

COMBUSTION ENGINEERING

November 9, 1988
LD-88-131

Docket No. 70-1100
License No. SNM-1067
CAL 88-23

Mr. W. T. Russell
Regional Administrator, Region I
U. S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406

Subject: C-E Nuclear Fuel Integrated Improvement Program (NFIIP)

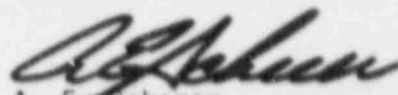
Dear Mr. Russell:

Attached is Revision 01 to Part 2 of the subject document with the status of the C-E commitments as of October 24, 1988. Revision 01 replaces the original issue of Part 2, dated October 20, 1988 in its entirety. To make Part 2 easier to use and understand, the findings have been re-ordered chronologically using the date of issue of the NRC Inspection Report, SALP Report or Tour. (The findings listed in Revision 01 have been renumbered sequentially and bear no relationship to the numbering on the original issue.) You will notice other cosmetic changes as well. Also attached is a "change page revision status" sheet which will be updated as revisions are issued and should be kept with your copy of the NFIIP.

If you have any questions, please feel free to contact me or Mr. John Conant of my staff at (203) 285-5002.

Very truly yours,

COMBUSTION ENGINEERING, INC.



A. E. Scherer
Director
Nuclear Licensing

AES:mbd

Attachment: As stated

cc: M. Austin (NRC - Region I)
G. Bidinger (NRC)
S. Ebner (NRC - Region I)
D. McCaughey (NRC)
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DATE: 11-9-88

CHANGE PAGE REVISION
STATUS TO REVISION 0
OF NFIP

<u>PAGE</u>	<u>REVISION</u>	<u>DATE</u>	<u>COMMENT</u>
<u>PART 1</u>	NONE		
<u>PART 2</u>			
ALL	1	10/24/88	Entire Part 2 (Now 95 pages) Reorganized chronologically

NUCLEAR FUEL INTEGRATED IMPROVEMENTS PROGRAM
PART 2 REVISION 3

DISPENSE	MRC FINDING (I.E., VIOLATION, OBSERVATION, ALLEGATION, RECOMMENDATION)	C-E COMMENT	COMMITMENT DATE	PART ONE CROSS REFERENCE	COMMENTS
1	MRC Inspection Report 70-1100/85-04 B-1B-86 through B-22-86 (Observation 1(a)) Potential for fire due to proximity of circulating machining waste & radioactive materials	10-88-036, 5-27-88, page 3 In order to reduce the risk of explosion and/or fire of the anhydrous ammonia tanks, a comprehensive preventive maintenance system will be completed by 12-31-88.	12/31/88	IV.B.6	The uranium oxide is stored in a NRC approved shipping container to reduce the fire potential.
2	MRC Inspection Report 70-1100/85-04 B-1B-86 through B-22-86 (Observation 1(d)) Potential for fire due to proximity of circulating machining waste & radioactive materials	10-88-036, 5-27-88, page 3 Evaluation of fire hazard completed by 12-31-88.	12/31/88	IV.C.3.a	

NUCLEAR FUEL INTEGRATED IMPROVEMENTS PROGRAM
PART 2 REVISION 1

NUMBER	NRC FINDING (I.E., VIOLATION, OBSERVATION, ALLEGATION, RECOMMENDATION)	C-E COMMITMENT	COMMITMENT DATE	PART ONE CROSS REFERENCE	COMMENTS
3	NRC Inspection Report 70-1100/86-04 8-18-86 through 8-22-86 Observation 2(a) Specific industrial safety policy/procedures do not exist.	1D-88-036, 5-27-88, page 7 Manufacturing operations are being reviewed and upgraded, implementation by 3-31-89.	03/31/89	IV.C.3	
4	NRC Inspection Report 70-1100/86-04 8-18-86 through 8-22-86 Observation 3(a) Bad housekeeping, including combustibles in Building 17 pellet shop, pellet shop annex, Building 5, etc.	1D-88-036, 5-27-88, page 8 Housekeeping is now improved. Adequacy of fire detectors will be assessed and fire detectors will be replaced as need. Complete by 3-31-89	03/31/89	IV.C.1.b IV.C.3	

NUCLEAR FUEL INTEGRATED IMPROVEMENTS PROGRAM
PART 2 REVISION 1

NUMBER	REQ. FINDING CLASS., VULNERABILITY, OBSERVATION, ALLEGATION, RECOMMENDATION	C-E COMMENT	COMMITMENT DATE	PART ONE CROSS REFERENCE	COMMENTS
5	NUC Inspection Report 70-1100/86-04 B-1B-86 through B-22-86 Observation 5(a) No routine inspection or comprehensive maintenance for arid/semi arid areas tanks.	LD-88-036, 5-27-88, page 9 A comprehensive preventive maintenance program will be implemented by 12-31-88.	12/31/88	IV.B.6	Maintenance on the tanks is performed
6	NUC Inspection Report 70-1100/86-04 B-1B-86 through B-22-86 Observation 7(a) Limited capability for meteorological information at Mirshar site.	LD-88-036, 5-27-88, page 11 Meteorological instrumentation will be installed on top of Building 4 by 3-31-89.	03/31/89	IV.C	This is part of the radiological equipment upgrade program.

NUCLEAR FUEL INTEGRATED IMPROVEMENTS PROGRAM
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NUMBER	NRC FINDING (I.E., VIOLATION, OBSERVATION, ALLEGATION, RECOMMENDATION)	C-E COMMITMENT	COMMITMENT DATE	PART ONE CROSS REFERENCE	COMMENTS
7	NRC Inspection Report 70-1100/B6-04 B-18-B6 through B-22-B6 Observation 7(c) Emergency Control Center is inadequate.	LD-88-036, 5-27-88, page 11 Building 4 will be designated the ECC by 3-31-89.	03/31/89	IV.C.4	
8	NRC Inspection Report 70-1100/B6-04 B-18-B6 through B-22-B6 Observation 7(c) Emergency action level used by NRC, Connecticut, and C-E Radiological Contingency Plan are not consistent.	LD-88-036, 5-27-88, page 11, 12 A matrix to cross reference various designations will be complete by 6-30-89.	06/30/89	IV.C.4	

OSAF CAR FUEL INTEGRATED IMPROVEMENTS PROGRAM
PART 2 REVISION 1

NUMBER	NRC FINDING (I.E., VIOLATION, CORRUPTION, ALLEGATION, RECOMMENDATION)	C-E COMMENTARY	COMPLETION DATE	PART ONE CROSS REFERENCE	COMMENTS
9	NRC Inspection Report 70-1100/B6-04 B-18 B6 through B-22 B6 Observation 7(f) An exercise of the the overall Winchour site emergency plan has never been conducted.	LD-BB-036, 5-27-88, page 12 A. evaluation of the postulated dose at the Building 17 boundary will be completed by 3-31-89.	03/31/89	IV.C.4	C-E will commence an evaluation of the site emergency plan, by 12/31/88.
10	NRC Inspection Report 70-1100/B6-04 B-18 B6 through B-22 B6 Observation 7(g) Security of emergency equipment lockers is not adequate.	Emergency equipment lockers are inspected monthly.	COMPLETED	IV.C.4	Relocation of lockers and equipment is in progress, with completion expected about 11/30/88.

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PART 2 REVISION 1

NUMBER	NRC FINDING (I.E., VIOLATION, OBSERVATION, ALLEGATION, RECOMMENDATION)	C-E COMMITMENT	COMMITMENT DATE	PART ONE CROSS REFERENCE	COMMENTS
11	NRC Inspection Report 70-1100/86-04 B-1B-86 through B-22-86 Observation 7(j) Written letter of agreement is not in place with one offsite support group.	1D-88-036, 5-27-88, page 14 letter with hospital that is alternate source of medical aid will be in place by 12-31-88.	12/31/88	IV.C.4	
12	NRC Inspection Report 70-1100/86-04 B-1B-86 through B-22-86 Observation 7(k) Qualifications and training for key emergency personnel have not been established	1D-88-036, 5-27-88, page 14 formal qualifications and training for emergency response personnel will be in place by 6-30-89.	06/30/89	IV.H.5.d	

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NUMBER	NRC FINDING (I.E., VIOLATION, OBSERVATION, ALLEGATION, RECOMMENDATION)	C-E COMMITMENT	COMMITMENT DATE	PART ONE CROSS REFERENCE	COMMENTS
13	NRC Inspection Report 70-1100/86-06 B-1B-86 through B-22-86 Observation 7(n) Emergency drills do not test all aspects of the emergency plans.	LD-88-036, 5-27-88, page 15 Accident training involving hazardous materials will be incorporated into the training for spill team members after training for handling of such materials is complete. This training will be complete by 12-31-88.	12/31/88	IV.C.4 IV.R.5.a IV.R.5.b	The facility presently drills twice a year. The drills currently involve fire, criticality, radiological aspects, communications, facility evacuation, and manning of the Emergency Control Center. The hazardous spill training will be added.
14	NRC Inspection Report 70-1100/86-06 B-1B-86 through B-22-86 Recommendation 1(c) Establish a fire protection program for Building 17, include installation of ionizing or photoelectric smoke detectors.	LD-88-036, 5-27-88, page 17 Adequacy of fire detectors will be assessed and detectors replaced as necessary by 3-31-89.	03/31/89	IV.C.3	

NUCLEAR 1071 INTEGRATED IMPROVEMENTS PROGRAM
PART 2 REVISION 1

REVISION	DESCRIPTION	C-E COMMENT	COMPLIMENT DATE	PART ONE CROSS REFERENCE	COMMENTS
15	NUC 1140/180 11 X., 9108 631100, 10054 REV 1100, REVISION, 01.0000000000000000 NUC Inspection Report 70-1100/05-04 6-15-86 through 6-22-86 Recommendation 1(c) Establish a fire protection program for Building 17, include daily collection and disposal of combustible trash, accumulated hydraulic fluids, and cleanup of spills.	10-05-036, 5-27-86, page 17 Procedures to address fire hazards will be completed by 6-30-89.	06/30/89	IV.C.3	
16	NUC Inspection Report 70-1100/05-04 6-15-86 through 6-22-86 Recommendation 2(a) Establish an industrial safety program, include specific industrial safety policies and procedures.	10-05-036, 5-27-86, page 17 Industrial safety program will be approved by 6-30-89.	06/30/89	IV.C.3 IV.B.5.a IV.B.5.b	

NUCLEAR FUEL INTEGRATED IMPROVEMENTS PROGRAM
PART 2 REVISION 3

NUMBER	NUC FINDING CLASS., VIOLATION, OBSERVATION, ALLEGATION, RECOMMENDATION(S)	C-E COMMENT	COMPLETION DATE	PART ONE CROSS REFERENCE	COMMENTS
17	NUC Inspection Report 70-1100/86-06 B-1B-06 through B-22-06 Recommendation 2(a) Establish an industrial safety program, include incorporation of industrial safety practices in manufacturing and operating procedures.	10-00-036, 5-27-86, page 17 An industrial safety program currently exists. It is currently being upgraded. This effort will be completed by 6-30-89.	05/30/89	IV.C.3 IV.B.5.A IV.B.5.B	
18	NUC Inspection Report 70-1100/86-06 B-1B-06 through B-22-06 Recommendation 3(a) Establish a program and implement procedures to ensure adequate housekeeping in Building 17 and Building 2.	10-00-036, 5-27-86, page 10 Program to assure appropriate housekeeping practices will be completed 12-31-88. This will include an evaluation of the adequacy of storage space and disposal practices.	12/31/88	IV.C.3 IV.C.3.b	

NUCLEAR FUEL INTEGRATED IMPROVEMENTS PROGRAM
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NUMBER	NRC FINDING (I.E., VIOLATION, OBSERVATION, ALLEGATION, RECOMMENDATION)	C-E COMMITMENT	COMMITMENT DATE	PART ONE CROSS REFERENCE	COMMENTS
19	NRC Inspection Report 70-1100/86-04 8-18-86 through 8-22-86 Recommendation 5(a) Establish an inspection/testing program and preventive maintenance program for the anhydrous ammonia tanks and associated equipment, sprinklers, and Building 17 process equipment.	LD-88-036, 5-27-88, page 19 A preventive maintenance program, including testing and inspection as appropriate, will be complete by 12-31-88.	12/31/88	IV.B.6	
20	NRC Inspection Report 70-1100/86-04 8-18-86 through 8-22-86 Recommendation 7(a) Evaluate the adequacy of the Emergency Control Center.	LD-88-036, 5-27-88, page 20 The adequacy of the existing emergency control center was evaluated, and it was decided that Building 4 will be designated as the alternative emergency control center by 3-31-89. It will be better equipped than the current center.	03/31/89	IV.C.4	

