



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

April 19, 2019

EN 53869
EN 53892
EN 53895

Stephen Cowne, Chief Nuclear Officer
and Compliance Manager
URENCO USA
P.O. Box 1789
Eunice, NM 88231

SUBJECT: LOUISIANA ENERGY SERVICES, LLC (LES), dba URENCO USA (UUSA) –
NUCLEAR REGULATORY COMMISSION INTEGRATED INSPECTION REPORT
70-3103/2019-002

Dear Mr. Cowne:

This letter refers to the inspections conducted by the U.S. Nuclear Regulatory Commission (NRC) from January 1 through March 31, 2019, at the URENCO USA facility located in Eunice, New Mexico. The enclosed report presents the results of these inspections, which were discussed with you and members of your staff on March 28 and April 18, 2019.

These inspections examined activities conducted under your license, as they related to public health and safety, to confirm compliance with U.S. NRC rules and regulations and the conditions of your license. The inspection areas covered operational safety, criticality safety, and maintenance and surveillance. Within these areas, the inspections consisted of examinations of selected procedures and representative records, observations of activities, and interviews with personnel. No violations of more than minor significance were identified.

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 its enclosure will be made available electronically for public inspection in the NRC Public Document Room or from the NRC's Agencywide Documents Access and Management System (ADAMS), accessible from the NRC website at <http://www.nrc.gov/reading-rm/adams.html>.

If you have any questions regarding this matter, please contact me at (404) 997-4708.

Sincerely,

/RA/

Leonard W. Pitts, Acting Chief
Projects Branch 1
Division of Fuel Facility Inspection

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

Enclosure:
Inspection Report No. 70-3103/2019-002
w/Attachment: Supplemental Information

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SUBJECT: LOUISIANA ENERGY SERVICES, LLC (LES), dba URENCO USA (UUSA) –
 NUCLEAR REGULATORY COMMISSION INTEGRATED INSPECTION REPORT
 70-3103/2019-002

DISTRIBUTION:

L. Suggs, RII
 L. Pitts, RII
 B. Adkins, RII
 K. Sturzebecher, NMSS
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PUBLICLY AVAILABLE NON-PUBLICLY AVAILABLE SENSITIVE NON-SENSITIVE
 ADAMS: Yes ACCESSION NUMBER:ML19109A072 SUNSI REVIEW COMPLETE FORM 665 ATTACHED

OFFICE	RII:DFFI	RII:DFFI	RII:DFFI	RII:DFFI	RII:DFFI	RII:DRS/PSB	RII:DFFI	DC
SIGNATURE	/RA/	/RA/	/RA/	/RA/	/RA/	/RA/		/RA/
NAME	JRivera	NPeterka	PGlenn	LCooke	BAdkins	OSmith		LPitts
DATE	4/10/2019	04/09/2019	4/05/2019	4/10/2019	4/17/2019	4/18/2019		4/16/2019
E-MAIL COPY	YES NO	YES NO	YES NO	YES NO	YES NO	YES NO	YES NO	YES NO

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U. S. NUCLEAR REGULATORY COMMISSION
REGION II

Docket No.: 70-3103

License: SNM-2010

Report No.: 70-3103/2019-002

Licensee: Louisiana Energy Services (LES), LLC

Facility: URENCO USA (UUSA)

Location: Eunice, NM

Inspection Dates: January 1 through March 31, 2019

Inspectors: J. Rivera, Senior Fuel Facility Inspector (Sections A.1 and C.1)
N. Peterka, Fuel Facility Inspector (Section B.1)
P. Glenn, Fuel Facility Inspector (Section A.1)
O. Smith, Senior Physical Security Inspector (Section C.2)

Approved: L. Pitts, Acting Chief
Projects Branch 1
Division of Fuel Facility Inspection

Enclosure

EXECUTIVE SUMMARY

**Louisiana Energy Services, LLC (LES) dba URENCO USA (UUSA)
Nuclear Regulatory Commission
Integrated Inspection Report 70-3103/2019-002
January 1 – March 31, 2019**

Regional inspectors from the U.S. Nuclear Regulatory Commission (NRC) conducted announced inspections during normal shifts and in-office reviews. The inspectors observed safety-significant activities and equipment, walked down the facility, interviewed licensee personnel, and reviewed facility documents. There were no violations of more than minor significance identified during this inspection.

