

UNITED STATES NUCLEAR REGULATORY COMMISSION REGION II 101 MARIETTA STREET, N.W. ATLANTA, GEORGIA 30323

JUN 1 6 1986

Report No.: 70-1201/86-03

Licensee: Babcock and Wilcox Company Commercial Nuclear Fuel Plant Lynchburg, VA 24505

Docket No.: 70-1201 (CNFP)

License No.: SNM-1168

Facility Name: Commercial Nuclear Fuel Plant

Inspection Conducted: June 2-3, 1986

Inspector: Efmcalpine

Approved by: E. J. McAlpine, Chief, Material Control and Accountability Section, Nuclear Materials Safety and Safeguards Branch Division of Radiation Safety and Safeguards

6/16/86 Date Signed

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SUMMARY

Scope: This was a routine, unannounced inspection in the areas of management organization and controls, training, nuclear criticality safety, operations review and maintenance and surveillance.

Results: No violations or deviations were identified.

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REPORT DETAILS

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1. Persons Contacted

- *R. A. Alto, Plant Manager
- *K. E. Shy, Health Physicist
- *W. T. Engelke, Manager, Quality Assurance
- *B. W. Pugh, Manager, Production and Material Control
- *J. P. Watters, License and Control Administrator
- *D. V. Ferree, Manager, Manufacturing
- *D. W. Zeff, Manager, Operations Support

The inspector also interviewed several other licensee employees.

*Attended exit interview

2. Exit Interview

The inspection scope and findings were summarized on June 3, 1986, with those persons indicated in paragraph 1 above. The inspector described the areas inspected and discussed in detail the inspection findings. No dissenting comments were received from the licensee.

Licensee management made an oral commitment regarding the nuclear criticality safety training of personnel who are responsible for the handling and storage of special nuclear material (see paragraph 4).

The licensee did not identify as proprietary any of the materials provided to or reviewed by the inspector during this inspection.

- 3. Management Organization and Control (88005)
 - a. A change to the facility organization was implemented on May 1, 1985. The Plant Manager continues to function in the position of Manager, Safety and Licensing, as reported to the NRC on April 1, 1985. A license amendment application was submitted to NRC on February 5, 1986, to reflect the current organization and the redefinition of certain areas of responsibilities. NMSS discussed the proposed amendment with the licensee during a visit to the plant on March 11, 1986. By letter, dated May 16, 1986, additional information regarding the amendment application was requested of the licensee by NMSS. No violations or deviations were identified.

- b. The inspector verified that quarterly safety review board meetings were held and that appropriate qualified members were present at the meetings. Reports of the meeting minutes were submitted to the Plant Manager. The minutes showed that a broad range of items relating to nuclear criticality, radiation, and industrial safety were discussed. No violations or deviations were identified.
- c. Nuclear criticality safety audits were conducted by the nuclear criticality safety specialists from B&W-LRC on a quarterly basis Reports were made to the Plant Manager as required by the license. Weekly audits were conducted by the Health Physicist. The records showed that no deficiencies were identified by the internal audit program. Licensee representatives stated that daily informal nuclear criticality safety audits were performed by the health-safety personnel as they performed their routine duties. No violations or deviations were identified.
- d. The inspector verified that the licensee has a system which establishes controls for preparing, reviewing, approving, issuing, and reviewing procedures. The following control procedures were reviewed by the inspector:

PC-1300, CNFP Procedure Numbering System PC-1330, Preparation and Approval of CNFP Administrative and Operative Procedures AS-1124, Preparation, Distribution, and Control of Health-Safety Procedures

The licensee also has a system for issuing and controlling temporary procedures. A master procedure file is maintained to provide an index of effective procedures. Also, responsibilities are established to assure that out-dated procedures are destroyed. The inspector verified that operating procedures were reviewed and approved by the health-safety personnel. No violations or deviations were identified.

4. Training/Retraining (88010)

In reviewing the retraining agenda for radiation workers, the inspector noted that nuclear criticality safety was not included. In discussing this matter with the licensee, a representative stated that the retraining was performed to the extent necessary to assure the maintenance of acceptable safety practices with emphasis placed on new or revised safety criteria or areas in need of reinforcement.

The licensee had interpreted the license application (Paragraph 6.2, Section V) to require the licensee to conduct retraining annually but could select the agenda upon safety retraining needs. The inspector's interpretation was that both radiation protection and nuclear criticality safety retraining were required. The interpretation by NMSS was that both radiation protection and nuclear criticality safety retraining were required but the content of the training could be varied in accordance with the licensee's needs.

Licensee management stated that the intent of the words in the license application was to vary the safety retraining content from radiation protection to nuclear criticality safety, if necessary. Further, they stated that this was the first time nuclear criticality safety had been omitted and it was a conscious management decision based on the fact that current operations involving special nuclear material were very limited compared to previous operations. However, if the NRC interpretation was to retrain radiation workers annually with respect to both radiation protection and nuclear criticality safety, then they would immediately conduct nuclear criticality safety retraining. Management made an oral commitment to the inspector that nuclear criticality safety retraining would be accomplished by July 31, 1986, and that in the next submittal to NMSS for a license amendment, the application would be revised to clarify that both radiation protection and nuclear criticality safety retraining would be conducted annually.

A computer printout of employee training was available to show the various types of training received by employees. An examination of the records for selected individuals showed that they had received safety retraining within the past year.

No violations or deviations were identified.

5. Nuclear Criticality Safety (88015)

One nuclear criticality safety review had been performed by the Nuclear Criticality Safety Group at the Lynchburg Research Center. This involved clarification of separation requirements of a four (4) inch slab of pellets and a shipping container of special nuclear material. There were no facility modifications which required analyses. During tours of the plant, the inspector observed that special nuclear material was stored and handled in accordance with operating procedures and nuclear criticality safety requirements. Areas were properly posted as required by the license. No violations or deviations were identified.

6. Operations Review

The inspector verified that the quantities of special nuclear material and source material at the plant site did not exceed the license limits. The inspector verified that the quantity of special nuclear material in the lab was below the licensee's limit. Discussions with operators showed that they were familiar with regulatory and procedural requirements. Operating procedures were available to operators. The working areas were clean and orderly. Housekeeping was above average. No violations or deviations were identified.

- 7. Maintenance and Surveillance
 - a. Maintenance work involving radiation and radioactive material is controlled by the use of the Radiation Work Permit. The inspector discussed with the Maintenance Supervisor the controls and methods used for controlling maintenance work with radioactive material. No violations or deviations were identified.
 - b. The inspector verified that the nuclear criticality safety evacuation alarm was calibrated and source checked in accordance with the licensee's procedures. No violations or deviations were identified.