NUCLEAR FUEL INTEGRATED IMPROVEMENTS PROGRAM
PART 2 REVISION 1

NUMBER	NRC FINDING (I.E., VIOLATION, OBSERVATION, ALLEGATION, OR COMMENDATION)	C-E COMMITMENT	COMMITMENT DATE	PART ONE CROSS REFERENCE	COMMENTS
21	NRC Inspection Report 70-1100/86-04 8-18-86 through 8-22-86 Recommendation 7(b) Review the Radiological Emergency Plan to determine whether the Emergency Action Levels and the Classification Scheme need to be changed to be consistent w/ those used by the NRC and the State of CT.	10-88-036, 5-27-88, page 21 A matrix to cross reference the various designations will be completed by 6-30-89.	06/30/89	IV.C.4	
22	NRC Inspection Report 70-1100/86-04 8-18-86 through 8-22-86 Recommendation 7(b) Review the Radiological Contingency Plan to determine whether written agreements have been executed with and are understood by all required off-site support groups.	10-88-036, 5-27-88, page 21 Letters are in place with all but one organization, a hospital that is an alternate source of medical aid. A letter will be in place by 12-31-88.	12/31/86	IV.C.4	

NUCLEAR FUEL INTEGRATED IMPROVEMENTS PROGRAM
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NUMBER	NRC FINDING (I.E., VIOLATION, OBSERVATION, ALLEGATION, RECOMMENDATION)	C-E COMMITMENT	COMMITMENT DATE	PART ONE CROSS REFERENCE	COMMENTS
23	NRC Inspection Report 70-1100/86-04 8-18-86 through 8-22-86 Recommendation 7(b) Review the Radiological Contingency Plan to determine whether qualification and training for emergency response personnel have been established.	10-88-036, 5-27-88, page 21 Formal qualifications and training for emergency response personnel will be in place by 6-30-89.	06/30/89	IV.H.5.b IV.H.5.d	
24	NRC Inspection Report 70-1100/86-04 8-18-86 through 8-22-86 Recommendation 7(d) Demonstrate through drills that the Site Emergency Plan can be implemented for credible accidents.	10-88-036, 5-27-88, page 22 A review of all emergency plans and procedures will be initiated by 12-31-88.	6/30/89	IV.C.4	The commitment to initiate a review will be met by 12/31/88. Completion of the plans and procedures will be done by 6/30/89.

NUCLEAR FUEL INTEGRATED IMPROVEMENTS PROGRAM
PART 2 REVISION 1

NUMBER	NRC FINDING (I.E., VIOLATION, OBSERVATION, ALLEGATION, RECOMMENDATION)	C-E COMMITMENT	COMMITMENT DATE	PART ONE CROSS REFERENCE	COMMENTS
25	NRC Inspection Report 70-1100/86-04 8-18-86 through 8-22-86 Recommendation 7(d) Demonstrate through drills that the off-site groups can adequately respond to emergencies.	10-88-036, 5-27-88, page 22 A review of all emergency plans and procedures will be initiated by 12-31-88.	6/30/89	IV.C.4	The commitment to initiate a review will be met by 12/31/88 and plans and procedures will be in place by 6/30/89.
26	NRC Inspection Report 70-1100/86-04 8-18-86 through 8-22-86 Recommendation 7(d) Demonstrate through drills that all aspects of the emergency plan and procedures are adequate.	10-88-036, 5-27-88, page 22 A review of all emergency plans and procedures will be initiated by 12-31-88.	6/30/89	IV.C.4	The commitment to initiate a review will be met by 12/31/88 and plans and procedures will be in place by 6/30/89. Plans and procedures will be exercised to demonstrate adequacy.

NUCLEAR FUEL INTEGRATED IMPROVEMENTS PROGRAM
PART 2 REVISION 1

NUMBER	NRC FINDING (I.E., VIOLATION, OBSERVATION, ALLEGATION, RECOMMENDATION)	C-E COMMITMENT	COMMITMENT DATE	PART ONE CROSS REFERENCE	COMMENTS
27	NRC Inspection Report 70-1100/86-04 8-18-86 through 8-22-86 Recommendation 7(c) Install meteorological equipment at Windsor site.	ED-88-036, 5-27-88, page 22 Meteorological equipment will be installed by 3-31-89.	03/31/89	IV.C	this is part of the radiological protection equipment upgrade.
28	NRC Inspection Report 70-1100/87-01, Section 4.2 4-13-87 through 4-17-87 Item for future inspection The NRC inspector stated that there appears to be a program weakness in that there was no comprehensive instruction for the annual audits to provide to the audit teams regarding the scope and depth of audits.	C-E is developing an audit plan.	12/31/88	V.A.1	

NUCLEAR FUEL INTEGRATED IMPROVEMENTS PROGRAM
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NUMBER	NRC FINDING (I.E., VIOLATION, OBSERVATION, ALLEGATION, RECOMMENDATION)	C-E COMMITMENT	COMMITMENT DATE	PART ONE CROSS REFERENCE	COMMENTS
29	NRC Inspection Report 70-1100/87-02, Section 2 4-13-87 through 4-16-87 Apparent Violation 70-1100/87-02-01 The ERC inspection report states that C-E had not performed a management review and audit of its Measurements Control Program. The prior audit was performed on 11-11-85, 11-13-85, and 11-19-85.	Letter from H.V. Lichtenberger (C-E) to I. Martin (NRC) dated 7-27-87 and letter from D.L. Parks (C-E) to I. Martin (NRC) dated 8-26-87. C-E has implemented a scheduling calender to indicate which audits, reviews, and inventories are required, and completion dates. It is maintained by the Nuclear Materials Manager. The responsible parties will be notified in advance of the scheduled completion date.	COMPLETED	IV.C.1 IV.C.2 V.A.4	The Nuclear Materials Manager maintains a schedule calender.
30	NRC Inspection Report 70-1100/87-03, Section 2.a.1 6-1-87 through 6-5-87 The NRC inspection report states that empty incoming powder storage container area near the powder container weighing station was inadequately posted.	The powder container weighing station area has been reposted.	COMPLETED	IV.C.1.b	

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NUMBER	NRC FINDING (I.E., VIOLATION, OBSERVATION, ALLEGATION, RECOMMENDATION)	C-E COMMITMENT	COMMITMENT DATE	PART ONE CROSS REFERENCE	COMMENTS
31	NRC Inspection Report 70-1100/87-03, Section 2.b 6-1-87 through 6-5-87 The NRC inspection report states that flammable liquid storage cabinets were filled to capacity. This was questioned because of the potential fire problems.	The storage of excess liquids will be re-examined and unneeded liquids removed from the pellet shop.	11/30/88	IV.C.5	Vendor is in process of removing material from the facility
32	NRC Inspection Report 70-1100/87-03, Section 2.c 6-1-87 through 6-5-87 The NRC inspection report states that emergency egress from the rod endcap welding area of the pellet shop had been impeded following installation of walls around pellet stacking area downdraft tables	Emergency egress routes from the rod endcap welding area of the pellet shop will be evaluated and corrective actions taken as necessary.	11/30/88	IV.C.4	

NUCLEAR FUEL INTEGRATED IMPROVEMENTS PROGRAM
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33	NRC Inspection Report 70-1100/87-03, Section B 6-1-87 through 6-5-87 Re: Hooded area decontamination The NRC Inspection Report states that soil samples that are being analyzed to assure that soil contains < 30 picocuries/gram of uranium must account for U-234, U-235, and U-238.	C-E is analyzing soil to assure that it contains < 30 picocurie/gram, including U-234, U-235, and U-238.	11/30/88	NOT ADDRESSED	The soil analysis is complete. The report is being finalized. This item was report twice (as numbers 90 and 122) in the 10-20-88 printout of this database.

NUCLEAR FUEL INTEGRATED IMPROVEMENTS PROGRAM
PART 2 REVISION 1

NUMBER	NRC FINDING (I.E., VIOLATION, OBSERVATION, ALLEGATION, RECOMMENDATION)	C-E COMMITMENT	COMMITMENT DATE	PART ONE CROSS REFERENCE	COMMENTS
34	Letter from W.F. Russell (NRC) to P.L. McGill (C-E) dated 1-25-88 Re: PSC Inspection Report 70-1100/87-05 10-5-87 through 10-9-87 and 10-19-87 through 10-23-87 Violation A The NRC Inspection Report states that C-E failed to immediately cleanup contamination in excess of 10,000 dpm in pellet shop. Levels as high as 160,000 dpm were observed.	Letter from P.L. McGill (C-E) to James Lieberman (NRC) dated 2-23-88. C-E has taken corrective action. 1. Additional temporary decontamination personnel were brought in. 2. An improved method for monitoring contamination and identifying corrective actions has been implemented. 3. Additional contamination control instructions have been written. These are used in training program for all pellet shop personnel.	COMPLETED	IV.C.1 IV.C.1.a.5 IV.H.2	

NUCLEAR FUEL INTEGRATED IMPROVEMENTS PROGRAM
PART 2 REVISION 1

NUMBER	NRC FINDING (I.E., VIOLATION, OBSERVATION, ALLEGATION, RECOMMENDATION)	C-E COMMITMENT	COMMITMENT DATE	PART ONE CROSS REFERENCE	COMMENTS
35	Letter from W.T. Russell (NRC) to P.L. McGill (C-E) dated 1-25-88 Re: NRC Inspection Report 70-1100/87-05 10-5-87 through 10-9-87 and 10-19-87 through 10-23-87 Violation B The NRC Inspection Report states that C-E failed to use engineering controls, to the extent practicable, to limit concentrations of radioactive material in the air below those which delimit an airborne radioactivity area as defined in 10 CFR 20.203. Hoses in equipment associated w/ pellet manufacture were not properly maintained.	Letter from P.L. McGill (C-E) to James Lieberman (NRC) dated 2-23-88. C-E has taken corrective action. All damaged hoses have been replaced	COMPLETED	IV.B.6	

NUCLEAR FUEL INTEGRATED IMPROVEMENTS PROGRAM
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NUMBER	NRC FINDING (I.E., VIOLATION, OBSERVATION, ALLEGATION, RECOMMENDATION)	C-E COMMITMENT	COMMITMENT DATE	PART ONE CROSS REFERENCE	COMMENTS
36.	Letter from W.L. Russell (NRC) to P.L. McGill (C-E) dated 1-25-88. Re: NRC Inspection Report 70-1100/87-05 10-5-87 through 10-9-87 and 10-19-87 through 10-23-87 Violation B The NRC Inspection Report states that C-E failed to use engineering controls, to the extent practicable, to limit concentrations of radioactive material in the air below those which delimit the airborne radioactivity area as defined in 10 CFR 20.203. Hoses in equipment associated w/ pellet manufacture were not properly maintained.	Letter from P.L. McGill (C-E) to James Lixberman (NRC) dated 2-23-88. C-E has initiated an upgrade program to refurbishing existing equipment and remove layers of interim fixes.	COMPLETED	IV.B.6	

NUCLEAR FUEL INTEGRATED IMPROVEMENTS PROGRAM
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P/2/GER	NRC FINDING (I.E., VIOLATION, OBSERVATION, ALLEGATION, RECOMMENDATION)	C-E COMMITMENT	COMMITMENT DATE	PART OR CROSS REFERENCE	COMMENTS
37	Letter from W.L. Russell (NRC) to P.L. McGill (C-E) dated 1-25-88 Re: NRC Inspection Report 70-1100/87-05 10-5-87 through 10-9 7 and 10-19-87 through 10-23-87 Violation C The NRC Inspection Report states that C-E failed to make suitable measurements of the concentrations of radioactive materials in the air; samples were not representative of the air breathed by employees.	Letter from P.L. McGill (C-E) to James Lieberman (NRC) dated 2-23-88. C-E committed to improved air sampling program. Additional 82s have been purchased.	COMPLETED	IV.C.1.a.3	Lapel air samplers are being utilized.

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38	Letter from W.F. Russell (NRC) to P.L. McGill (C-E) dated 1-25-88 Re: NRC Inspection Report 70-1100/87-05 10-5-87 through 10-9-87 and 10-19-87 through 10-23-87 Violation C The NRC Inspection Report states that C-E failed to make suitable measurements of the concentrations of radioactive materials in the air; samples were not representative of the air breathed by employees.	Letter from P.L. McGill (C-E) to James Lieberman (NRC) dated 2-23-88. C-E committed to improved air sampling program. A continuous air monitor with audible alarm has been purchased, and will be installed.	9/30/88	IV.C.1	Equipment is installed and calibrated and presently under operational test. Full operation by 11/30/88.