Safety Operations

- The inspectors reviewed a sample of activities in the operational safety area; no violations of more than minor significance were identified. (Section A.1)
- The inspectors reviewed a sample of activities in the nuclear criticality safety area; no violations of more than minor significance were identified. (Section A.2)

Facility Support

- The inspectors reviewed a sample of activities in the maintenance and surveillance area; no violations of more than minor significance were identified. (Section B.1)

Other Areas

- The inspectors performed follow-up inspection activities for Event Notification (EN) 53892, "Non-conservative Surveillance Frequency Calculation." This item is considered open pending the completion of the licensee's corrective action process and the submittal of a follow-up written report in accordance with 10 CFR 70.50. (Section C.1)
- The inspectors reviewed EN 53895, Security Event. This EN was subsequently withdrawn, and no violations of more than minor significance were identified. This item is considered closed. (Section C.2)

Attachment

Key Points of Contact
List of Report Items
Inspection Procedures Used
Documents Reviewed

REPORT DETAILS

Summary of Plant Status

The URENCO USA facility in Eunice, New Mexico, enriches uranium hexafluoride (UF₆) using gas centrifuge technology. During the inspection period, the licensee conducted routine plant operations.

A. Safety Operations

1. Operational Safety (Inspection Procedure 88020)

a. Inspection Scope

The inspectors evaluated the operational safety of the facility to verify the licensee operates the plant safely and in accordance with Title 10 Code of Federal Regulations (CFR) Part 70, the license, and the license application. The inspectors interviewed licensee staff and reviewed records associated with the product sub-sampling and product take-off processes to verify compliance with the Safety Analysis Report (SAR). The inspectors reviewed operating procedures and supporting technical documents associated with the sub-sampling and product take-off processes to verify that licensee's documents were consistent with the licensing basis of the facility.

The inspectors evaluated items relied on for safety (IROFS) 43 and 24b (sub-sampling process) and IROFSC21 (product take-off process) to verify they were adequately implemented as described in the Integrated Safety Analysis (ISA) and that the licensee was in compliance with SAR as incorporated by reference in Condition 10 of the materials license. The inspectors performed field walk-downs of the sub-sampling room (chemical laboratory) with approved procedures to verify the field configurations were maintained in accordance with the configuration control requirements of the SAR. The inspectors walked down the sub-sampling room to confirm that IROFS43 and IROFS24b were present and capable of performing their intended safety functions as required by 10 CFR 70.62. The inspectors interviewed chemistry technicians to verify they were knowledgeable of administrative controls and limits in accordance with the management measures description in the SAR.

The inspectors also observed an in-progress disconnection of a feed cylinder that required verification of IROFSC21. The inspectors observed this activity as a representative sample of similar operator activities that require the verification of IROFSC21 in the product take-off system. The inspectors interviewed and observed the operator to verify that he was knowledgeable of the IROFS function and followed the applicable operating procedure.

The inspectors reviewed procedures for both sub-sampling and product take-off processes to verify required actions for IROFS43, IROFS24b, and IROFSC21, as applicable, were correctly transcribed into written operating procedures consistent with the ISA Summary. The inspectors evaluated the procedures' contents with respect to operating limits and operator responses for upset conditions to verify the limits needed to assure safety were adequately described in the procedures. The inspectors also

reviewed completed surveillances and functional test instructions for IROFS43, IROFS24b, and IROFSC21 to verify management measures, as required by the ISA and the SAR, were implemented.

The inspectors reviewed training records regarding initial and continuing training programs to verify compliance with the training requirements of the SAR. The inspectors reviewed a sample of operator qualification records for IROFS to verify that the individuals were currently qualified on the systems and equipment to which they were assigned to operate and maintain.

