo, Senior Construction Inspector, CIB2, DCO D. Terry-Ward, Construction Inspector, Construction Inspection Branch 4 (CIB4), DCO
Accompanying Personnel:	M. Ernstes, Branch Chief, CIB3, DCO W. Gloersen, Senior Construction Project Inspector, CIB3, DCO
Approved by:	Michael Ernstes, Chief Construction Inspection Branch 3 Division of Construction Oversight

Enclosure

EXECUTIVE SUMMARY

CB&I AREVA MOX Services (MOX Services)
Mixed Oxide (MOX) Fuel Fabrication Facility (MFFF)
NRC Inspection Report (IR) Number (No.) 70-3098/2017-002

The scope of the inspections encompassed a review of various MFFF activities related to Quality Level (QL)-1 (safety-related) construction for conformance to U.S. Nuclear Regulatory Commission (NRC) regulations, the Construction Authorization Request (CAR), the MOX Project Quality Assurance Plan (MPQAP), applicable sections of the license application (LA) and applicable industry codes and standards. This inspection included, as applicable, the following inspection attributes: As-built/functional arrangements of structures, systems, and components; procedures; and installation.

The following principle systems, structures and components (PSSCs) are discussed in this inspection report:

- PSSC-004, C2 Confinement System Passive Barrier
- PSSC-006, C4 Confinement System
- PSSC-009, Criticality Control
- PSSC-024, Gloveboxes
- PSSC-041, Process Cells

Routine Resident Inspections

The inspectors routinely reviewed the applicant's weekly construction status package, reviewed the status of work packages maintained at various work sites, conducted daily tours of work and material storage areas, observed installation of mechanical equipment, and reviewed various corrective action documents to assess the adequacy of the MOX Services' corrective action program. Construction activities were performed in a safe and quality-related manner. (Section 2)

PSSC Inspections

PSSC-004, C2 Confinement System Passive Barrier

Welding was being performed on C2 Confinement System components with materials, variables, and techniques that were specified by the welding procedure and code. In addition, work processes were being adequately controlled. (Section 3.a)

PSSC-006, C4 Confinement System

For the samples reviewed, MOX Services performed receipt activities related to QL-1 ventilation components in accordance with their specifications, procedures and the MPQAP. The applicant maintained the physical condition of the QL-1 ventilation components sampled through the use of proper handling, storage and control techniques of ventilation components. In addition, the applicant maintained the associated records and documentation for these QL-1 ventilation components. (Section 3.b)

PSSC-009, Criticality Control

The inspectors reviewed construction activities related to PSSC-009, Criticality Control, as described in Table 5.61 of the MFFF CAR for gloveboxes which were identified as items relied on for safety (IROFS). This inspection was for the verification of subcritical dimensions. The inspectors reviewed field measurements of subcritical dimensions, independently verified a sample of subcritical dimensions, and reviewed work packages that documented verifications of subcritical dimensions. The inspectors also verified calibration of measuring equipment for observed field measurements performed by the applicant. (Section 3.c)

PSSC-024, Glovebox

The inspectors reviewed construction activities related to PSSC-024, Glovebox as described in Table 5.6-1 of the MFFF CAR. As these inspections were related to the cleanliness and layup of installed gloveboxes in the MFFF. The inspection attribute observed was procedures, specifically if gloveboxes installed in the MFFF were maintained in accordance with project procedures and specifications. (Section 3.d)

PSSC-041, Process Cells

The inspectors reviewed construction activities related to PSSC-041, Process Cells, as described in Table 5.6-1 of the MFFF CAR. The inspection attributes observed was installation. The associated IROFS component was piping Module in Room C-234. The inspectors observed module placement and performed an inspection of the module and surrounding piping after the module was set. (Section 3.e)

REPORT DETAILS

1. Summary of Facility Status

During the inspection period, the applicant (CB&I AREVA MOX Services (MOX Services)) continued construction activities of principal systems, structures and components (PSSCs). Other construction activities included staging of process piping and installation of supports in the Aqueous Polishing Building (BAP); installation of process piping in the BAP; installation of ventilation system ductwork and supports in the BAP and MOX Processing Building (BMP); installation of drip trays in the BAP; installation of fire dampers in the BAP and BMP; and installation of various gloveboxes in the BAP and BMP. The applicant continued to receive, store, assemble, and test glove boxes and process equipment at the Process Assembly Facility (PAF).

