Rivera Ortiz, Joel

From: Rivera Ortiz, Joel
Sent: Friday, September 20, 2019 9:40 AM
To: Ollis, Phillip D. (GE Power)
Cc: Stamm, Eric (Eric.Stamm@nrc.gov); Adkins, Brannen (Brannen.Adkins@nrc.gov); Womack, Roland
Subject: Document Request: NRC Inspection on 10/21/19
Attachments: Document Request GNFA OPS-NCS-PPM-RP 2019004.pdf

Dear Mr. Ollis,

The NRC will conduct a routine inspection at the Global Nuclear Fuels – Americas, Inc. facility the week of October 21, 2019. The inspection will implement the following NRC inspection procedures (IPs):

IP 88015 – Nuclear Criticality Safety (Brannen Adkins)
IP 88020 – Operational Safety (Eric Stamm)
IP 88030 – Radiation Protection (Roland Womack)
IP 88070 – Plant Modifications – Annual (Joel Rivera)

This email requests a number of documents that we would like to obtain for our preparation activities (see attachment). If practical, we would like to have the documents at least a week prior to the inspection to facilitate our preparation and be able to conduct a productive inspection. You can provide the documents in hard copy or electronic format. In the attachment, we also specified some items that we will need during the on-site inspection week.

If you have any questions or concerns regarding this request, please contact me to discuss.

Best Regards,

Joel Rivera-Ortiz
Sr. Fuel Facility Inspector
U.S. Nuclear Regulatory Commission/Region-II
Division of Fuel Facility Inspection
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This letter contains mandatory information collections that are subject to the Paperwork Reduction Act of 1995 (44 U.S.C. 3501 et seq.). The Office of Management and Budget (OMB) approved these information collections (approval number 3150-0009). Send comments regarding this information collection to the Information Services Branch, Office of the Chief Information Officer, Mail Stop: O-1F13, U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by e-mail to Infocollects.Resource@nrc.gov, and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202, (3150-0009) Office of Management and Budget, Washington, DC 20503.

Document Request for NRC Inspection

Facility:	Global Nuclear Fuels – Americas (GNF-A), LLC
Docket Number:	07001113
Inspection Dates:	October 21 – 25, 2019
Inspection Report No.:	2019004
Inspection Procedures & Lead Inspectors:	IP 88015 – Nuclear Criticality Safety (Brannen Adkins) IP 88020 – Operational Safety (Eric Stamm) IP 88030 – Radiation Protection (Roland Womack) IP 88070 – Plant Modifications – Annual (Joel Rivera)
NRC Team Lead:	Joel Rivera Sr. Fuel Facility Inspector U.S. NRC/Region-II 404-997-4825 Joel.Rivera-Ortiz@nrc.gov

IP 88015 – Nuclear Criticality Safety (NCS)

Documents Requested for In-Office Preparation

1) Any new and revised NCS program procedures in the last 12 months (if none, please indicate)

2) List of Corrective Action Program entries in the last 12 months related to NCS issues, including the criticality accident alarm system (CAAS)

3) Copy of the following NCS-related analyses:
   - Criticality safety evaluations/analyses (CSEs/CSAs) covering the GAD grinder (Node Group 505) and the GAD press (Node Group 503) processes
   - Any new or revised CSEs & CSAs since the last NRC inspection in the NCS area

4) Internal program procedures for NCS weekly and internal audits, NCS engineer qualification, and CSE/CSA development

5) List of any new qualifying/qualified NCS staff since the last NRC inspection in this area

6) Audit(s) and self-assessment(s) of the NCS program since the last NRC inspection in this area

7) Training materials/exam on NCS for personnel who handle special nuclear material (SNM)

8) Training material on NCS as part of the 2019 General Employee Training (GET)

9) Emergency response procedure and training material for evacuation in the event of a criticality accident scenario

10) Validation report for NCS computer codes (if revised since the last inspection)

11) Procedures for the functional test, response, and calibration of the CAAS

Documents/Support Requested for On-site Inspection

1) Results of NCS inspections (a.k.a. weekly assessments/walkdowns) since the last NRC inspection in this area

2) Qualification and training records for any newly qualified/qualifying NCS engineers (if applicable)

3) CAAS maintenance (work orders)/testing/calibration records for the last 12 months

4) CAAS vendor/design information showing 2 of 3 detector logic, emergency power/uninterruptible power supply (UPS), and detector coverage

5) Logistic support to accompany an NCS engineer in a weekly walk-down (date, time, process area, and point of contact)

6) Coordinate an interview with the NCS manager, preferably in the morning of Tuesday, October 22, 2019.

IP 88020 – Operational Safety

Documents Requested for In-Office Preparation

1) Latest version of the ISA Summary, if different from Revision 22

2) Latest version of the License Application, if different from the version dated April 16, 2019.

3) Copy of the governing procedure for the management of items relied on for safety (IROFS)

4) Copy of the governing procedures for the implementation of the following management measures, as applicable to IROFS:

   - Configuration Management (Change Control)
   - Maintenance
   - Training and Personnel Qualifications
   - Procedures
   - Audits and Assessments
   - Incident Investigations
   - Other Quality Assurance (QA) Elements
   - Functional Tests
   - Calibration
   - Surveillance/Monitoring

5) List of corrective action program entries generated in the last 12 months related to problems with IROFS. Please include a brief description of the problem, if practical.