The inspectors reviewed a sample of corrective action program (CAP) entries from the past 12 months to verify that safety-significant plant issues were entered in the program for resolution and adequate corrective actions were initiated. The review of corrective actions included the implementation of compensatory measures for unavailable IROFS. Additionally, the inspectors reviewed a sample of Audits and Self-Assessments in the Operations Area to verify that the licensee completed the assessments at the required frequency and entered significant audit findings into the CAP for resolution.

As part of the review of CAP entries, the inspectors focused on the corrective actions for EV 129970 associated with event notification (EN) 53869 reported to the NRC on February 11, 2019. The reported condition involved improperly calibrated measuring and testing equipment used to perform surveillance activities for several IROFS. The licensee retracted the EN on March 7, 2019, on the basis that none of the affected instruments was found out of calibration and therefore the performance requirements of 10 CFR 70.61 were met. The inspectors interviewed maintenance staff and reviewed the interim corrective actions taken by the licensee to verify operability of the equipment in question. The inspectors also independently reviewed the licensee's technical justification for retracting the event notification and the corrective actions to resolve the calibration equipment issue.

b. Conclusion

No violations of more than minor significance were identified.

2. Nuclear Criticality Safety (Inspection Procedure 88015)

a. Inspection Scope

Criticality Analysis

The inspectors reviewed selected Nuclear Criticality Safety Analyses (NCSAs) and associated assumptions and calculations to verify consistency with the commitments in the SAR, including consideration of the Double Contingency Principle (DCP), assurance of subcriticality under normal and credible abnormal conditions with the use of subcritical margin, technical practices and methodologies, and treatment of nuclear criticality safety (NCS) parameters. The inspectors reviewed the selected NCSAs to determine whether approved NCSAs were available, were of sufficient detail and clarity to permit independent review, and whether calculations were performed within the validated area of applicability and consistent with the validation report. The NCSAs were selected based on factors such as risk-significance, if new or revised, the use of unusual control

methods, and operating history. The NCSAs reviewed included NCSAs: CSA-13, CSA-16, CSA-22, and CSA-24, which covered various processes for the Solid Waste Collection Process and Product Take-off System.

The inspectors reviewed the licensee's generation of accident sequences to verify whether the NCSAs systematically identified normal and credible abnormal conditions for the analysis of process upsets in accordance with the commitments and methodologies in the SAR. This effort included the review of accident sequences that the licensee determined to be not credible in order to determine whether the bases for incredibility were consistent with the commitments, definitions, and methodologies in the SAR and were documented in sufficient detail to permit an independent assessment of credibility. This review was conducted for the following NCSAs: CSA-13, CSA-16, CSA-22, and CSA-24.

Criticality Implementation

The inspectors performed walk-downs of the Solid Waste Collection and Product Take-off systems to determine whether existing plant configuration and operations were covered by, and consistent with, the process description and safety basis in the NCSAs. The inspectors reviewed process and system descriptions and setpoint analyses to verify that engineered controls established in the NCSAs were included. The inspectors reviewed operating procedures and postings to verify that selected administrative controls established in the NCSAs were included. The inspectors interviewed operators and engineers to verify that administrative actions established in the NCSAs were understood and implemented properly in the field.

Criticality Operational Oversight

The inspectors reviewed training records for a recently hired licensee NCS staff member. The inspectors verified that this licensee NCS engineer was qualified in accordance with license commitments and that only qualified staff performed NCS-related audits.

The inspectors accompanied licensee NCS engineers on a general walk-down of the facility to determine whether NCS staff routinely inspected fissile material operations to ascertain that criticality requirements were being satisfied. Additionally, the inspectors accompanied an NCS engineer on an audit of the Chemistry Laboratory.

Criticality Programmatic Oversight

The inspectors reviewed the selected NCSAs listed above to verify they were performed in accordance with NCS program procedures and received appropriate independent review and approval.

Criticality Incident Response and Corrective Action

The inspectors reviewed selected NCS-related CAP entries to verify anomalous conditions were identified and entered into the CAP, proposed corrective actions were sufficiently broad, actions were prioritized on a schedule commensurate with their significance, and actions were completed as scheduled and addressed the problem identified.

b. Conclusion

No violations of more than minor significance were identified.