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39	Letter from W.L. Russell (NRC) to P.L. McGill (C-E) dated 1-25-88 Re: NRC Inspection Report 70-1100/87-05 10-5-87 through 10-9-87 and 10-19-87 through 10-23-87 Violation D The NRC Inspection Report states that C-E failed to make appropriate measurements of radioactivity in the body, excreted from the body, or combination of such measurements necessary for timely detection and assessment of individual intakes of radioactivity when air sample measurements indicated that a potential existed for intake of radioactive materials by workers.	Letter from P.L. McGill (C-E) to James Lieberman (NRC) dated 2-23-88. 1. C-E brought in a Helgeson mobile lung counting unit for normally scheduled visit during Dec. 1987. The number of individuals counted was increased to improve the data base. 2. Fecal analysis and urinalysis was performed on the 25% of personnel with the highest exposure.	COMPLETED	IV.C.1	

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40	Letter from W.T. Russell (NRC) to P.L. McGill (C-E) dated 1-25-88 Re: NRC Inspection Report 70-1100/87-05 10-5-87 through 10-9-87 and 10-19-87 through 10-23-87 Violation B The NRC Inspection Report states that C-E failed to make appropriate measurements of radioactivity in the body, excreted from the body, or combination of such measurements necessary for timely detection and assessment of individual intakes of radioactivity when air sample measurements indicated that a potential existed for intake of radioactive materials by workers.	Letter from P.L. McGill (C-E) to James Lieberman (NRC) dated 2-23-88. C-E is upgrading the bioassay program to 1. Include lung counting twice a year for all personnel who routinely work in the pellet shop. 2. fecal analysis and urinalysis twice a year for the 25% of personnel with the highest exposure.	12/31/88	IV.C.1	C-E is presently preparing a improved bioassay program. This program includes a requirement for continuous review by health physics personnel and annual review by management.

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NUMBER	NRC FINDING (I.E., VIOLATION, OBSERVATION, ALLEGATION, RECOMMENDATION)	C-E COMMITMENT	COMMITMENT DATE	PART ONE CROSS REFERENCE	COMMENTS
41	Letter from W.L. Russell (NRC) to P.L. McGill (C-E) dated 1-25-88. Re: NRC Inspection Report 70-1100/87-05 10-5-87 through 10-9-87 and 10-19-87 through 10-23-87 Violation D The NRC Inspection Report states that C-E failed to make appropriate measurements of radioactivity in the body, excreted from the body, or combination of such measurements necessary for timely detection and assessment of individual intakes of radioactivity when air sample measurements indicated that a potential existed for intake of radioactive materials by workers.	Letter from P.L. McGill (C-E) to James Lieberman (NRC) dated 2-23-88. C-E is upgrading the bioassay program to include fecal analysis and urinalysis twice a year for the 25% of personnel with the highest exposure.	12/31/88	IV.C.1	C-E is presently preparing an improved bioassay program. This program includes a requirement for continuous review by health physics personnel and an annual review by management.

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NUMBER	NRC FINDING (I.E., VIOLATION, OBSERVATION, ALLEGATION, RECOMMENDATION)	C-E COMMITMENT	COMMITMENT DATE	PART ONE CROSS REFERENCE	COMMENTS
42	Letter from W.T. Russell (NRC) to P.L. McGill (C-E) dated 1-25-88 Re: NRC Inspection Report 70-1100/87-05 10-5-87 through 10-9-87 and 10-19-87 through 10-23-87 Violation 6 The NRC Inspection Report states that C-E failed to make appropriate measurements of radioactivity in the body, excreted from the body, or combination of such measurements necessary for timely detection and assessment of individual intakes of radioactivity when air sample measurements indicated that a potential existed for intake of radioactive materials by workers.	Letter from P.L. McGill (C-E) to James Lieberman (NRC) dated 2-23-88. C-E is upgrading the bioassay program to include fecal and urinalysis to be conducted immediately for any personnel who are suspected to have received an intake above the allowable quarterly limit. Lung counting to be conducted within 4 weeks of suspected intake.	12/31/88	IV.C.1	The new bioassay program provides in depth action limits for air sampling, in-vivo counting, urinalysis, and fecal analysis such that the program quality will meet or exceed the 2-23-88 commitment.

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NUMBER	NRC FINDING (I.E., VIOLATION, OBSERVATION, ALLEGATION, RECOMMENDATION)	C-E COMMITMENT	COMMITMENT DATE	PART ONE CROSS REFERENCE	COMMENTS
45	Letter from W.F. Russell (NRC) to P.L. McGill (C-E) dated 1-25-88. Re: NRC Inspection Report 70-1100/87-05 10-5-87 through 10-9-87 and 10-19-87 through 10-23-87 Violation I The NRC Inspection Report states that C-E used respiratory protective equipment to limit the inhalation of airborne radioactive material, but failed elements of 10 CFR 20.103 which require: 1. Adequate bioassay program and surveys to evaluate individual exposure and assess protection. 2. Written procedures for training personnel in proper use of respiratory protective equipment. 3. Written procedures for properly fitting respiratory protective devices to individuals. 4. Issuance of a written policy statement on respirator use.	Letter from P.L. McGill (C-E) to James Lieberman (NRC) dated 2-23-88. C-E took action to review and revise respiratory protection program. 1. Management policy statement on respirator usage was issued. 2. Replacement NIOSH/MSHA approved filters respirators were purchased. 3. A qualified respiratory program administrator was appointed. 4. Written procedures which address all areas suggested by Reg. Guide 8.15 were implemented. 5. A respirator fit chamber was purchased and installed. 6. All personnel who are designated to use respirators were fit tested and trained. 7. Training of HP techs in daily administration of the respiratory protection program was completed.	COMPLETED	IV.B.4 IV.C.1 IV.H IV.H.5	

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NUMBER	NK FINDING (I.E., VIOLATION, OBSERVATION, ALLEGATION, RECOMMENDATION)	C-E COMMITMENT	COMMITMENT DATE	PART ONE CROSS REFERENCE	COMMENTS
44	Letter from W.T. Russell (NRC) to P.L. McGill (C-E) dated 1-25-88 Re: NRC Inspection Report 70-1100/87-05 10-5-87 through 10-9-87 and 10-19-87 through 10-25-87 Violation E The NRC Inspection Report states that C-E used respiratory protective equipment to limit the inhalation of airborne radioactive material, but failed elements of 10 CFR 20.103 which require: 1. Adequate bioassay program and surveys to evaluate individual exposure and assess protection. 2. Written procedures for training personnel in proper use of respiratory protective equipment. 3. Written procedures for properly fitting respiratory protective devices to individuals 4. Issuance of a written policy statement on respirator use.	Letter from P.L. McGill (C-E) to James Lieberman (NRC) dated 2-23-88. C-E is implementing an audit program to evaluate all phases of the respiratory protection program	12/31/88	V.A.4	

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NUMBER	NRC FINDING (I.E., VIOLATION, OBSERVATION, ALLEGATION, RECOMMENDATION)	C-E COMMITMENT	COMMITMENT DATE	PART ONE CROSS REFERENCE	COMMENTS
45	letter from W.J. Russell (NRC) to P.I. McGill (C-E) dated 1-25-88 Re: NRC Inspection Report 70-1100/N7-05 10-5-87 through 10-9-87 and 10-19-87 Violation 1 The NRC Inspection Report states that C-E did not perform necessary surveys of radiation hazards. 1. Incident on 9-26-87: A survey at Pellet Press Number 1 enrichment hood was not performed to assure that worker cleaning up highly contaminated equipment was provided with appropriate protective equipment. 2. Evaluation of the radiological hazard to workers drinking from contaminated fountains was not made until after the fountains were decontaminated. 3. Frisker contamination on individuals leaving the Pellet Shop was malfunctioning.	letter from P.I. McGill (C-E) to James Lieberman (NRC) dated 2-23-83. 1. C-E now surveys 84 areas and documents these on a daily basis. The surveys are used in conjunction w/ RUP program to advise workers as to the extent of contamination and radiation. 2. Drinking fountains have been removed.	COMPLETED	IV.C.1.a.5	Friskers are now being operationally tested on a daily basis.

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NUMBER	NRC FINDING (I.E., VIOLATION, OBSERVATION, ALLEGATION, RECOMMENDATION)	C-E COMMITMENT	COMMITMENT DATE	PART ONE CROSS REFERENCE	COMMENTS
46	Letter from W.L. Russell (NRC) to P.L. McGill (C-E) dated 1-25-88. Re: NRC Inspection Report 70-1100/87 05 10-5-87 through 10-9-87 and 10-19-87 through 10-23-87 Violation I The NRC Inspection Report states that C-E did not perform necessary surveys of radiation hazards. 1. Incident on 9-26-87: A survey at Pellet Press Number 1 enrichment hood was not performed to assure that worker cleaning up highly contaminated equipment was provided with appropriate protective equipment. 2. Evaluation of the radiological hazard to workers drinking from contaminated fountains was not made until after the fountains were decontaminated. 3. Frisker used to detect the presence of contamination on individuals leaving the Pellet Shop was malfunctioning.	Letter from P.L. McGill (C-E) to James Lieberman (NRC) dated 2-23-88. C-E initiated a program for upgrading existing survey procedures. The commitment was made to complete work by 12-31-88.	COMPLETED	IV.B.4 IV.C.1.b	Work was completed before the completion date to which C-E had originally committed.

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NUMBER	NRC FINDING (I.E., VIOLATION, OBSERVATION, ALLEGATION, RECOMMENDATION)	C-E COMMITMENT	COMMITMENT DATE	PART ONE CROSS REFERENCE	COMMENTS
47	Letter from W.T. Russell (NRC) to P.L. McGill (C-E) dated 1-25-88 Re: NRC Inspection Report 70-1100/87-05 10-5-87 through 10-9-87 and 10-19-87 through 10-23-87 Apparent Violation 70-1100/87-05-04 The Nuclear Licensing and Safety Manual was not approved by the Manager of NLS&S or submitted to the Central Document Control System.	While the Nuclear Licensing and Safety Manual has been signed, a new set of radiological Protection Instructions is being prepared which will supercede the existing document.	12/31/88	IV.C	
60	Letter from W.T. Russell (NRC) to P.L. McGill (C-E) dated 1-25-88 Re: NRC Inspection Report 70-1100/87-05 10-5-87 through 10-9-87 and 10-19-87 through 10-23-87 Violation G The NRC Inspection Report states that C-E did not provide certain procedures necessary to implement the radiation protection program. 1. radiation work permits 2. respiratory protection 3. bioassay 4. liquid waste sampling	Letter from P.L. McGill (C-E) to James Lieberman (NRC) dated 2-23-88. C-E has insituted procedures for sampling liquid waste and respiratory protection.	COMPLETED	IV.C.1.b	While the procedures for sampling liquid waste and respiratory protection have been issued as stated in the C-E letter dated 2/23/88, these procedures will be superceded by the improved Radiological Protection Instructions.

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NUMBER	NRC FINDING (I.E., VIOLATION, OBSERVATION, ALLEGATION, RECOMMENDATION)	C-E COMMITMENT	COMMITMENT DATE	PART ONE CROSS REFERENCE	COMMENTS
49	Letter from W.T. Russell (NRC) to P.I. McGill (C-E) dated 1-25-88 Re: NRC Inspection Report 70-1100/87-05 10-5-87 through 10-9-87 and 10-19-87 through 10-23-87 Violation G The NRC Inspection Report states that C-E did not provide certain procedures necessary to implement the radiation protection program. 1. radiation work permits 2. respiratory protection 3. bioassay 4. liquid waste sampling	Letter from P.I. McGill (C-E) to James Lieberman (NRC) dated 2-23-88. The Radiation Work Permit Procedure is undergoing upgrade.	11/30/88	IV.C.1.b	The radiation work permits are presently and effectively being used under the surveillance of the HP and Safety Supervisor. The RPI for radiation work permits has been prepared and should be implemented by 11/30/88.

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NUMBER	NRC FINDING (I.E., VIOLATION, OBSERVATION, ALLEGATION, RECOMMENDATION)	C-E COMMITMENT	COMMITMENT DATE	PART ONE CROSS REFERENCE	COMMENTS
50	Letter from W.L. Russell (NRC) to P.L. McGill (C-E) dated 1-25-88. Re: NRC Inspection Report 70-1100,87-05 10-5-87 through 10-9-87 and 10-19-87 through 10-23-87 Violation 6 The NRC Inspection Report states that C-E did not provide certain procedures necessary to implement the radiation protection program. 1. radiation work permits 2. respiratory protection 3. bioassay 4. liquid waste sampling	Letter from P.L. McGill (C-E) to James Lieberman (NRC) dated 2-23-88. The Bioassay Procedure is undergoing upgrade.	12/31/88	IV.C.1.b	The improved Bioassay Program has been implemented under the personal supervision of the Manager of Radiological and Industrial Safety.