2. Routine Resident Inspection Activities

a. Inspection Procedure (IP) 88130, Construction: Resident Inspection Program for On-Site Construction Activities at the Mixed Oxide Fuel Fabrication Facility

(1) Scope and Observations

The inspectors routinely reviewed the applicant's construction weekly status meeting summaries. The inspectors held discussions with MOX Services design engineers, field engineers, quality assurance (QA) and quality control (QC) personnel, and subcontractor construction personnel in order to maintain current knowledge of construction activities and any problems or concerns.

The inspectors attended the weekly management review committee (MRC) meeting to observe the dispositions of current conditions adverse to quality (CAQ) being captured in the applicant's corrective action program. The inspectors reviewed various corrective action documents. The review included non-conformance reports (NCRs) and condition reports (CRs). The inspectors also reviewed the closure of 10888-MOX-CR-16-442.

The inspectors also interviewed the software design staff to determine if MOX procedures and engineering guidelines were being revised and or developed per an internal published schedule which was submitted for review.

The inspectors reviewed the status of work packages (WPs) maintained at various work sites. The inspectors routinely performed tours of the MOX Fuel Fabrication Facility (MFFF) work areas to observe ongoing work activities and communications, and to evaluate adequate worker attentiveness and procedural compliance.

The inspectors reviewed procedure PP10-37, Rev. 3, Control of Issued Material, to determine if the applicant's procedure for storing items relied on for safety (IROFS) components met the requirements of NQA-1 1994. The inspectors performed a walk down of a sample of storage areas in the MFFF to determine if items were being stored in accordance with the requirements specified by project procedure (PP) 10-37. Specifically, the inspectors performed this review to determine if items were being stored off the ground and were kept from accumulating water, if storage areas were appropriately marked and controlled, and whether the areas were clean and orderly.

The inspectors also reviewed a sample of past storage inspection records to determine if storage areas were being regularly inspected as required.

The inspectors reviewed procedure PP1-58, Revision 4, Weld Filler Material Control, to determine if it adequately specified requirements for the proper storage and issuance of welding material such that welding materials would be stored and issued in a controlled manner and that the materials themselves would not be degraded by the environment. In addition, the inspectors performed a walk down of the weld filler material storage room inside the secure warehouse to determine if the procedure was being adequately implemented. The inspectors verified the following:

- coated electrodes were stored in either sealed containers or ovens;
- the weld filler material storage room was kept secure and only authorized personnel were allowed entry;
- welding rods were marked, segregated, and stored properly; and
- all other requirements from the procedure were being met.

(2) Conclusions

No findings were identified.

3. PSSC Inspections

a. PSSC-004, C2 Confinement System Passive Barrier (IP 55050, Nuclear Welding General Inspection Procedure)

(1) Scope and Observations

The inspectors observed construction activities related to PSSC-004, C2 Confinement System Passive Barrier, as described in Table 5.6-1 of the MFFF CAR. The inspection attributes observed were installation and special processes (welding). Specifically, the inspectors observed welding of joint 15-B204-MDE-2569-FW001-C0R0 of the medium depressurization exhaust (MDE) heating, ventilation, and air conditioning (HVAC) system to determine if welding was being performed with materials, variables, and techniques that were specified by the welding procedure and code. The inspectors also reviewed the weld data sheet and weld material requisition form to determine if the work processes were being adequately controlled.

(2) Conclusions

No findings were identified.

b. PSSC-006, C4 Confinement System (IP 88139, Ventilation and Confinement Systems)

(1) Scope and Observations

The inspectors observed construction activities related to PSSC-006, C4 Confinement System, as described in Table 5.6-1 of the MFFF CAR. The inspection attribute observed was control of equipment, materials, and services. Specifically, the inspectors reviewed receipt inspection reports (RIR) associated with QL-1 ventilation piping for the

MFFF to verify that the documents were in accordance with regulatory and QA programmatic requirements and industry standards.

