



BWX Technologies, Inc.

October 16, 2017  
17-085

ATTN: Mark S. Lesser, Director  
Division of Fuel Facility Inspection  
U.S. Nuclear Regulatory Commission, Region II  
Marquis One Tower  
245 Peachtree Center Ave. NE, Suite 1200  
Atlanta, GA 30303-1257

- References:
- 1) August 8, 2017(17-063) Letter from B. Joel Burch to NRC; 60 Day written Report for Event Notification number 52840
  - 2) September 7, 2017 (17-084) Letter from Mark S. Lesser to B. Joel Burch; BWXT Nuclear Operations Group-Nuclear Regulatory Commission Special Inspection Report Number 70-27/2017-007

Subject: 60-Day Report Additional Information

Dear Sir:

In Reference 1, BWXT NOG-L provided a summary of our investigation, risk assessment, and corrective actions related to the July 4, 2017 reportable event involving the accumulation of fuel in the two desiccant containers of the UAI<sub>x</sub> HEU Glovebox in our RTR manufacturing area. Commitments 1 and 7 of Reference 1 relate to improvements to the PHA/ISA process and procedures to identify and evaluate potential fuel accumulations and the adequacy of drawings and P&IDs to support our change management and ISA processes, respectively. In assessing these commitments, BWXT NOG-L Management has determined that although compliance with Part 70 requirements has been maintained, there is an opportunity to improve our safety design basis documentation, particularly in the area of revision controlled Nuclear Criticality Safety Evaluations.

In 2014, BWXT NOG-L began a process of replacing multiple Nuclear Criticality Safety Evaluations with a single revision controlled Process Analysis (PA). Approximately 100 PAs need to be created and since that date BWXT NOG-L has developed 7 PAs and implemented 5. The PAs represent a significant improvement in our process safety documentation, eliminating the revision control issues described on pages 15-16 of Reference 2. At this time, BWXT NOG-L Management plans to accelerate the PA development effort. BWXT NOG-L has begun the process of hiring additional Nuclear Criticality Safety Engineers and qualified contractors to support this effort. Our plan is to acquire the resources in early 2018 and quickly move forward. This initiative is in addition to the corrective actions described in Reference 1 and represents BWXT NOG-L's long term goal to improve the documented safety basis in the ISA and prevent reoccurrence of the identification of an unanalyzed condition similar to the RTR event.



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My staff will keep your management and inspectors up-to-date on our progress during routine inspections.

If you have questions or require additional information, please contact Chris Terry, Manager of Licensing and Safety Analysis, at [cterry@bwxt.com](mailto:cterry@bwxt.com) or 434-522-5202.

Sincerely,

A handwritten signature in black ink, appearing to read 'B. Joel Burch'. The signature is fluid and cursive, with a large initial 'B'.

B. Joel Burch  
Vice President and General Manager  
BWXT Nuclear Operations Group, Inc. – Lynchburg

cc: NRC, Regional Administrator, Region II  
NRC, Resident Inspector  
NRC, M. Baker