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NUMBER	NRI FINDING (I.E., VIOLATION, OBSERVATION, ALLEGATION, RECOMMENDATION)	C-E COMMITMENT	COMMITMENT DATE	PART ONE CROSS REFERENCE	COMMENTS
51	Letter from W.T. Russell (NRC) to P.L. McGill (C-E) dated 1-25-88 Re: NRC Inspection Report 70-1100/87-05 10-5-87 through 10-9-87 and 10-19-87 through 10-23-87 Violation B The NRC Inspection Report states that C-E did not advise individuals working in restricted areas of the procedures and precautions necessary to minimize their exposure to radiation	Letter from P.L. McGill (C-E) to James Lieberman (NRC) dated 2-23-88. 1. Interim training sessions were held to inform pellet shop workers about sources of contamination, contamination control, and use of the contamination control board. 2. New written instructions for contamination control have been developed and shop personnel trained in these instructions.	COMPLETED	IV.C.1.b IV.H.5.a IV.H.5.b	While interim instructions for contamination control are in place, the new Radiological Protection Instruction on monitoring for radiation and contamination has been prepared for implementation by 12/31/88.

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NUMBER	NRC FINDING (I.E., VIOLATION, OBSERVATION, ALLEGATION, RECOMMENDATION)	C-E COMMITMENT	COMMITMENT DATE	PART ONE CROSS REFERENCE	COMMENTS
52	Letter from W.L. Russell (NRC) to P.L. McGill (C-E) dated 1-25-88. Re: NRC Inspection Report 70-1100/87-05 10-5-87 through 10-9-87 and 10-19-87 through 10-25-87 Violation 8 the NRC Inspection Report states that C-E did not advise individuals working in restricted areas of the procedures and precautions necessary to minimize their exposure to radiation.	Letter from P.L. McGill (C-E) to James Lieberman (NRC) dated 2-23-88. 1. Upgraded written procedures for the preparation, implementation, and close out of radiation work permits are being developed 2. Personnel will be trained in the use of these procedures.	12/31/88	IV.C.1.b IV.H.5.a	All pellet shop operators have received training to the interim training program and are scheduled for refresher training as required in the Radiological Protection Instruction training manual.

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NUMBER	NRC FINDING (I.E., VIOLATION, OBSERVATION, ALLEGATION, RECOMMENDATION)	C-E COMMITMENT	COMMITMENT DATE	PART ONE CROSS REFERENCE	COMMENTS
53	Letter from W.E. Russell (NRC) to P.L. McGill (C-E) dated 3-25-88 Re: NRC Inspection Report 70-1100/87-05 10-5-87 through 10-9-87 and 10-19-87 through 10-23-87 Violation 1 The NRC Inspection Report stated that C-E did not post notices of violations involving radiological working conditions, and responses to notices as required by 10 CFR 19.11.	Letter from P.L. McGill (C-E) to James Lieberman (NRC) dated 2-23-88. 1. Notices have been posted. 2. Personnel responsible for posting these notices have been made aware of the proper interpretation of 10 CFR 19.11.	COMPLETED	IV.H.3	Postings to keep workers informed are also a part of the culture program.

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NUMBER	NRC FINDING (I.E., VIOLATION, OBSERVATION, ALLEGATION, RECOMMENDATION)	C-E COMMENT	COMMITMENT DATE	PART ONE CROSS REFERENCE	COMMENTS
54	Letter from W.T. Russell (NRC) to P.L. McGill (C-E) dated 1-25-88. Re: NRC Inspection Report 70-1100/87-05 10-5-87 through 10-9-87 and 10-19-87 through 10-23-87 Violation J The NRC Inspection Report states that C-E did not maintain records of surveys for a damaged incoming fuel assembly on 4-6-87 and of surveys to support the RMP which controlled work on the assembly the following day.	Letter from P.L. McGill (C-E) to James Lieberman (NRC) dated 2-23-88. 1. Interim training on completion and filing of survey paperwork has been provided 2. For the time being, the Sr supervisor will review survey records for completeness.	COMPLETED	IV.C.1.b	A permanent procedure covering survey records will be implemented when the Radiological Protection Instruction for monitoring radiation and contamination is issued. This is scheduled for completion by 12/31/88.

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NUMBER	NRC FINDING (I.E., VIOLATION, OBSERVATION, ALLEGATION, RECOMMENDATION)	C-E COMMITMENT	COMMITMENT DATE	PART ONE CROSS REFERENCE	COMMENTS
55	Letter from W.T. Russell (NRC) to P.L. McGill (C-E) dated 1-25-88 Re: NRC Inspection Report 70-1106/87-05 10-5-87 through 10-9-87 and 10-19-87 through 10-23-87 Violation J The NRC Inspection Report states that C-E did not maintain records of surveys for a damaged incoming fuel assembly on 4-6-87 and of surveys to support the RWP which controlled work on the assembly the following day.	Letter from P.L. McGill (C-E) to James Lieberman (NRC) dated 2-23-88. A revised HP training program is being developed. It will include requirements for retention of survey results.	12/11/88	IV.C.1.b IV.H.5.b	

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ROW NUMBER	NRC FINDING (I.E., VIOLATION, OBSERVATION, ALLEGATION, RECOMMENDATION)	C-E COMMITMENT	COMMITMENT DATE	PART ONE CROSS REFERENCE	COMMENTS
56	NRC Inspection Report 70-1100/B7-05, Section 3 10-5-87 through 10-9-87 and 10-19-87 through 10-23-87 Observation of Inspector	License Enforcement Conference at Region 1 office on December 1, 1987, Significant License Meeting No. 87-1388. C-E will initiate a preventive maintenance program.	COMPLETED	IV.B.6	A maintenance program is in place.
57	NRC Inspection Report 70-1100/B7-05, Section 7 10-5-87 through 10-9-87 and 10-19-87 through 10-23-87 Allegations	See comment	ONGOING	IV.C.3	The allegation has been investigated by the NRC. C-E is pursuing an aggressive industrial safety program.
	The NRC Inspection Report states that the two individuals alleged that there are health and safety concerns on the non-radiologically controlled side of the facility.				

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NUMBER	MRC FINDING (I.E., VIOLATION, OBSERVATION, ALLEGATION, RECOMMENDATION)	C-E COMMITMENT	COMMITMENT DATE	PART ONE CROSS REFERENCE	COMMENTS
58	MRC Inspection Report 70-1100/B7-05, Section 4.B 10-5-87 through 10-9-87 and 10-19-87 through 10-23-87 Allegations	See comment	ONGOING	IV.C.3	The allegation has been investigated by the MRC. C-E is pursuing an aggressive industrial safety program
59	MRC Inspection Report 70-1100/B7-05, Section 6.0 10-5-87 through 10-9-87 and 10-19-87 through 10-23-87 Observation of Inspector	C-E will review the position description and modify as necessary.	6/30/89	IV.B.1	
	The MRC Inspection Report states that the two individuals alleged that the use of hexylene glycol is causing worker health problems on the non-radiologically controlled side of the facility.				
	The MRC Inspection Report states that the position description of the Supervisor, Health and Safety did not describe all of the duties of this position, as required by the license.				

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NUMBER	NRC FINDING (I.E., VIOLATION, OBSERVATION, ALLEGATION, RECOMMENDATION)	C-E COMMITMENT	COMMITMENT DATE	PART ONE CROSS REFERENCE	COMMENTS
60	NRC Inspection Report 70-1100/87-05, Section 9.0 10-5-87 through 10-9-87 and 10-19-87 through 10-23-87 Observation of Inspector The NRC Inspection Report states that there were no implementing procedures for transportation activities associated with the movement of radioactive materials offsite.	The transportation of radioactive materials off-site is included in the Radiological Protection Instruction program, which is currently being finalized.	11/30/88	IV.C.1.b	
61	NRC Inspection Report 70-1100/87-05, Sections 6.0 10-5-87 through 10-9-87 and 10-19-87 through 10-23-87 Inspector Observation The NRC inspection report states that HP staffing is weak. There is no professional Health Physicist.	The Manager of Radiological and Industrial Safety is a professional Health Physicist. C-E is increasing HP staff.	ONGOING	IV.H.2	

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NUMBER	NRC FINDING (I.E., VIOLATION, OBSERVATION, ALLEGATION, RECOMMENDATION)	C-E COMMITMENT	COMMITMENT DATE	PART ONE CROSS REFERENCE	COMMENTS
62	NRC Inspection Report 70-1100/87-05, Sections 6.0 10-5-87 through 10-9-87 and 10-19-87 through 10-23-87 Inspector Observation The NRC inspection report states that there was no company, corporate, or plant policy statement on ALARA found at the facility.	See comment	COMPLETED	III	The Vice President, Nuclear Fuel Manufacturing issued a Radiological Protection Standard which includes policy on ALARA implementation.
63	NRC Inspection Report 70-1100/87-05, Sections 5.1 and 10.4 10-5-87 through 10-9-87 and 10-19-87 through 10-23-87 Inspector Observation The NRC inspection report states that there were still no radiation protection procedures.	Radiation Safety Associates reviewed, wrote, and upgraded radiation protection instructions. See also comment.	12/31/88	IV.C.1.b	Further upgrades of these procedures have been taken over by our in-house organization. Completion is expected by 12/31/88.

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NUMBER	NRC FINDING (I.E., VIOLATION, OBSERVATION, ALLEGATION, RECOMMENDATION)	C-E COMMITMENT	COMMITMENT DATE	PART ONE CROSS REFERENCE	COMMENTS
64	NRC Inspection Report 70-1100/87-06, Sections 3.0 11-16-87 through 11-18-87 Allegation The NRC inspection report states that it was alleged that a HP Tech was not recording his radiation exposure for the third shift. Although the allegation was not substantiated, the inspector said that there was a lack of supervisory oversight of documentation and record keeping.	NRC Inspection Report 70-1100/87-06. Record keeping and documentation will be included in the radiation protection procedure upgrade.	12/31/88	IV.C.1.b	
65	NRC Inspection Report 70-1100/88-02, Section 3.1 1-25-88 through 1-29-88 NRC Inspector Observation The inspector observed that C-E had instituted an aggressive program for reducing shop contamination levels.	NRC Inspection Report 70-1100/88-02 C-E will also install new containment hoods w/ glove box fronts to confine loose UO2 powder in the preparation buckets.	11/30/88	IV.C.1.a	

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NUMBER	NRC FINDING (I.E., VIOLATION, OBSERVATION, ALLEGATION, RECOMMENDATION)	C-E COMMITMENT	COMMITMENT DATE	PART ONE CROSS REFERENCE	COMMENTS
66	NRC Inspection Report 70-1100/88-02, Section 3.2 1-25-88 through 1-29-88 NRC Inspector Observation The inspector observed general weakness in the respiratory protection program.	NRC Inspection Report 70-1100/88-02 The typos will be corrected, and the appropriate references will be added to the procedures.	12/31/88	IV.C.1.b	The respiratory protection program is part of the Radiological Protection Instructions. Any remaining deficiencies will be resolved during procedure implementation.
67	NRC Inspection Report 70-1100/88-02, Section 3.2 1-25-88 through 1-29-88 NRC Inspector Observation The inspector observed general that the title "Respiratory Administrator is not assigned. The acting Radiation Specialist administers the program, but his position description does not include this responsibility.	See comment	11/30/88	IV.H.1	The position of Respiratory Program Administrator is an integral part of the Respiratory Program Radiological Protection Instructions, which are now being finalized.

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NUMBER	NRC FINDING (I.E., VIOLATION, OBSERVATION, ALLEGATION, RECOMMENDATION)	C-E COMMITMENT	COMMITMENT DATE	PART ONE CROSS REFERENCE	COMMENTS
68	NRC Inspection Report 70-1100/88-02, Section 4.2 1-25-88 through 1-29-88 Item for Future NRC Review The inspector was informed that an audit of the Radiological Control Program revealed significant deficiencies.	NRC Inspection Report 70-1100/88-02 Program deficiencies in the Radiological Control Program will be addressed and corrected.	12/31/88	IV.C.1	Once the Radiological Protection Instructions program is implemented, it is believed that the program deficiencies will be resolved.
69	NRC Inspection Report 70-1100/88-02, Section 4.3 1-25-88 through 1-29-88 The HP tech training program has no lesson plans to detail each topic and what information is used.	NRC Inspection Report 70-1100/88-02 Radiation Safety Associates has prepared a training course.	COMPLETED	IV.H.5.b	As the Radiological Protection Instruction are implemented, the HP technicians will be instructed in their use. In addition, HP technicians training is considered to be an ongoing program. It is C-E's intent to evaluate personnel training needs on an individual basis annually.

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NUMBER	NRC FINDING (I.E., VIOLATION, OBSERVATION, ALLEGATION, RECOMMENDATION)	C-E COMMITMENT	COMMITMENT DATE	PART ONE CROSS REFERENCE	COMMENTS
70	NRC Inspection Report 70-1100/88-02, Section 4.5 1-25-88 through 1-29-88 NRC Inspector Observation The new B2s indicate higher air concentrations than the fixed air samplers. Data is insufficient and poorly documented.	NRC Inspection Report 70-1100/88-02 C-E will take more measurements to establish a good baseline.	10/30/89	IV.C.1.a	A program is in place to collect data over the next year in order to establish a baseline comparison between fixed air samplers and lapel air samplers.
71	NRC Inspection Report 70-1100/88-02, Section 4.5 1-25-88 through 1-29-88 NRC Inspector Observation The NRC inspector reviewed the bioassay program.	NRC Inspection Report 70-1100/88-02 C-E's hired consultant is to evaluate bioassay data. See comment.	10/30/88	IV.C.1	Some of the outside consultant report have been reviewed by the Manager of Radiological and Industrial Safety and were addressed as appropriate during the preparation of the Radiological Protection Instructions.