The inspectors reviewed nine RIR packages associated with QL-1 ventilation piping. For these QL-1 ventilation components, the inspectors evaluated the adequacy of the documentation packages with respect to procurement specifications and other engineering-related documents. The inspection of these documentation packages focused on ensuring that they specified the shape, size, dimension, and material type and grade. The inspectors also verified that the Certificate of Conformance (CoC) certified the components met construction, material, test, and qualification requirements associated with these QL-1 ventilation components.

For the samples reviewed, MOX Services performed receipt activities related to QL-1 ventilation components in accordance with their specifications, procedures and the MPQAP. The applicant maintained the physical condition of the QL-1 sampled ventilation components through the use of proper handling, storage and control techniques. In addition, the applicant maintained the associated records and documentation for these QL-1 ventilation components.

(2) Conclusions

No findings were identified.

c. PSSC-009, Criticality Control (IP 88136, Construction: Mechanical Components)

(1) Subcritical Dimension Verification

(a) Scope and Observations

The inspectors reviewed construction activities related to PSSC-009, Criticality Control, as described in Table 5.6-1 of the MFFF CAR for IROFS electrolyzer glovebox KDB*GB1000, KDD*GB2000 and KDD*GB2000, decanning glovebox KDA*GB9000, KDM*6400 and KDM*GB7400, and sintering furnace glovebox PFF*GB9000. The inspection attribute reviewed was as-built functional arrangement. The inspectors observed the measuring of electrolyzer glovebox subcritical dimensions. The inspectors observed measurement preparation by the applicant survey team, verified calibration of survey equipment, and verified dimensions were recorded in accordance with procedure PP9-39. The inspectors also verified that out of tolerance dimensions were entered into the applicant's corrective action program and reviewed the technical evaluation for the acceptance of the dimensions. The inspectors independently measured a sample for seven dimensions from the decanning glovebox KDA*GB9000, KDM*6400 and KDM*GB7400. The inspectors also reviewed the technical justification for the acceptance of missed subcritical dimensions for the decanning gloveboxes. The inspectors reviewed work packet DCS01-PFF-AG-WPK-M-3578-T02 for the sintering furnace glovebox PFF*GB9000. The inspectors reviewed work steps for taking subcritical dimensions and verified actual measurements were in tolerance.

(b) Conclusion

No findings were identified.

d. PSSC-024, Glovebox (IP 88136, Construction: Mechanical Components)

(1) Scope and Observations

The inspectors reviewed construction activities related to PSSC-024, Glovebox, as described in Table 5.6-1 of the MFFF CAR. The inspection attribute observed was procedures. The inspectors verified that for the gloveboxes observed, the installments in the MFFF were maintained in accordance with project procedures and specifications. The inspectors performed a walkdown of gloveboxes in room B230 to ensure gloveboxes were placed in appropriate lay-up conditions in accordance with applicant procedures.

(2) Conclusion

No findings were identified.

e. PSSC-041, Process Cells (IP 88136, Construction: Mechanical Components; IP 55050, Nuclear Welding General Inspection Procedure)

(1) Scope and Observations

The inspectors reviewed construction activities related to PSSC-041, Process Cells, as described in Table 5.6-1 of the MFFF CAR. The inspection attributes observed were installation and special processes (welding). The associated IROFS component was piping Module 18 in Room C-234. The inspectors observed module placement and performed an inspection of the module and surrounding piping after the module was set. The inspectors observed two sections of pipe that appeared to have been damaged by module placement. The inspectors verified that the sections were addressed in the applicant's corrective action program.

The inspectors also observed installation and welding activities associated with IROFS KCD Drip 6900. Specifically, the inspectors observed welding of a drip tray in room C-110, weld number 15-C110-DRIP-1964-FW312-C0R0, to determine if welding was being performed with materials, variables, and techniques that were in accordance with the welding procedure and code. The inspectors also reviewed the weld data sheet and weld material requisition form to determine if the work processes were being adequately controlled. In addition, the inspectors performed a review of the documents associated with the welding operation. The inspectors reviewed the welding procedure to determine if it had been written and approved in accordance with American Welding Society (AWS) D1.6 1999 edition. The inspectors traced the welding filler material being used via a unique heat number to a certified material test report from the supplier which the inspectors reviewed to verify if the material had been procured and tested in accordance with the requirements of Specification of Filler Analysis (SFA)-5.9 of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code, Section II Part C for ER316/316L filler metal. Lastly, the inspectors reviewed the welder's qualification records to determine if the welder had been qualified to make the weld in accordance with AWS D1.6 Stainless Steel Welding Code 1999 edition.