B. Facility Support

1. Maintenance and Surveillance (Inspection Procedure 88025)

a. Inspection Scope

The inspectors reviewed the licensee's maintenance and surveillance activities for IROFS and other safety controls to determine whether the licensee established an effective program to ensure IROFS remained available and reliable to perform their safety function when needed in accordance with 10 CFR Part 70.62 and Chapter 11, "Management Measures," of the SAR. Specifically, the inspectors reviewed work packages, observed pre-job planning and briefs, and observed maintenance activities to verify maintenance and surveillance activities for IROFS were performed to ensure the controls were maintained to meet the aforementioned requirement. The inspectors also interviewed licensee personnel to verify maintenance and surveillance program activities were performed in accordance with Section 11.2, "Maintenance," of the SAR.

The inspectors reviewed the licensee's maintenance and work control program to verify provisions were in place to ensure pre-job planning and preparation of work packages were conducted in accordance with licensee procedures and requirements. The inspectors observed maintenance shift turnover meetings and pre job briefs for maintenance activities to verify compliance with the maintenance program requirements.

The inspectors observed maintenance work activities on selected systems and processes to verify work activities were conducted in accordance with licensee requirements and approved procedures. The inspectors observed selected maintenance and surveillance activities. The inspectors reviewed work orders to verify work was properly controlled and authorized. The inspectors reviewed work instructions to verify they were accurate, contained the proper level of detail, and that post-maintenance testing and calibrations, as specified by license requirements, were performed prior to restoring the equipment to operational status.

The inspectors interviewed maintenance program management and staff regarding the training and qualification program for maintenance personnel performing work on safety related equipment. The inspectors reviewed the qualification records of seven maintenance staff to verify the individuals were qualified to perform their assigned maintenance activities.

The inspectors reviewed corrective actions associated with safety control failures or degradations to verify post-maintenance testing and calibrations were adequately performed prior to restoring equipment to operational status. Inspectors also reviewed six completed work packages to verify required reviews and approvals prior to returning equipment to service.

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 and whether corrective actions had been implemented as required.

b. Conclusion

No violations of more than minor significance were identified.

C. Other Areas

1. (Opened) EN 53892, Non-conservative Surveillance Frequency Calculation

a. Inspection Scope

On February 22, 2019, the licensee submitted EN 53892 associated with potential errors in the calculation that determines the periodicity for performing IROFSC22 surveillance. The inspectors reviewed the calculation in question to understand the reported condition and discussed the status of corrective actions with licensee staff. The inspectors' review included interim corrective actions to ensure safe operation of the plant.

b. Conclusion

The inspectors determined that the licensee was still in the process of evaluating the reported issue in accordance with its corrective action program. The cause evaluation and final corrective actions were not finalized pending the revision of calculations for IROFSC22. Therefore, the inspectors were unable to complete the review of this event notification. This item is considered open pending the completion of the licensee's corrective action process and the submittal of a follow-up written report in accordance with 10 CFR 70.50.

2. (Opened and Closed) EN 53895, Security Event (Retracted)

a. Inspection Scope

On February 23, 2019, the licensee submitted EN 53895 regarding a security event. This EN was subsequently withdrawn by the licensee on March 1, 2019 after discovering that the issue was not subject to the security reporting requirements. The inspectors reviewed the licensee response to this event.

b. Conclusion

No violations of more than minor significance were identified.

D. 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 28 and April 18, 2019 to S. Cowne, Chief Nuclear Officer and Compliance Officer, and other members of his staff. Proprietary information was discussed during the inspection but is not included in this report.