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NUMBER	NRC FINDING (I.E., VIOLATION, OBSERVATION, ALLEGATION, RECOMMENDATION)	C-E COMMITMENT	COMMITMENT DATE	PART ONE CROSS REFERENCE	COMMENTS
72	NRC Inspection Report 70-1100/88-02, Section 5 1-25-88 through 1-29-89. NRC Inspector Observation The NRC inspector reviewed the gaseous effluents.	NRC Inspection Report 70-1100/88-02 The entire FA 2 filter exhaust system will be checked for verification of isokinetic sampling.	10/30/88	IV.B.3 IV.C.1	This is covered by the equipment improvements and radiological protection programs.
73	NRC Inspection Report 70-1100/88-02, Section 6 1-25-88 through 1-29-88 Allegation It was alleged that there are fire and smoke problems w/ the No. 1 Dewaxing furnace.	NRC Inspection Report 70-1100/88-02 Periodic cleaning of zinc stearate from the dewaxing furnace to prevent it from accumulating and causing a fire problem will be addressed by a procedure.	03/30/89	IV.B.4	This item will be addressed as part of the preventive maintenance program.

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NUMBER	NRC FINDING (I.E., VIOLATION, OBSERVATION, ALLEGATION, RECOMMENDATION)	C-E COMMITMENT	COMMITMENT DATE	PART ONE CROSS REFERENCE	COMMENTS
74	NRC Inspection Report 70-1100/88-03, Section 3.a 2-29-88 through 3-4-88 and 3-28-88 through 3-31-88 Apparent Violation 70-1100/88-03-01 The NRC inspection report states that three drums containing uranium which were not marked to indicate the U-235 content and enrichment were observed on Waste Storage Pad outside Bldg 21.	Letter from P. L. McGill (C-E) to W. T. Russell, (NRC) dated 7-8-88 1. The drums in question have been labeled to indicate estimated uranium-235 content and enrichment. 2. A review was conducted of all secured mass limited containers to ensure that they are appropriately marked and labeled. 3. C-E has increased surveillance of materials in mass-limited containers to ensure that they are appropriately marked and labeled. 4. C-E has reviewed its operations procedures against the requirements of Section 4.1.6 of the license application. Changes will be made as necessary. 5. All secured mass-limited containers are appropriately labeled in compliance with the license application.	COMPLETED	IV.C.1.b	

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NUMBER	NRC FINDING (I.E., VIOLATION, OBSERVATION, ALLEGATION, RECOMMENDATION)	C-E COMMITMENT	COMMITMENT DATE	PART ONE CROSS REFERENCE	COMMENTS
75	NRC Inspection Report 70-1100/88-03, Section 5.b 11-16-87 through 11-18-87 Apparent Violation 70-1100/88-03-02 The NRC inspection report states that Operation Sheet No. 945, Rev. 39, dated 12-10-87 (this is a procedure) was not signed off by the Manager of Nuclear Licensing, Safety, Accountability, and Security. Other procedures as well were not signed off.	Letter from P. L. McGill (C-E) to W. T. Russell (NRC) dated 7-8-88 Operation Sheet 945, Revision 39 have been signed off by the Manager of NLS&S.	COMPLETED	IV.B.4	Instructions have been issued by the Vice President, Nuclear Manufacturing and the Plant Manager directing that all operation sheets are to be signed by the Manager, Radiological and Industrial Safety.

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NUMBER	NRC FINDING (I.E., VIOLATION, OBSERVATION, ALLEGATION, RECOMMENDATION)	C-E COMMITMENT	COMMITMENT DATE	PART ONE CROSS REFERENCE	COMMENTS
76	NRC Inspection Report 70-1100/88-03, Section 3.4 11-16-87 through 11-18-87 Apparent Violation 70-1100/88-03-02 The NRC inspection report states that a procedure, Operation Sheet No. 945, Revision 39, dated 12-10-88 did not contain the required safety precautions. - Nuclear criticality safety posting at the work station was not referenced - Workers were not cautioned to remove their fingers from inside the helium leak test tube Other procedures also did not contain precautions.	Letter from P. L. McGill (C-E) to W. T. Russell (NRC) dated 7-8-88 1. The new Plant Manager has been instructed to ensure that all changes to Operations Sheets are reviewed and approved and contain the appropriate safety precautions before being authorized. 2. All Operation Sheets have been rewritten and upgraded as appropriate to include the appropriate safety and criticality precautions. The upgraded Operation Sheets will be reviewed and approved by the appropriate personnel.	12/31/88	IV B.4	

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NUMBER	NRC FINDING (I.E., VIOLATION, OBSERVATION, ALLEGATION, RECOMMENDATION)	C-E COMMITMENT	COMPLETION DATE	PART ONE CROSS REFERENCE	COMMENTS
77	MRC Inspection Report 70-1100/BB-03, Section 3.4 2-29 BB through 3-4-88 and 3-28-88 through 3-31-88 Apparent Violation 70-1100/BB-03-03	Letter from P. L. McGill (C-E) to M. I. Russell (MRC), 7-B-88 Criticality limits on the pellet storage shelf were implemented by the following: - An additional engineered safeguard in the form of a strengthened steel bar was installed on the shelves. This reduces the potential for the four inch slab limit being violated. - Procedures corrected to require leveling in the trays. - Operators trained in the importance of meeting the slab limits.	COMPLETED	IV.B.4 IV.C.2	

The MRC inspection report states that
C-E failed to maintain a 4 inch slab
limit of pellets due in part to the
design of the pellet trays and storage
shelves.

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NUMBER	NRC FINDING (I.E., VIOLATION, OBSERVATION, ALLEGATION, RECOMMENDATION)	C-E COMMITMENT	COMMITMENT DATE	PART ONE CROSS REFERENCE	COMMENTS
2B	NRC Inspection Report 70-1100/88-03, Section 4.a.1 2-29-88 through 3-4-88 and 3-28-88 through 3-31-88 NRC Inspector Observation 70-1100/88-03-04 The NRC inspection report states that C-E has not established a management control system capable of tracking corrective actions taken from identification of item to completion of the required actions. Establishment of a management control system was identified as an inspector followup item.	NRC Inspection Report 70-1100/88-03 A commitment tracking data base has been implemented to assist management in tracking the progress of corrective actions.	COMPLETED	IV.F.2	

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NUMBER	NRC FINDING (I.E., VIOLATION, OBSERVATION, ALLEGATION, RECOMMENDATION)	C-E COMMITMENT	COMMITMENT DATE	PART ONE CROSS REFERENCE	COMMENTS
79	NRC Inspection Report 70-1100/88-03, Section 4.a.1 2-29-88 through 3-4-88 and 3-28-88 and 3-31-88 Apparent Violation 70-1100/88-03-05 The NRC inspection report states that C-E failed to conduct required daily audits on 2-15, 2-16, 2-20, 2-21, 2-27, and 2-28 of 1988.	See comment.	COMPLETED	IV.C.1 IV.C.2	C-E contested this violation. Daily audits for health physics and criticality compliance were and still are conducted as part of the normal health and safety program.
80	NRC Inspection Report 70-1100/88-03, Section 4.a.3 2-29-88 through 3-4-88 and 3-23-88 through 3-31-88 NRC Inspector Followup Item 70-1100/88-03-06 The NRC inspection report states that the Manager of NLSAES did not identify any violations during his monthly audits between Jan. 1987 and Jan. 1988.	See comment	COMPLETED	IV.C.1 IV.C.2	C-E has appointed a new Manager of Radiological and Industrial Safety who is responsible for the monthly radiological protection and criticality safety audits.

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C-E COMMENT	COMMITMENT DATE	PART ONE CROSS REFERENCE	COMMENTS
BRC FINDING (I.E., VIOLATION, OBSERVATION, ALLEGATION, RECOMMENDATION)			
B1 BRC Inspection Report 70-1100/BB-03, Section 4.b.2 2-29-BB through 3-4-BB and 3-28-BB through 3-31-BB BRC Inspector Followup Item 70-1100/BB-03-07	The procedures have been signed off.	IV.F	Instructions have been issued by the Vice President, Nuclear Fuel Manufacturing and the Plant Manager directing that all operation sheets are to be signed by the Manager, Radiological and Industrial Safety.
B2 BRC Inspection Report 70-1100/BB-03, Section 4.b.2 2-29-BB through 3-4-BB and 3-28-BB through 3-31-BB BRC Inspector Followup Item 70-1100/BB-03-07	A close out review sheet has been added to the evaluation package to document the final review action actions on each evaluation.	COMPLETED IV.F	

The BRC inspection report states that
two change requests, Request No. 261 and
Request No. 268 were not approved but
were implemented anyway.

The BRC inspection report states that
there was no formal review by the Health
and Safety Group to assure that all
established controls had been installed
as required.

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NUMBER	NRC FINDING (I.E., VIOLATION, OBSERVATION, ALLEGATION, RECOMMENDATION)	C-E COMMITMENT	COMMITMENT DATE	PART ONE CROSS REFERENCE	COMMENTS
85	NRC Inspection Report 70-1100/88-03, Section 4.B.2 2-29-88 through 3-4-88 and 3-28-88 through 3-31-88 Apparent Violation 70-1100/88-03-08 The NRC inspection report states that C-E did not conduct the required nuclear criticality safety evaluation prior to covering the conveyor between the batch makeup hood and the batch makeup cone hood (with a 2-3 inch gap between the batch makeup hood and the covered conveyor). The reviewer was concerned about the accumulation of powder under the conveyor.	Letter from P. L. McGill (C-E) to W. T. Russell (NRC), 7-8-88 The Manager of Radiological and Industrial Safety or the Nuclear Criticality Specialist will review all future proposed process, equipment, or facility changes and determine if a specific safety analysis is required. All credible nuclear criticality scenarios will be analyzed before being approved.	COMPLETED	IV.B.1 IV.C.2	A process requiring the Manager of Radiological and Industrial Safety and the Nuclear Criticality Specialist to review and approve facility changes has been implemented. The improved Radiological Protection Instructions will further enhance the process, thus ensuring that the proposed facility equipment and process changes are approved. The gap between the makeup hood and the batch makeup cone hood has been covered to reduce the potential for powder accumulation under the conveyor.

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NUMBER	NRC FINDING (I.E., VIOLATION, OBSERVATION, ALLEGATION, RECOMMENDATION)	C-E COMMITMENT	COMMITMENT DATE	PART ONE CROSS REFERENCE	COMMENTS
87	NRC Inspection Report 70-1100/88-03, Section 4.c 2-29-88 through 3-4-88 and 3-28-88 through 3-31-88 Apparent Violation 70-1100/88-03-09 The NRC inspection report states that the nuclear safety log sheets indicate the following: On 2-26-88, the hammermill was cleaned out and about 23.4 kilograms of uranium powder were removed. On 2-27-88 the same hammermill was cleaned out and an additional 1.1 kilograms of uranium powder were removed. The total, 24.5 kilograms exceeds the nuclear safety limit of 24.0 kilograms.	Letter from P. L. McGill (C-E) to W. T. Russell (NRC) An evaluation will be conducted to determine if other means exist to ensure that safety criticality limits are not exceeded. This will be completed by 3/31/89.	3/31/89	IV.B.4	

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NUMBER	NRC FINDING (I.E., VIOLATION, OBSERVATION, ALLEGATION, RECOMMENDATION)	C-E COMMITMENT	COMMITMENT DATE	PART ONE CROSS REFERENCE	COMMENTS
88	NRC Inspection Report 70-1100/88-03, Section 7.c 2-29-88 through 3-4-88 and 3-28-88 through 3-31-88 NRC Followup Item 70-1100/88-03-10 The NRC Inspector expressed concern about a 3-5-88 incident involving spilling of pellets which resulted in contamination of surfaces and one worker. The inspector was concerned because this was not reported to the Plant Manager or the Licensing Manager for 4 hours.	See comment	COMPLETED	IV.C.1.B	An Abnormal Occurrence Reporting System is in place. This system will be replaced by an Incident Report Procedure to be completed by 12/31/88.
89	NRC Inspection Report 70-1100/88-03, Section 9 2-29-88 through 3-4-88 and 3-28-88 through 3-31-88 Apparent Violation 70-1100/88-03-11 The NRC Inspection report states that uranium contained in sediment was not placed on inventory.	Letter from P. L. McGill (C-E) to W. T. Russell (NRC) 7-8-88 The material was added to the inventory. The Manager of Accountability and Security will ensure that all materials are inventoried, as necessary, without undue delays.	COMPLETED	IV.E	