(2) Conclusions

No findings were identified.

4. Exit Meeting

The inspection scope and results were summarized throughout this reporting period by inspectors representing the Division of Construction Oversight and at an exit meeting with applicant management on July 13, 2017. Although proprietary documents and processes may have been reviewed during this inspection, the proprietary nature of these documents or processes was not included in this report.

SUPPLEMENTAL INFORMATION

1. PARTIAL LIST OF PERSONS CONTACTED

D. Del Vecchio, President and Chief Operating Officer
M. Gober, Vice President, Engineering
D. Gwyn, Licensing/Nuclear Safety Manager
D. Ivey, Project Assurance Manager
J. Keklak, QA Manager
E. Radford, Regulatory Compliance
G. Rousseau, Executive Vice President, Deputy Project Manager
J. Starling, Nuclear Safety
B. Ward, Vice President, Construction and Project Management
D. Yates, Licensing

2. INSPECTION PROCEDURES (IPs) USED

IP 55050	Nuclear Welding General Inspection Procedure
IP 88130	Resident Inspection Program For On-Site Construction Activities at the Mixed-Oxide Fuel Fabrication Facility
IP 88139	Ventilation and Confinement Systems

3. LIST OF ITEMS OPENED, CLOSED, AND DISCUSSED

Item Number	Status	Description

None

4. LIST OF ACRONYMS USED

ADAMS	Agency-Wide Document Access and Management System
ASME	American Society of Mechanical Engineers
AWS	American Welding Society
BAP	Aqueous Polishing Building
BMP	MOX Processing Building
CAQ	Condition Adverse to Quality
CAR	Construction Authorization Request
CIB1, 2, 3	Construction Inspection Branch 1, 2, 3
CMTR	Certified Material Test Report
CoC	Certificate of Conformance
CR	Condition Report
DCO	Division of Construction Oversight
ECR	Engineering Change Request
GB	Glovebox
HVAC	Heating, Ventilation, and Air Conditioning
IP	Inspection Procedure
IR	Inspection Report
IROFS	Items Relied on for Safety

KCD	Oxalic Mother Liquors Recovery Unit
KDA	Decanning Unit
KDB	Dissolution Unit
KDD	Dechlorination and Dissolution Unit
KDM	Milling Unit
LA	License Application
MDE	Medium Depressurization Exhaust
MFFF	MOX Fuel Fabrication Facility
MOX	Mixed Oxide
MOX Services	CB&I AREVA MOX Services
MPQAP	MOX Project Quality Assurance Plan
MRC	Management Review Committee
NCR	Non-conformance Report
No.	Number
NRC	Nuclear Regulatory Commission
NTM	Jar Storage and Handling
PAF	Process Assembly Facility
PFF	Sintering Furnace Unit
PP	Project Procedure
PSSC(s)	Principle System(s), Structure(s), and Component(s)
QA	Quality Assurance
QC	Quality Control
QL-1	Quality Level 1
RII	Region II
Rev.	Revision
RIR	Receipt Inspection Report
SFA	Specification of Filler Analysis
WP	Work Package

5. LIST OF PSSCs REVIEWED

PSSC-004, C2 Confinement System Passive Barrier
PSSC-006, C4 Confinement System
PSSC-009, Criticality Control
PSSC-024, Gloveboxes
PSSC-041, Process Cells

6. RECORDS AND DOCUMENTS REVIEWED

Condition Reports

10888-MOX-CR-16-442, Damaged Pipe in C-234 Active Gallery
10888-MOX-CR-16-181, QC hold point violation
10888-MOX-CR-17-160, Housekeeping for NTM Gloveboxes
10888-MOX-CR-17-157, Damaged Pipe during Module 18 Fly In
10888-MOX-CR-17-174, (NRC Identified) PP-09-39A Requirements
10888-MOX-CR-17-202, Improperly Labeled Storage Areas in MFFF
10888-MOX-CR-17-204, Rod Room Storage
10888-MOX-CR-17-208, Purge Gas Flow Meter
10888-MOX-CR-17-209, Monthly Controlled Storage Area Inspections