6) List of changes implemented in the last 12 months that affected IROFS; including modifications of existing controls, elimination of previous controls, and addition of new controls. Please provide just the changes that are not discussed in your document titled "Revised Integrated Safety Analysis Summary - Listing of All Changes Made During 2018," dated January 29, 2019.

7) List of changes in the Operations Safety organization in the last 12 months that were subject to the position-specific requirements of the license

8) List of temporary compensatory measures put in place in the last 12 months to support deficiencies in IROFS. Please include a brief description of the compensatory measure, if practical.

9) Copy of the most recent self-assessment and/or audits report in the area of Operational Safety with respect to the implementation of IROFS and safety controls

10) List of any failed/degraded IROFS or IROFS tests since the last NRC inspection in the area of Operational Safety

11) List of any internal events (e.g., unusual occurrences, non-routine events, or reportable events) in the past 12 months

12) List of areas/processes that will not be operating during the inspection

13) Schedule of IROFS-related surveillances/testing for the inspection week

14) Any infrequently performed tasks or evolutions scheduled to be performed during the inspection week

Documents/Support Requested for On-site Inspection

1) The inspectors will select a sample of safety controls for review based on the information provided for In-Office Preparation. For the selected safety controls (IROFS), please provide:

   a. Plant procedures showing the specific implementation of the IROFS

   b. Procedures and records of recent activities performed to demonstrate functionality of the IROFS (e.g. testing, inspection, calibration, preventive maintenance, etc.)

   c. Examples of training procedures and records showing that training requirements for the selected IROFS have been maintained

   d. Complete configuration management package for recent changes affecting the selected IROFS

2) Site support to conduct plant tours and observe ongoing operations in the control room and other production areas

3) Site support to coordinate interviews with plant operators

4) Site support to attend the “plan of the day” meetings

5) During the inspection, please keep inspectors informed of changes in plant operations, including updates to the areas/processes that will not be operating during the inspection and infrequently performed tasks or evolutions

6) Inform the inspectors of any updates to the Operational Safety program that have occurred since this document request was issued

7) Updated schedule of IROFS-related surveillances/testing for the inspection week

8) Time/location of plan of the day or shift turnover meetings

IP 88015 – Radiation Protection (RP)

****NOTE**** This inspection has been rescheduled twice in 2019 and the NRC inspectors acknowledge that GNF-A staff has already provided most of the information via an electronic reading room. For the information requested below, please provide any updates between June and September 2019.

Documents Requested for In-Office Preparation

1) Organization chart for program areas to be inspected along with names and contact information of key licensee personnel needed during the onsite inspection. Please note any personnel changes within the last 16 months.

2) List of condition reports for last 16 months (or since the last inspection)

3) Copy of independent audits, self-assessments, or QA surveillances performed since the last inspection pertaining to radiation protection activities.

4) Copy of the As Low as Reasonably Achievable (ALARA) Program document, including program results, future planning, and ALARA Committee or plant safety committee meeting records/minutes

5) Procedures relating to calibration and set point verification for liquid and gaseous effluent monitors

6) Procedures related to:
   - ALARA Program (for compliance with 10 CFR 20.1101(b))
   - Respiratory Protection Program (for compliance with 10 CFR 20.1703)
   - Radiological posting and access controls for airborne areas
   - Airborne Radioactivity Monitoring (for compliance with 10 CFR 20.1701 and 1702)
   - Air Sampling (for compliance with 20.1902(d))
   - Ventilation program, if applicable
   - Respirator Fit Testing
   - Whole Body Counting
   - Dose Limits and Administrative Control Levels (workers, minors, public, declared pregnant workers)
   - Dosimetry program for compliance with 10 CFR 20.1502(a) and 10 CFR 20.1501(c)
   - Personnel TLD Monitoring Program
   - Radiological Dose Reports

7) Records for air sampling (for compliance with 10 CFR 10.2103(b))

8) Records for dose results for workers, minors, & the public (TEDE, LDE, and SDE) as per 10 CFR.20.1201, .1207, .2104, and .2106

9) Records for internal dose results as per 10 CFR 20.1204 and 10 CFR 120.1502(b)

10) Records for bioassay program (for compliance with 10 CFR 20.2103(b)(3)

11) Records of any significant radiological events within the last 16 months

12) During the inspection, request opportunities to observe any scheduled maintenance activities involving RP job coverage.

13) Personnel to assist the NRC inspector(s) during an initial walk-through inspection of the facility, focusing on radiological equipment, radiological areas in the laboratories, new radiological areas decontamination areas.

Documents/Support Requested for On-site Inspection

1) Site support to conduct plant walk-downs and interviews with pertinent staff

IP 88070 – Permanent Plant Modifications

Documents Requested for In-Office Preparation

1) Copy of the procedure for the configuration management system required per 10 CFR 70.72

2) Copy of the governing procedures for the implementation of management measures for the configuration management system (e.g. post-modification testing, audits, training and qualification, records retention)

3) Copy of the procedure used to implement changes to the license application

4) List of plant modifications that were fully approved or implemented after January 29, 2019

5) List of Corrective Action Program entries in the last 12 months related to plant modification issues

6) Copy of latest self-assessment or audit for the configuration management system

Documents/Support Requested for On-site Inspection

1) Complete modification packages for the plant modifications selected for review

2) Site support to conduct plant walk-downs of selected modifications and interviews with pertinent staff