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NUMBER	DESCRIPTION (I.E., VIOLATION, OBSERVATION, ALLEGATION, RECOMMENDATION)	C-E COMMENT	COMPLETION DATE	PART ONE CROSS REFERENCE	COMMENTS
89	MRC Inspection Report 70-1100/88-03, Section V 2-29-88 through 3-4-88 and 3-28-88 through 3-31-88 Apparent Violation 70-1100/88-03-1 The MRC Inspection report states that uranium contained in sediment was not placed on inventory.	Letter from P. L. McGill (C-E) to M. T. Russell (MRC) 7-8-88 The material was added to the inventory. The Manager of Accountability and Security will ensure that all materials are inventoried, as necessary, without undue delays.	COMPLETED	IV.E	
90	MRC Inspection Report 70-1100/88-03, Section 10 2-29-88 through 3-4-88 and 3-28-88 through 3-31-88 Allegation 70-1100/88-03-12 It was alleged that criticality safety training was not provided to HP Techn.	MRC Inspection Report 70-1100/88-03 An upgraded Criticality Safety Training Program will be incorporated into the Radiation theory section of the new General Employee Training.	COMPLETED	IV.H.5.a	

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NUMBER	NRC FINDING (I.E., VIOLATION, OBSERVATION, ALLEGATION, RECOMMENDATION)	C-E COMMITMENT	COMMITMENT DATE	PART ONE CROSS REFERENCE	COMMENTS
91	NRC Inspection Report 70-1100/88-55, Section 10 2-29-88 through 3-4-88 and 3-28-88 through 3-31-88 Allegation 70-1100/88-03-12 It was alleged that criticality safety training was not provided to HP techs.	Letter from P. L. McGill (C-E) to W. F. Russell (NRC) 7-8-88. Employees are required to take a test to ascertain the effectiveness of their training.	COMPLETED	IV.H.5.a	
92	NRC Inspection Report 70-1100/88-03, Section 3.c 2-29-88 through 3-4-88 and 3-28-88 through 3-31-88 NRC Inspector Observation The NRC inspection report states that the quality assurance group did not inspect new pellet trays upon receipt.	See comment	COMPLETED	V.A.2	Pellet trays were cut down to the correct size. Quality Control now reviews and approves all purchase orders related to radiological and criticality safety and performs source inspections as necessary.

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NUMBER	NRC FINDING (I.E., VIOLATION, OBSERVATION, ALLEGATION, RECOMMENDATION)	C-E COMMITMENT	COMMITMENT DATE	PART ONE CROSS REFERENCE	COMMENTS
93	NRC Inspection Report 70-1100/88-03, Section 3.e 2-29-88 through 3-4-88 and 3-28-88 through 3-31-88 NRC Inspector Observation The NRC inspection report states that flammable material storage cabinets are still filled to capacity. The storage of excess flammable liquids had not been reexamined as was committed to in the 70-1100/87-05 inspection.	See comment.	11/30/88	IV.C.3.a	Vendor is in process of emptying cabinets and removing these materials from the facility.
94	NRC Inspection Report 70-1100/88-03, Section 3.f 2-29-88 through 3-4-88 and 3-28-88 through 3-31-88 NRC Inspector Observation The NRC inspection report states that bags of used contaminated gloves, laundry, paper towels, and other combustibles were stored in cold shop.	The storage of combustible materials was re-examined.	ONGOING	IV.C.1.b	This specific item was corrected and elimination of such items is expected through the preparation and implementation of our Radiological Protection Instructions.

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NO.	REMARKS	C-E COMMENT	MRC INSPECTION REPORT 70-1100/BB-03	COMPLETION DATE	PART ONE CROSS REFERENCE	COMMENTS
95	MRC INSPECTION REPORT 70-1100/BB-03, SECTION 5.9 2-29-88 THROUGH 3-4-88 AND 3-28-88 MRC INSPECTOR OBSERVATION The MRC inspection report states that the n-siding system associated with the Building 5 Ceramics Lab could not be expected to reliably measure particulate releases because of the number of bends in the sampling line.		MRC Inspection Report 70-1100/BB-03 C-E has completed a study of the ventilation system in both Building 5 and Building 17. The ventilation systems associated with the ceramics, hot chemistry, and the emissions spectroscopy labs and all 4 ventilation systems in Building 17 have been evaluated. See comment.	COMPLETED	IV.B.2 IV.B.3	The Building 5 Ceramics laboratory ventilation system sample line has been rerouted. The rerun sample line is shorter, has less bends and fewer joints.
96	MRC INSPECTION REPORT 70-1100/BB-03, SECTION 5 2-29-88 THROUGH 3-4-88 AND 3-28-88 MRC OBSERVATION The MRC inspector observed that the preventive maintenance program is being implemented		A system has been established to assure that maintenance is conducted when it is required.	COMPLETED	IV.B.6	

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NO.	MRC FINDING (I.E., VIOLATION, OBSERVATION, ALLEGATION, RECOMMENDATION)	C-E COMMENT	MRC Inspection Report 70-1100/BB-03	COMPLETION DATE	PART ONE CROSS REFERENCE	COMMENTS
97	MRC Inspection Report 70-1100/BB-03, Section 5 2-29-BB through 3-4-BB and 3-28-BB through 3-31-BB MRC Observation The MRC Inspector observed that the preventive maintenance program is being implemented		MRC Inspection Report 70-1100/BB-03 Actions have been initiated to obtain operations and maintenance manuals for each piece of equipment	COMPLETED	IV-B-6	A preventive maintenance program is in place. Available maintenance manuals have been collected and placed into a library for reference.
98	MRC Inspection Report 70-1100/BB-03, Section 5 2-29-BB through 3-4-BB and 3-28-BB through 3-31-BB MRC Observation The MRC Inspector observed that the preventive maintenance program is being implemented		MRC Inspection Report 70-1100/BB-03 Actions have been initiated to assure that maintenance work has been completed in a satisfactory manner	COMPLETED	IV-B-6	

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NUMBER	NRC FINDING (I.E., VIOLATION, OBSERVATION, ALLEGATION, RECOMMENDATION)	C-E COMMENT	COMMITMENT DATE	PART ONE CROSS REFERENCE	COMMENT2
99	NRC Inspection Report 70-1100/BB-03, Section B 2-29-BB through 3-4-BB and 3-28-BB through 3-31-BB. The NRC Inspector expressed concern because RP Techn work 32 hours a day 7 days a week.	See comment	ONGOING	IV.B.2	The RP technician staff has been increased and work schedules are being monitored to ensure that technicians do not work extensive hours without justification.
100	NRC Inspection Report 70-1100/BB-03, Section 10 2-29-BB through 3-4-BB and 3-28-BB through 3-31-BB Allegation	C-E is aware of the problems has implemented improvements to the General Employee Training program.	ONGOING	IV.B.5.a	GET training is an ongoing effort.

It was alleged that some workers did not
understand the health and safety
implications of their exposure levels.

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NUMBER	NRC FINDING (I.E., VIOLATION, OBSERVATION, ALLEGATION, RECOMMENDATION)	C-E COMMITMENT	COMMITMENT DATE	PART ONE CROSS REFERENCE	COMMENTS
101	NRC Inspection Report 70-1100/88-03, Section 10 2-29-88 through 3-4-88 and 3-28-88 through 3-31-88 Allegation It was alleged that the Manager of NLSAES was not committed to safety.	NRC Inspection Report 70-1100/88-03 none	COMPLETED	III	C-E believes that the Manager of NLSAES was committed to safety. Never the less, the Manager of NLSAES has been reassigned duties dealing with security and accountability. A Manager of Radiological and Industrial Safety has been appointed to address radiological, criticality and industrial safety issues.
102	NRC Inspection Report 70-1100/88-03, Section 10 2-29-88 through 3-4-88 and 3-28-88 through 3-31-88 Allegation It was alleged that there is asbestos in the hydrogen analysis room.	See comment	ONGOING	IV.C.3	The asbestos was in the form of cable insulation, which has been replaced with non-asbestos insulation. C-E is committed to an aggressive industrial safety program, which includes the removal of asbestos.

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REPORT NO.	MHC 1100/186 (1.1., VOLUME 1, SECTION, ALLEGATION, AND ACTION)	C-E COMMITMENT	COMPLETION DATE	PART ONE CROSS REFERENCE	COMMENTS
103	MHC Inspection Report 70-1100/88-05, Section 2.b 5-25-88 to 5-27-88 Apparent Violation 70-1100/88-05-01	Meeting between C-E and the MHC at Region 1 on 8-3-88	COMPLETED	IV.C.1.b IV.B.5.a	The Supervisor in charge of the task was also re-instructed on the absolute necessity to follow the instructions of the RUPs and all other procedures.
	The inspection report states that the inspector observed workers handling potentially contaminated parts without protective gloves in violation of the RUP for this work and in violation of Section 3.1.1 of the license application.	1. Work was immediately stopped on the contract workers were directed to leave the pellet shop. 2. The contract workers were surveyed by a HP tech and had no detectable contamination on their bodies. 3. The contract workers were re-instructed on the absolute necessity to follow the instructions of the RUPs and all other procedures. 4. The president of the contracting company was telephoned and informed of the incident and the importance of properly instructing his people on the absolute necessity to follow our procedures. 5. HP techs were instructed to insure that all workers understand and comply with the requirements of a RUP prior to allowing the workers to start work. 6. The modified GEL was reviewed. More emphasis was placed on the use and compliance with RUPs.			

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NUMBER	NRC FINDING (I.E., VIOLATION, OBSERVATION, ALLEGATION, RECOMMENDATION)	C-E COMMITMENT	COMMITMENT DATE	PART ONE CROSS REFERENCE	COMMENTS
104	NRC Inspection Report 70-1100/88-05, Section 2.b 5-25-88 to 5-27-88 Apparent Violation 70-1100/88-05-02 The inspection report states that certain documents were not posted anywhere in Bldg. 5 and certain notices were not posted at the north and south entrances of Bldg. 5 as required 10CFR19.11(d).	Meeting between C-E and the NRC at Region 1 on 8-23-88 A review of Building 5 access points was conducted and 5 additional areas were identified for posting. These areas were posted pursuant to 10CFR19.11.	COMPLETED	IV.H.3	Posting to keep workers informed are also part of the culture program.
105	NRC Inspection Report 70-1100/88-05, Section 2.b 5-25-88 to 5-27-88 Apparent Violation 70-1100/88-05-02 The inspection report states that certain documents were not posted anywhere in Bldg. 5 and certain notices were not posted at the north and south entrances of Bldg. 5 as required 10CFR19.11(d).	Meeting between C-E and the NRC at Region 1 on 8-23-88 Individual has been appointed to be responsible for these postings in Bldg. 5.	COMPLETED	IV.H.3	Posting to keep workers informed are also part of the culture program.

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NUMBER	NRC FINDING (I.E., VIOLATION, OBSERVATION, ALLEGATION, RECOMMENDATION)	C-E COMMITMENT	COMMITMENT DATE	PART ONE CROSS REFERENCE	COMMENTS
106	NRC Inspection Report 70-1100/88-05, Section 2.b 5-25-88 to 5-27-88 Apparent Violation 70-1100/88-05-02 The inspection report states that certain documents were not posted anywhere in Bldg. 5 and certain notices were not posted at the north and south entrances of Bldg. 5 as required 10CFR19.11(d).	Meeting between C-E and the NRC at Region 1 on 8-23-88 Individual has been appointed to be responsible for postings in Bldgs. 17 & 21.	COMPLETED	IV.H.3	Posting to keep workers informed are also part of the culture program.