SUPPLEMENTAL INFORMATION

1. KEY POINTS OF CONTACT

<u>Name</u>	<u>Title</u>
S. Cowne	Chief Nuclear Officer (CNO)
S. Diggs	Security and Safeguards Manager
R. Kohrt	Engineering
S. Magill	Maintenance Manager
R. Medina	Acting Licensing Manager
Q. Newell	Programs Engineering Supervisor
A. Reidy	NCS Engineer
J. Richards	Maintenance
J. Rickman	Licensing Specialist
N. Wells	Quality Assurance & ECP Manager

2. LIST OF ITEMS OPENED, CLOSED, AND DISCUSSED

Opened

EN 53892 Non-conservative Surveillance Frequency Calculation (Section C.1)

Opened and Closed

EN 53895 Security Event (Section C.2)
EN 53869 IROFS M&TE Incorrectly Calibrated (Section A.1)

3. INSPECTION PROCEDURES USED

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

4. DOCUMENTS REVIEWED

Records:

32-2400503-01-LES Attachment I, ISA Consequence Assessments for Airborne Releases
Attachment I: CRDB Accident Scenarios, Revision (Rev.) 2
2018-A-02-005, Maintenance Audit Report, dated March 19, 2018
2019-A-02-003, Report for the Urenco USA (UUSA) Nuclear Criticality Safety Program
NQA-1 Audit, dated March 18, /2019
CALC-K-00015-Rev 1, Automatic Trip of the Autoclave Heater & Fan on Autoclave High
Internal Air Temperature, dated September 18, 2010
CALC-K-00018, Automatic Trip of Sub-Sample System Heaters on High Internal Air
Temperature (IROFS43), dated March 7, 2012
Learner Transcript – ORM/IROFS Training and Qualification
ETC4078617, Criticality Safety of the Leybold WS1001/WS251 Product and Tails Roots
Pump Sets for the UUSA Facility, Rev. 8
NCS-CSA-013, Nuclear Criticality Safety Analysis of 55 gallon waste drums, Rev. 3, dated
June 22, 2017

NCS-CSA-015, Nuclear Criticality Safety Analysis of IROFSC22 Periodicity, Rev. 8, dated December 21, 2017
 NCS-CSA-016, Criticality Safety Analysis of 30B Cylinders, Rev. 4, dated July 30, 2018
 NCS-CSA-022, Safe Spacing for SBD Waste Drums Involving Decontamination Activities, Rev.1, dated September 2, 2016
 NCS-CSA-024, Nuclear Criticality Safety Analysis of Chemical Trap Arrays, Rev. 0, dated January 25, 2019
 NCS-CSA-038, Enrichment Sensitivity Study for Simple Geometry, Rev. 0, dated February 19, /2019
 NCSI-19-003, UF6 Handling Area SBM-1003, dated January 18, 2019
 NCSI-19-004, SBM1005 UF6 Area, dated January 25, 2019
 NCSI-19-007, IROFS58a/b (and Oil Waste), dated February 15, 2019
 NEF-BD-11, Automatic Trip of the Autoclave Heater and Fan on Autoclave High Internal Air Temperature (RTD), Rev. 5
 NEF-BD-24b, Establish GEVS Flow for Sample Handling or Transfer, Rev. 4
 NEF-BD-43, Automatic Trip of Sub-Sampling System Hotbox Heaters on High Temperature, Rev. 5
 NEF-BD-C21, Flow Restriction for Vacuum Pumps Used for Sampling or Evacuation, Rev. 6
 NEF-BD-31a, Limit Uranic Mass Inventory in Non-Safe By Design Solid Waste Containers, Rev. 9
 NSR-2016-005, IROFS31 Series Operations – Bulking Enriched Material, Rev. 1
 OP-3-1000-09-F-1, Operability Evaluation for EV 129970, dated February 13, 2019
 ORM C21, Flow Restriction for Vacuum Pumps Used for Sampling or Evacuation, Rev. 2
 OSIROFSQC00I00, Operations Training Program – Items Relied on for Safety and Operating Requirements Manual, Rev. 8
 SA-2018-002, Assessment of Activities Associated with Maintaining IROFS, dated December 28, 2018
 SSA-2018-005, Maintenance Self-Assessment, dated February 23, 2018
 Shift Operator Standing Orders, dated February 21, 2019
 UPD0202978B, Cylinder Rupture Temperature, dated May 4, 2004
 WO 1000104081, SBM4: Install C21 Orifice, dated June 21, 2013

