
From: Rivera Ortiz, Joel
Sent: Thursday, September 17, 2020 1:38 PM
To: Murray, Scott P. (GE Power Portfolio)
Cc: McCurry, Katie; Ollis, Phillip D. (GE Power Portfolio); Goff, Gregory (Gregory.Goff@nrc.gov); Williams, Robert (Robert.Williams@nrc.gov)
Subject: Document Request - NRC Inspection on October 26, 2020
Attachments: NRC Doc Request - GNF-A IR 2020-004 - Oct 2020.pdf

Dear Mr. Murray,

The NRC will conduct a routine inspection at the Global Nuclear Fuel facility in Wilmington, NC on October 26, 2020. The inspection will implement the following NRC inspection procedures (IPs):

IP 88015 – Nuclear Criticality Safety (Inspector: Katherine McCurry)
IP 88020 – Operational Safety (Inspector: Joel Rivera)
IP 88025 – Maintenance and Surveillance of Safety Controls (Inspector: Gregory Goff)

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

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

Best Regards,

Joel Rivera - Ortiz

Sr. Fuel Facility Inspector
U.S. Nuclear Regulatory Commission/Region-II
Division of Fuel Facility Inspection
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404-997-4825

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September 17, 2020

INSPECTION DOCUMENT REQUEST

Licensee: Global Nuclear Fuel – Americas (GNF-A), L.L.C.

Facility: GNF-A in Wilmington, North Carolina

Docket Number: 07001113

License Number: SNM-1097

**Inspection Report
Number:** 2020-004

Enterprise Number: EPID: I-2020-004-0067

Inspection Dates: October 26 – 30, 2020

Inspection Procedures IP 88020 – Operational Safety [**Joel Rivera-Ortiz**]
& Lead Inspectors: IP 88015 – Nuclear Criticality Safety [**Katherine McCurry**]
IP 88025 – Maintenance & Surveillance of Safety Controls [**Gregory Goff**]

NRC Team Lead: Joel Rivera-Ortiz
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INSPECTION DOCUMENT REQUEST

The following is a broad list of documents the U.S. NRC inspectors are interested in reviewing prior to the on-site inspection visit. The current version of these documents is expected unless specified otherwise. Electronic media is preferred for receiving the information, if readily available (preferably MSWord format or searchable “.pdf” files). The documents provided in response to this request should contain enough information to facilitate the selection of specific inspection samples. Some of the information requested may not apply to the facility. The licensee is not required to provide documents that are already available in ADAMS. If there are any questions or concerns regarding the information requested, please contact the NRC inspection team lead.

IP 88020 – OPERATIONAL SAFETY

Documents Requested for In-Office Preparation

- 1) Latest version of the license application
- 2) Latest version of the Integrated Safety Analysis (ISA) Summary (if different from Revision 23)
- 3) Procedures governing the implementation of the following management measures, as applicable to items relied on for safety (IROFS) and/or other safety controls credited in the license application:
 - Configuration Management
 - Maintenance
 - Training and Qualifications
 - Procedures Development and Implementation
 - Audits and Assessments
 - Incident Investigations and Corrective Action
 - Records Management
 - Quality Assurance (QA) for IROFS
- 4) The inspectors plan to focus their review on Group Nodes 201, “DCP Vaporization” and 406, “UO2 Grinders.” For **IROFS 201-01, 201-05, 201-07, 406-01, 406-03, 406-04, 406-05, 406-09, 406-10, 406-11, 406-13, 505-09, 505-10, 505-14, and 900-04** please provide the following:
 - a. Plant procedures showing the specific operation and implementation of the IROFS. For example, operating procedures showing the implementation of administrative controls or the operation of active engineered controls.
 - b. Procedures and recent records of management measures performed to demonstrate availability and reliability of the IROFS. For example, recent records of testing, inspection, calibration, and preventive maintenance performed on the selected IROFS.
 - c. Procedures and records showing that training requirements for the selected IROFS have been maintained
 - d. Complete configuration management package for recent changes affecting the selected IROFS

- 5) List of corrective action program documents generated in the last 12 months related to problems with IROFS. Please include a brief description of the problem, if practical.
- 6) List of changes implemented in the last 12 months that affected IROFS; including modifications of existing controls, elimination of previous controls, and addition of new controls
- 7) List of changes in the Operations Safety organization in the last 12 months that were subject to the position-specific requirements of the license
- 8) List of temporary compensatory measures put in place in the last 12 months to support degraded or failed IROFS. Please include a brief description of the compensatory measure, if practical.
- 9) Copy of the most recent self-assessment and/or audits report in the area of Operational Safety
- 10) Contact information for key personnel expected to support the Operation Safety inspection.