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NUMBER	NRC FINDING (I.E., VIOLATION, OBSERVATION, ALLEGATION, RECOMMENDATION)	C-E COMMITMENT	COMMITMENT DATE	PART ONE CROSS REFERENCE	COMMENTS
107	NRC Inspection Report 70-1100/88-05, Section 3.c.2 5-25-88 to 5-27-88 Apparent Violation 70-1100/88-05-03 The inspection report states that for the June 24, 1987 shipment, the absolute filters in B-25 Box No. 1103 contained 68 grams of U-235 and was labeled as Low Specific Activity (LSA). According to 10 CFR 71.53, if a B-25 Box contains more than 56.5 grams of U-235, it may not be labeled as LSA. For the November 2, 1987 shipment, B-25 Boxes 1107, 1109, and 1110, which were labeled LSA, each contained between 56.9 and 130.5 grams of U-235. Failure to properly label the boxes was identified as an apparent violation of 49 CFR 170.403.	Meeting between C-E and the NRC at Region 1 on 8-3-88 The procedure for LSA shipments has been changed and requires that all packages within a container not exceed 5 grams of U235 in a 10 liter volume along with all other requirements for LSA shipments.	COMPLETED	IV.C.1.b	

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NRC FCR	NRC FINDING (I.E., VIOLATION, OBSERVATION, ALLEGATION, RECOMMENDATION)	C-E COMMITMENT	COMMITMENT DATE	PART ONE CROSS REFERENCE	COMMENTS
108	NRC Inspection Report 70-1100/88-05, Section 3.c.2 5-25-88 to 5-27-88 Apparent Violation 70-1100/88-05-04 The inspection report states that for the June 24, 1987 shipment, the absolute filters in B-25 Box No. 1103 contained 68 grams of U-235 and was labeled as Low Specific Activity (LSA). According to 10 CFR 71.53, if a B-25 Box contains more than 56.5 grams of U-235, it may not be labeled as LSA. For the November 2, 1987 shipment, B-25 Boxes 1107, 1109, and 1110, which were labeled LSA, each contained between 56.9 and 130.5 grams of U-235. Failure to provide the appropriate information concerning the proper shipping name and hazard class on the waste manifests form was identified as an apparent violation of 10 CFR 20.311.	Meeting between C-E and the NRC at Region 1 on 8-3-88. The procedure for measuring the U-235 content of absolute filters has been changes to require the recleaning of the filters to get the U-235 content less than 56 grams and if this condition is not met the filter will be labeled with the proper radioactive material fissile class.	COMPLETED	IV.C.1.b	

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NUMBER	NRC FINDING (I.E., VIOLATION, OBSERVATION, ALLEGATION, RECOMMENDATION)	C-E COMMITMENT	COMMITMENT DATE	PART ONE CROSS REFERENCE	COMMENTS
109	NRC Inspection Report 70-1100/88-05, Section 3.c.2 5-25-88 to 5-27-88 Apparent Violation 70-1100/88-05-05 The inspection report states that the failure to measure uranium and U-235 on all waste discards was identified as an apparent violation of Section 4.2.1 of the FNMCP.	Meeting between C-E and the NRC at Region I on 8-3-88 C-E held up shipment of all containers that contain non-compacted waste.	12/31/88	IV.E	
110	NRC Inspection Report 70-1100/88-05, Section 3.c.2 5-25-88 to 5-27-88 Apparent Violation 70-1100/88-05-05 The inspection report states that the failure to measure uranium and U-235 on all waste discards was identified as an apparent violation of Section 4.2.1 of the FNMCP.	Meeting between C-E and the NRC at Region I on 8-3-88 Measurement methods for non-compacted waste have been developed and these measurement methods are being used to determine the amount of U-235 in the non-compacted waste prior to their being shipped offsite.	12/31/88	IV.E	

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NUMBER	NRC FINDING (P.E., VIOLATION, OBSERVATION, ALLEGATION, RECOMMENDATION)	C-E COMMITMENT	COMMITMENT DATE	PART ONE CROSS REFERENCE	COMMENTS
111	NRC Inspection Report 70-1100/88-05, Section 3.c.2 5-25-88 to 5-27-88 Apparent Violation 70-1100/88-05-05 The inspection report states that the failure to measure uranium and U-235 on all waste discards was identified as an apparent violation of Section 4.2.1 of the FNMCP.	Meeting between C-E and the NRC at Region 1 on 8-3-88. The FNMCP will be revised to include these measurement methods.	12/31/88	IV.E	

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NUMBER	NRC FINDING (I.E., VIOLATION, OBSERVATION, ALLEGATION, RECOMMENDATION)	C-E COMMITMENT	COMMITMENT DATE	PART ONE CROSS REFERENCE	COMMENTS
112	NRC Inspection Report 70-1100/88-05, Section 3.c.2 5-25-88 to 5-27-88 Apparent Violation 70-1100/88-05-06 The inspection report states that the standards used for the calibration of the Nondestructive Assay device for the determination of the U-235 content of absolute filters ranged from 0 to 90 grams of U-235. Data indicates that the U-235 content several filters was outside the calibration range. The FNMCP Annex states that should results indicate that the process material is outside to the calibration range, the results will not be used. These results were, however, used. This was identified as an apparent violation of the FNMCP Annex Paragraph 4.1.3.	Meeting between C-E and the NRC at Region 1 on 8-3-88 1. C-E has reinstructed all personnel rho assay filters on the requirements of the FNMCP. 2. C-E has changed the procedure for assay of filters contaminated with U-235 to no use measurements outside the range of the calibration standards used.	COMPLETED	IV.E	

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NUMBER	NRC FINDING (I.E., VIOLATION, OBSERVATION, ALLEGATION, RECOMMENDATION)	C-E COMMITMENT	COMMITMENT DATE	PART ONE CROSS REFERENCE	COMMENTS
113	NRC Inspection Report 70-1100/88-05, Section 3.c.2 5-25-88 to 5-27-88 Apparent Violation 70-1100/88-05-06 The inspection report states that the standards used for the calibration of the Nondestructive Assay device for the determination of the U-235 content of absolute filters ranged from 0 to 90 grams of U-235. Data indicates that the U-235 content several filters was outside the calibration range. The FNMCP Annex states that should results indicate that the process material is outside to the calibration range, the results will not be used. These results were, however, used. This was identified as an apparent violation of the FNMCP Annex Paragraph 4.1.3.	Meeting between C-E and the NRC at Region 1 on 8-3-88 C-E has changed the procedure for assay of filters contaminated with U-235 to not use measurements outside the range of the calibration standards used.	COMPLETED	IV.E	

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NUMBER	NRC FINDING (I.E., VIOLATION, OBSERVATION, ALLEGATION, RECOMMENDATION)	C-E COMMITMENT	COMMITMENT DATE	PART ONE CROSS REFERENCE	COMMENTS
114	NRC Inspection Report 70-1100/88-06, Section 5.4 6-14-88 to 6-17-88 Open Item 70-1100/88-06-01 The NRC inspection report states that the inspector reviewed the progress of the bioassay program.	The improved bioassay program has been implemented under the supervision of the Manager of Radiological and Industrial Safety. The program results are being evaluated as they become available.	COMPLETED	IV.C.1	

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NUMBER	NRC FINDING (I.E., VIOLATION, OBSERVATION, ALLEGATION, RECOMMENDATION)	C-E COMMITMENT	COMMITMENT DATE	PART ONE CROSS REFERENCE	COMMENTS
115	NRC Inspection Report 70-1100/88-06, Section 5.5 6-14-88 to 6-17-88 Apparent Violation 70-1100/88-06-02 The NRC inspection report states that the inspector observed a worker using a trash compactor without using a breathing zone air sampler. There were no air samplers or ventilation controls in the area. No surveys of the trash had been done prior to compacting. No RMPs were issued for the work. These are an apparent violation of 10 CFR 20.201, which requires that surveys be performed to assure compliance with the regulations, and evaluate the extent of radiation hazards which may be present.	NRC Inspection Report 70-1100/88-06 Meeting between C-E and the NRC at Region I on 8-23-88 The compacting operation has been established as an activity requiring a RMP.	COMPLETED	IV.C.1.a ;V.C.1.b	

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NUMBER	NRC FINDING (I.E., VIOLATION, OBSERVATION, ALLEGATION, RECOMMENDATION)	C-E COMMITMENT	COMMITMENT DATE	PART ONE CROSS REFERENCE	COMMENTS
116	NRC Inspection Report 70-1100/88-06, Section 5.5 6-14-88 to 6-17-88 Apparent Violation 70-1100/88-06-02 The NRC inspection report states that the inspector observed a worker using a trash compactor without using a breathing zone air sampler. There were no air samplers or ventilation controls in the area. No surveys of the trash had been done prior to compacting. No RMPs were issued for the work. These are an apparent violation of 10 CFR 20.201, which requires that surveys be performed to assure compliance with the regulations, and evaluate the extent of radiation hazards which may be present.	NRC Inspection Report 70-1100/88-06 Meeting between C-E and the KRC at Region 1 on 8-23-88 Breathing zone air samplers are provided for all sampling activities and are required by the RWP.	COMPLETED	IV.C.1.a IV.C.1.b	

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NUMBER	NRC FINDING (I.E., VIOLATION, OBSERVATION, ALLEGATION, RECOMMENDATION)	C-E COMMITMENT	COMMITMENT DATE	PART ONE CROSS REFERENCE	COMMENTS
117	NRC Inspection Report 70-1100/88-06, Section 5.5 6-14-88 to 6-17-88 Apparent Violation 70-1100/88-06-02 The NRC inspection report states that the inspector observed a worker using a trash compactor without using a breathing zone air sampler. There were no air samplers or ventilation controls in the area. No surveys of the trash had been done prior to compacting. No RWPs were issued for the work. These are an apparent violation of 10 CFR 20.201, which requires that surveys be performed to assure compliance with the regulations, and evaluate the extent of radiation hazards which may be present.	Meeting between C-E and the NRC at Region 1 on 8-23-88 The operation of this unit is being evaluated to determine if ventilation modifications will improve the operation with respect to ALARA considerations.	COMPLETED	IV.C.1.b	For approximately the last three months the trash compactor has been operated under a radiation work permit specifying the use of lapel air samplers. Contamination surveys and air sample results indicate that operation of the compactor is not a radiological hazard.

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NUMBER	NRC FINDING (I.E., VIOLATION, OBSERVATION, ALLEGATION, RECOMMENDATION)	C-E COMMITMENT	COMMITMENT DATE	PART ONE CROSS REFERENCE	COMMENTS
118	NRC Inspection Report 70-1100/88-06, Section 5.7 6-14-88 to 6-17-88 Apparent Violation 70-1100/88-06-05 The NRC inspection report states that failure to supply indium foil badges (criticality dosimeters) to all visit rs to the pellet shop is an apparent violation of SNM license 1067, Part II, Section 4.9.	Meeting between C-E and the NRC at Region 1 on 8-3-88. 1. The guard force has been instructed to not allow anyone into the facility without an indium foil on either their identification badge or their ILD. 2. Indium foil has been added to all ID badges.	COMPLETED	IV.D	This is covered by the security program.

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NUMBER	NRC FINDING (I.E., VIOLATION, OBSERVATION, ALLEGATION, RECOMMENDATION)	C-E COMMITMENT	COMMITMENT DATE	PART ONE CROSS REFERENCE	COMMENTS
119	NRC Inspection Report 70-1100/88-06, Section 5.7 6-14-88 to 6-17-88 Apparent Violation 70-1100/88-06-03 The NRC inspection report states that failure to supply indium foil badges (criticality dosimeters) to all visitors to the pellet shop is an apparent violation of SNM license 1067, Part II, Section 4.9.	Meeting between C-E and the NRC at Region 1 on 8-3-88 Indium foil has been added to all ID badges.	COMPLETED	IV.D	This is covered by the security program.

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NUMBER	NRC FINDING (I.E., VIOLATION, OBSERVATION, ALLEGATION, RECOMMENDATION)	C-E COMMITMENT	COMMITMENT DATE	PART ONE CROSS REFERENCE	COMMENTS
120	NRC Inspection Report 70-1100/88-06, Section 5.1 6-14-88 to 6-17-88 The NRC inspection report states that the buckets used for the preparation of powder prior to the pressing into pellets had not yet been replaced. This is necessary because of the failure of cones (funnels) to remain fastened to the buckets when being inverted and fed into the blenders.	C-E has modified the cones and buckets.	COMPLETED	IV.B	
121	NRC Inspection Report 70-1100/88-06, Section 5.1 6-14-88 to 6-17-88 The NRC inspection report states that there are at least three hoods (stations) where workers handled loose powder with the station front open to the worker's breathing zone.	Manager of Radiological and Industrial Safety is identifying all equipment that still needs improvements to reduce airborne radioactivity levels. Systems upgrades will be performed as necessary. See comment	12/31/84	IV.B IV.C.1.a	This item is currently being reviewed by manufacturing engineering.

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NUMBER	NRC FINDING (I.E., VIOLATION, OBSERVATION, ALLEGATION, RECOMMENDATION)	C-E COMMITMENT	COMMITMENT DATE	PART ONE CROSS REFERENCE	COMMENTS
122	NRC Inspection Report 70-1100/88-06, Section 5.5 6-14-88 to 6-17-88 The NRC inspection report states that the inspector observed that the effectiveness of the contamination control program was declining, as areas which were previously observed to have low contamination levels were approaching the license limit of 10,000 dpm per 100 sq. centimeters.	See comment	ONGOING	IV.C.1	C-E does not believe that the effectiveness of the contamination control program is declining. C-E remains dedicated to an aggressive contamination control program.
123	NRC Inspection Report 70-1100/88-06, Section 5.6 6-14-88 to 6-17-88 The NRC inspection report states that the inspector observed that the Radiation Work Permit procedure was weak.	The Manager of Radiological and Industrial Safety is establishing a Radiation Work Permit procedure to satisfy the needs of the site.	10/30/88	IV.C.1.b	The Radiological Protection Instruction program includes the Radiation Work Permit. The formalized procedure is in the approval process.