Procedures:

CA-3-1000-09, Assessment Program, Rev. 13
 CH-3-1050-01, Chemistry Surveillance, Rev. 3
 CH-3-2070-01, Sub Sampling of UF6, Rev. 3
 CR-2-1000-01, Nuclear Criticality Safety Program Description, Rev. 9
 CR-3-1000-01, Verification for Implementation of NCS Evaluations and Analyses, Rev. 7
 CR-3-1000-03, Criticality Safety Walkthrough, Rev. 13
 E-NCS-CP, NCS Criticality Engineer Demonstration of Continued Proficiency, Rev. 2
 E-NCS-CS-QG, Nuclear Criticality Support Staff, Rev. 1
 MA-2-1000-01, Conduct of Maintenance, Rev. 2
 MA-2-1000-02, Preventative Maintenance Program, Rev. 1
 MA-2-1000-03, Surveillance Program, Rev. 8
 MA-3-3400-11, IROFS11 Autoclave Heater and Fan High Temperature Trip – RTD Surveillance, Rev. 10
 MA-3-3400-13, IROFS43 Sub Sampling Rig High Temperature Trip – RTD Surveillance, Rev. 9
 OP-3-0410-01, Disconnecting a Feed Cylinder, Rev. 52
 TQ-3-0100-13, Training and Qualification Guidelines, Rev. 8
 OP-3-0420-01, Product System, Rev. 47

QA-3-2000-01, Quality Assurance Audit, Rev.20
 WC-3-1000-02, Work Package – Initiation through Closure, Rev. 30
 WC-4-1000-02, Conduct of Pre and Post Job Briefs, Rev. 6

Condition Reports Written as a Result of the Inspection:

EV 131657, Lauda Stage II Pressure Switch Setpoints Changed Without Operations
 Concurrence, dated March 28, 2019
 EV 131658, Revise MA-6-2000-04, Annual LAUDA Mechanical Maintenance, dated March
 28, 2019
 EV 131664, Incorrect Jofra Calibration Results in Minor Violation, dated March 28, 2019
 EV 131665, IROFS24b Not Specific for Chemistry Actions, dated March 28, 2019
 EV 131666, Error in IROFS43 Setpoint Calculation and Surveillance Procedure, dated
 March 28, 2019

Condition Reports Reviewed:

EV 126389, IROFSC21 Orifice Verification, dated July 18, 2018
 EV 126491 Calculation Error IROFS 54A/B, dated August 1, 2018
 EV 126523, Increase in IROFS Related Event Reports, dated August 7, 2018
 EV 126679, Valve leak by while performing IROFS10, dated August 27, 2018
 EV 127121, IROFS43 Alarm Indications Can Be Masked, dated October 24, 2018
 EV 129953, Questions Regarding Calibration of ATC-1 and ATC-2, dated February 8, 2019
 EV 129970, IROFS M&TE Incorrectly Calibrated, dated February 11, 2019
 EV 130061, IROFSC22 NCSA (NCS-CSA-015) Has Non-Conservative Periodicities, dated
 February 21, 2019
 EV 130122
 EV 131540, BCI UUSA Significant Damage Cause During Wind Storm, dated March 13,
 2019

Other Documents:

Work Packages

1000352062, IROFS43 Surveillance, dated October 28, 2018
 1000352063, IROFS43 Surveillance, dated October 28, 2018
 1000353100, SBM2: 434-2MT3 IROFS Alarm, dated August 7, 2018
 1000358403, SBM3: 434-IROFS Trip, dated September 19, 2018
 1000363777, IROFS 1 & 2, dated January 10, 2019
 1000370894, 1FP2 Lauda Mech Maint, dated March 1, 2019
 1000371859, 6M: Autoclave Mech Inspection, dated April 1, 2019
 1000374981, SBM3: 3T1 IROFS2 Repair, dated January 18, 2019
 1000382266, UN-NEF-1610-611-4U1, Rev. 0