Drawings

DCS01-KDA-MG-PLE-M-90100, Decanning Unit KDA*GB9000 Dosing Hopper Glovebox General Arrangement, Rev 2

Engineering Change Requests (ECRs)

ECR 022692, Update Cleanliness Requirements for Process Unit Installation Spec, Rev. 1
ECR 000756 AP Dosing Hopper KDA-KDM-Sub-criticality Geometry Requirements Drawing, Rev. 2

Nonconformance Reports (NCRs)

10888-MOX-NCR-12-3776, No evidence of subcriticality dual verification
10888-MOX-NCR-13-5032, Inaccessible subcritical dimensions
10888-MOX-NCR-17-4795, Receipt Inspection Report Missing
10888-MOX-NCR-17-7517, Subcritical Dimensions below required dimensions
10888-MOX-NCR-17-7550, Validation Height and Length of DMST8500
10888-MOX-NCR-17-7567, Damaged Pipe Spools in C-234
10888-MOX-NCR-17-7570, Loss of Pipe Spool Traceability
10888-MOX-NCR-17-7574, Damaged Pipe in C-234
10888-MOX-NCR-17-7578, Damaged Pipe in C-234 Module 18
10888-MOX-NCR-17-7606, Cracks Identified in Drip Tray Material

Miscellaneous

DCS01-KDA-DS-ANS-H-35015 5, Nuclear Criticality Safety Evaluation of the KDA, KDM, and KDR Units
DCS01-KDA-CG-CAL-H-06057 1 (Rev. 1), Criticality Safety of the Dosing Hopper Assemblies of KDA and KDM Units, Quality Level 1 IROFS
DCS01-AAJ-DS-NTF-D-40027-2, MOX Fuel Fabrication Facility Design Description
Record of welder qualification for AWS D1.6 for welder B020
Weld Material Requisition Form for weld ID 15-C110-DRIP-V-0001-1964
Weld Data Sheet for weld 15-C110-DRIP-1964-FW312-C0R0
Weld Data Sheet for weld 15-B204-MDE-2569-FW001-C0R0
Weld Material Requisition Form for weld ID 15-B204-MDE-0001-V-2569
CMTR for Lot AT9897, Heat 745281
Welding Technique Sheet D1.6-GT-A-B-01 Rev.

Other IROFS Specific Documents

Glovebox PFF*GB9000
Work Packet DCS01-PFF-AG-WPK-M-3578-T01
Engineering Guideline EG-83 Subcritical Dimension Verification Tracking Rev. 0

Glovebox KDD*GB2000
Work Package 14-C335-KDD-GB-M-2140-06

Project Procedures (PPs)

PP01-58 Rev. 4, Weld Filler Material Control
PP09-39, Rev. 5, Verification of Subcritical Dimensions for Subcriticality Safety
PP10-37, Rev. 3, ICN03, Control of Issued Material
PP10-38, Rev. 2, ICN01, Storage and Control of Material
PP11-33, Rev. 0, Housekeeping and Work Area Cleanliness
PP12-40, Rev. 0, Preventive Maintenance of in-storage or Installed Equipment during the Construction Phase

Receipt Inspection Reports (RIRs)

RIR-16-1467, Part: BAP-L5-A11-10-MDE-09
RIR-12-1231, Part: BAP-L2-A12-15-MDE-04
RIR-16-1490, Part: BAP-L2-A12-17-HSA-01-PC-1A
RIR-15-1420, Part: BAP-L3-A9-04-HSA-04
RIR-15-1420, Part: BAP-L3-A9-04-HSA-14
RIR-16-1469, Part: BAP-L3-A9-04-HDE-08
RIR-12-35689, Part: VHD-8302001-08-Q1-01
RIR-12-36347, Part: VHD-8205003-04-Q1-01
RIR-12-38676, Part: VHD-8302001-07-Q1-01

Specifications

DCS01-ZMJ-DS-SPE-M-61501, Process Units and Gloveboxes Installation Specification

Work Packages and Packets

Work Package 16-B303-MDE-0016-V-5335-02

Work Packet B303-HV-03076