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NUMBER	NRC FINDING (I.E., VIOLATION, OBSERVATION, ALLEGATION, RECOMMENDATION)	C-E COMMITMENT	COMMITMENT DATE	PART ONE CROSS REFERENCE	COMMENTS
124	NRC Inspection Report 70-1100/88-06, Section 7.0 6-14-88 to 6-17-88 The NRC inspection report states that: 1. The equipment use to detect hot particles may be inappropriate 2. C-E was unaware of the the current NRC position regarding averaging the dose to 1 square centimeter of skin and the correction factor needed to conver meter response to hot particle to total dose equivalent.	See comment	11/30/88	NOT ADDRESSED	This item is applicable to activities conducted under the byproduct license. A hot particle control program has been implemented and has been effective to date. Special hot particle detection equipment has been ordered. C-E anticipates that it will be in use by about 11/30/88.

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NUMBER	NRC FINDING (I.E., VIOLATION, OBSERVATION, ALLEGATION, RECOMMENDATION)	C-E COMMITMENT	COMMITMENT DATE	PART ONE CROSS REFERENCE	COMMENTS
125	NRC Inspection Report 70-1100/88-06, Section 8.0 6-14-88 to 6-17-88 The NRC inspection report states that: 1. C-E had not established the criteria or threshold levels to determine the type of changes which need to be evaluated for criticality safety. 2. C-E had not established procedures to that each process and equipment change was properly reviewed, evaluated, fabricated, installed, and initially operated in accordance with the criteria established.	The Manager of Radiological and Industrial Safety has reviewed this area and is establishing the necessary controls. See comment.	11/30/88	IV.B.1 IV.C.2	The Criticality Safety procedure is part of the Radiological Protection Instruction program. This procedure will include review and approval of facility, process and operation changes which could affect criticality safety.

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NUMBER	NRC FINDING (I.E., VIOLATION, OBSERVATION, ALLEGATION, RECOMMENDATION)	C-E COMMITMENT	COMMITMENT DATE	PART ONE CROSS REFERENCE	COMMENTS
126	Inspection 70-1100/88-07 7-25-88 Section 3 Unresolved Item 70-1100/88-07-01 The NRC inspection report states that the Fuel Bundle Seal Log contained sheets that documented the tamper proof seals that were applied or removed during the period from 1-1-83 through 7-28-88. The seal log did not, however, contain the sheets for the period 10-8-86 through 12-31-87. More information is required to ascertain whether there is a violation of NRC requirements.	Revision of the Seal Log Procedure is in progress.	12/30/88	IV.E	Attempts are being made to reconstruct the missing seal log sheets.

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NUMBER	NRC FINDING (I.E., VIOLATION, OBSERVATION, ALLEGATION, RECOMMENDATION)	C-E COMMITMENT	COMMITMENT DATE	PART ONE CROSS REFERENCE	COMMENTS
127	Tour meeting with Stewart Ebner and Jerry Roth (NRC) on 8-15-88. Mr. Roth noted that a damaged 250-2 shipping container was in use.	C-E will inspect and, if necessary, repair the 250-2 shipping container prior to use.	COMPLETED	IV.C.1.b	
128	Tour meeting with Stewart Ebner and Jerry Roth (NRC) on 8-15-88. It was noted that a lapel air sampler was being worn incorrectly.	C-E corrected the improper wearing of the lapel air sampler and provided training to the user.	COMPLETED	IV.C.1.b IV.H.5.a	

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NUMBER	NRC FINDING (I.E., VIOLATION, OBSERVATION, ALLEGATION, RECOMMENDATION)	C-E COMMITMENT	COMMITMENT DATE	PART ONE CROSS REFERENCE	COMMENTS
129	Tour meeting with Stewart Ebnetter and Jerry Roth (NRC) on 8-15-88. Mr. Ebnetter asked if C-E had a formalized recovery program for the fuel facility in place. C-E's response was affirmative. Mr. Ebnetter asked to see the program.	C-E will provide the NRC a copy of the fuel facility recovery plan.	10/23/88	NFIIP	
130	Tour meeting with Stewart Ebnetter and Jerry Roth (NRC) on 8-15-88. Mr. Roth asked that C-E provide him copies of the lesson plans for the improved training program	C-E will provide the NRC copies of the training program lesson plans.	10/31/88	IV.H.5	Sampler will be sent by 10/31/88. The full set will be available 12/31/88.

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NUMBER	NRC FINDING (I.E., VIOLATION, OBSERVATION, ALLEGATION, RECOMMENDATION)	C-E COMMITMENT	COMMITMENT DATE	PART ONE CROSS REFERENCE	COMMENTS
151	Tour meeting with Stewart Ebner and Jerry Roth (NRC) on 8-15-88 Mr. Roth asked that C-E provide him a copy of the overall training program plan.	C-E will to provide the NRC a copy of the overall training program plan.	10/31/88	IV.B.5	
152	Tour meeting with Stewart Ebner and Jerry Roth (NRC) on 8-15-88 The NRC asked if C-E had a process for developing and reviewing procedures.	C-E will provide the NRC a copy of the procedure for developing procedures, which is now being developed.	10/30/88	IV.B.4 IV.C.1.b IV.C.3.a	

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NUMBER	NRC FINDING (I.E., VIOLATION, OBSERVATION, ALLEGATION, RECOMMENDATION)	C-E COMMITMENT	COMMITMENT DATE	PART ONE CROSS REFERENCE	COMMENTS
133	Four meeting with Stewart Ebner and Jerry Roth (NRC) on 8-15-88 The NRC reminded C-E that (1) security procedures need to be submitted to the NRC 2 to 3 months prior to implementation, and (2) security procedures are safeguarded documents.	C-E will submit safeguard procedures to the NRC 2 to 3 months prior to implementation.	12/30/88	IV.D	
134	Letter from M.T. Russell (NRC) to S.T. Brewer (C-E) dated 9-21-88 SALP Report for 7-1-86 through 6-30-88 The SALP Board recommended that C-E establish and maintain a performance improvement program.	See comment	ONGOING	IV.B.6	A maintenance program is in place. C-E is committed to an aggressive program.

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NUMBER	NRC FINDING (I.E., VIOLATION, OBSERVATION, ALLEGATION, RECOMMENDATION)	C-E COMMITMENT	COMMITMENT DATE	PART ONE CROSS REFERENCE	COMMENTS
135	Letter from W.T. Russell (NRC) to S.T. Brewer (C-E) dated 9-21-88 SALP Report for 7-1-86 through 6-30-88 The SALP Board recommended that C-E establish a formal change control system to assure that each process and equipment change is properly reviewed, evaluated, fabricated, installed and operated in accordance with the criteria established as a result of the criticality safety evaluations.	See comment	12/31/86	IV.B.1 IV.B.2 IV.B.3 IV.F.1	The Ecological Protection Instruction on Criticality Safety will include a formal procedure for overviewing, analyzing, implementing, and verifying proposed changes to facilities, equipment, or processes with respect to criticality safety.
136	Letter from W.T. Russell (NRC) to S.T. Brewer (C-E) dated 9-21-88 SALP Report for 7-1-86 through 6-30-88 The SALP Board recommended that C-E expand and maintain a technically qualified professional radiological protection staff.	See comment	ONGOING	IV.B.2	C-E is committed to maintaining a qualified radiological protection staff.

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NUMBER	NRC FINDING (I.E., VIOLATION, OBSERVATION, ALLEGATION, RECOMMENDATION)	C-E COMMITMENT	COMMITMENT DATE	PART ONE CROSS REFERENCE	COMMENTS
137	Letter from W.L. Russell (NRC) to S.L. Brewer (C-E) dated 9-21-88 SALP Report for 7-1-86 through 6-30-88 The SALP Board recommended that C-E place a high priority on the establishment and implementation of radiological protection procedures.	The radiological protection procedures are being prepared, reviewed, approved, and implemented on a priority basis.	12/31/88	IV.C.1.b	
138	Letter from W.L. Russell (NRC) to S.L. Brewer (C-E) dated 9-21-88 SALP Report for 7-1-86 through 6-30-88 The SALP Board recommended that C-E review and revise as necessary the facility radiological protection program.	See comment	12/31/88	IV.C.1	C-E is currently revising the radiological protection program.

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NUMBER	NRC FINDING (I.E., VIOLATION, OBSERVATION, ALLEGATION, RECOMMENDATION)	C-E COMMITMENT	COMMITMENT DATE	PART ONE CROSS REFERENCE	COMMENTS
139	Letter from W.T. Russell (NRC) to S.T. Brewer (C-E) dated 9-21-88. SALP Report for 7-1-86 through 6-30-88. The NRC report recommends that C-E promote an improved workplace culture between management and operators.	See comment	ONGOING	IV.A IV.H.3	C-E has instituted a culture change process.
140	Letter from W.T. Russell (NRC) to S.T. Brewer (C-E) dated 9-21-88. SALP Report for 7-1-86 through 6-30-88. The SALP Board recommended that C-E conduct a site wide demonstration of the emergency plan and include offsite support agencies.	See comment	6/30/89	IV.C.4 IV.H.5.a	Recommendations to be considered as part of Emergency Procedures review to be initiated by 12/31/88 and completed by 6/30/89.

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NUMBER	NRC FINDING (I.E., VIOLATION, OBSERVATION, ALLEGATION, RECOMMENDATION)	C-E COMMITMENT	COMMITMENT DATE	PART ONE CROSS REFERENCE	COMMENTS
141	Letter from W.L. Russell (NRC) to S.L. Brewer (C-E) dated 9-21-88 SALP Report for 7-1-86 through 6-30-88 The SALP Board recommended that C-E apply various of the facility QA program to the facility safety and compliance activities.	See comment	COMPLETED	IV.F.5 V.A V.B	Quality Control now reviews and approves all radiological and criticality safety related purchase orders and conducts source inspections as necessary.
142	Letter from W.L. Russell (NRC) to S.L. Brewer (C-E) dated 9-21-88 SALP Report for 7-1-86 through 5-30-88 The SALP Board recommended that C-E improve self-assessment capabilities and develop an internal inspection and audit program.	C-E will develop improved self-assessment capabilities and determine how to improve the internal inspection and audit program.	12/31/88	IV.F.5 V.A V.B	

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NUMBER	NRC FINDING (I.E., VIOLATION, OBSERVATION, ALLEGATION, RECOMMENDATION)	C-E COMMITMENT	COMMITMENT DATE	PART ONE CROSS REFERENCE	COMMENTS
143	Letter from J.F. Russell (NRC) to S.F. Brewer (C-E) dated 9-21-88 SALP Report for 7-1-86 through 6-30-88 The SALP Board recommended that C-E continue the use of a dedicated licensing staff		COMPLETED	IV.G	
144	Letter from W.F. Russell (NRC) to S.F. Brewer (C-E) dated 9-21-88 SALP Report for 7-1-86 through 6-30-88 The SALP Board recommended that C-E assure that the dedicated licensing staff is trained in the preparation of Part 70 license modification submittals.		03/30/89	IV.G	Ongoing activity

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NUMBER	NRC FINDING (I.E., VIOLATION, OBSERVATION, ALLEGATION, RECOMMENDATION)	C-E COMMITMENT	COMMITMENT DATE	PART ONE CROSS REFERENCE	COMMENTS
145	Letter from W.L. Russell (NRC) to S.L. Jensen (C-E) dated 9-21-88 SALP Report for 7-1-86 through 6-30-88 The SALP Board recommended that C-E provide adequate technical support to the licensing staff.		ONGOING	IV.R	Ongoing activity

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NUMBER	NRC FINDING (I.E., VIOLATION, OBSERVATION ALLEGATION, RECOMMENDATION)	C-E COMMITMENT	COMMITMENT DATE	PART ONE CROSS REFERENCE	COMMENTS
146	Letter from M.T. Russell (NRC) to S.T. Brewer (C-E) dated 10-7-88 The NRC letter states that C-E must reply to the notice of violations. 1. Failure to conduct radiological surveys. 2. Failure to provide indium foil C-E badges. 3. Failure to follow Radiation Work Permit instructions. 4. Failure to post documents in accordance with 10 CFR 19.11(a),(b) and (d). 5. Failure to properly fill out waste shipment manifests. 6. Delivery to a carrier for transport fissile material in amounts that did not meet exemption standards set forth in 10 CFR 71.55. 7. Failure to properly assess the U-235 content of waste materials. 8. Use of nondestructive Assay results outside of equipment calibration range.	Letter from M.T. Russell (NRC) to S.T. Brewer dated 10-7-88 Reply to include the following 1. Admission or denial of violation 2. The reason for admitted violation 3. Corrective action taken and results 4. Corrective actions to be taken to avoid further violations 5. Date of full compliance.	11/05/88	NOT ADDRESSED	This is outside the scope of this report. It is being handled separately.