



Global Nuclear Fuel

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M190200

November 8, 2019

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555-0001

Subject: GNF-A Written Follow-up Report – NPDES Bypass

References: 1) NRC License SNM-1097, Docket 70-1113
2) GNF-A Event Report 54267, 9/11/2019

Dear Sir or Madam:

In accordance with 10 CFR 70.74(b), Global Nuclear Fuel–Americas, LLC (GNF-A) hereby submits a written follow-up report for Event Notification 54267 that was provided to NRC on September 11, 2019 (Reference 2).

Event 54267

As discussed in the initial event report, GNF-A reported a National Pollutant Discharge Elimination System (NPDES) permit nonconformance. Consistent with 10 CFR 70, Appendix A(c), a concurrent report was provided to NRC and is included as Attachment 1 to this letter.

Additional information is provided as follows:

Event Details and Safety Significance

On September 3, 2019, in preparation for Hurricane Dorian, the Waste Treatment Operator in Responsible Charge (ORC) decided to lower the level in the Waste Treatment Central Lagoon by treating and transferring water to the Process Lagoons. Piping was damaged and not noticed during a walkdown prior to pumping from Waste treatment to the Process Lagoons. This resulted in water being discharged to the soil. After discussing the event with State authorities, due to the potential severe weather impacts, the North Carolina Division of Water Resources (NC DWR) 5-day bypass report was allowed to be submitted on September 11, 2019.

Immediate Corrective Actions Taken

Upon discovery, the water was contained and sampled. Sample results were all below regulatory limits and the pipe was repaired. The NPDES permit requires a report to NC DWR. This report was made at 10:01 am on September 11, 2019. Because NC DWR was notified, a concurrent notification to the NRC Operations Center was made per 10 CFR 70, Appendix A(c)..

Probable Cause of Event

The cause of the cut to the lay flat hose is unknown but suspected to be lawn mowing equipment. The hose was not marked for protection in its routing along the ground. The line is typically not pressurized so any damage was not immediately noticeable.

Short Term Corrective Actions

- 1) The water was contained and sampled. Sample results were all below regulatory limits.

Completed September 3, 2019

- 2) Repaired cut bypass hose

Completed September 3, 2019

Longer Term Corrective Action

- 1) Install and commission a new permanent line and discontinue use and dispose of the temporary bypass hose

Scheduled completion: January 17, 2020.

If you have any questions regarding this matter, please contact me at (910) 819-5950.

Sincerely,


Scott Murray, Manager
Facility Licensing

Attachments: 1) Event 54267 Notification Description

cc: NRC Region II Administrator, Atlanta, GA
M. Ruffin, NRC RII Atlanta. GA
M. Bartlett, NRC NMSS, Washington, DC
SPM 19-030

Attachment 1

Event 54267 Notification Description

In preparation for Hurricane Dorian, the Waste Treatment Operator in Responsible Charge (ORC) decided to lower the level in the Waste Treatment Central Lagoon by treating and transferring to Process Lagoons. Piping was damaged and not noticed during a walkdown prior to pumping from waste treatment to the process lagoons. This resulted in water being discharged to the soil.

Upon discovery, the water was contained and sampled. Sample results were all below regulatory limits. The pipe was repaired. The NPDES permit requires a report to North Carolina Division of Water Resources (NC DWR). This report was made at 10:01 am on 9/11/2019. Because NC DWR was notified, a concurrent notification to the NRC Operations Center is being made per 10 CFR 70, Appendix A(c).

Phillip Ollis,
Facility Licensing
14:04 9/11/2019