Documents/Support Requested for On-site Inspection

- 1) Site support to conduct plant tours and observe ongoing operations in the control room and other production areas
- 2) Site support to coordinate interviews with plant operators
- 3) Site support to attend the “plan of the day” meetings
- 4) Please keep inspectors informed of plant operations on a daily basis
- 5) Please inform the inspectors of any updates to the Operational Safety program that have occurred since this document request was issued

IP 88015 – Nuclear Criticality Safety (NCS)

Documents Requested for In-Office Preparation

- 1) Any new or revised NCS program procedures since the last NCS inspection (if none, please indicate)
- 2) List of corrective action program entries or internal events since the last NCS inspection related to NCS issues, including the criticality accident alarm system (CAAS)
- 3) Criticality safety evaluations (CSEs) for the following systems or processes:
 - DCP Vaporization
 - UO2 Grinders (**IROFS 406-01, 406-03, 406-04, 406-05, 406-09, 406-10, 406-11, 406-13, 505-09, 505-10, and 505-14**)
- 4) Any new or revised CSEs since the last NCS inspection (if none, please indicate)
- 5) Procedures related to the following:
 - NCS weekly and internal audits
 - NCS engineer qualification program
 - CSE development
- 6) List of any new qualifying/qualified NCS staff since the last NCS inspection
- 7) Audit(s) and self-assessment(s) of the NCS program since the last NCS inspection
- 8) NCS training materials/exam for personnel who handle special nuclear material (SNM)
- 9) Emergency response procedure and training material for criticality accident scenarios
- 10) Validation report for NCS computer codes (if revised since the last NCS inspection)
- 11) Contact information for key personnel expected to support the Nuclear Criticality Safety inspection.

Documents/Support Requested for On-site Inspection

- 1) Results of NCS inspections (i.e. weekly assessments/walkdowns) since the last NCS inspection
- 2) Qualification and training records for any newly qualified/qualifying NCS engineers (if applicable)
- 3) Maintenance work orders and testing/calibration records of the CAAS for the last 12 months. Please inform the inspectors at the entrance meeting if there will be any CAAS related activities (i.e. testing, maintenance, modifications, etc.) during the inspection week.
- 4) Logistic support to accompany an NCS engineer during a weekly walk-down
- 5) Coordinate an interview with the NCS manager

IP 88025 – MAINTENANCE & SURVEILLANCE OF SAFETY CONTROLS

Documents Requested for In-Office Preparation

- 1) Complete work packages of recent maintenance and surveillance activities performed for **IROFS 201-01, 201-07, 406-01, 406-03, 406-04, 406-05, 406-09, 406-10, 406-11, 406-13, and 505-14.**
- 2) List of corrective action program entries for the last 12 months pertaining to maintenance and surveillance of IROFS
- 3) Most recent independent audits, self-assessments, and QA surveillances, as applicable, pertaining to maintenance and surveillance of safety controls. Please include the procedure governing audits and assessments, and the qualifications of the auditor(s).
- 4) List of maintenance and surveillance activities scheduled for the week of NRC's on-site inspection.
- 5) Maintenance and Surveillance Organizational Chart and list of changes in the organization that are applicable to the position-specific requirements of the license. Please include a brief description of the changes.
- 6) Procedure(s) governing maintenance activities and the overall maintenance program/work control, including post maintenance testing, functional testing and surveillance activities.
- 7) Procedure(s) governing the control and use of measurement & testing equipment (M&TE) for equipment used to perform calibrations including calibration of safety related equipment
- 8) Procedure(s) governing pre-job planning/pre-job briefs
- 9) Procedure(s) governing work packages (i.e. documentation of activities planned, executed, and completed)
- 10) List of any maintenance staff qualified in the last 12 months. Please include their qualification date and the associated procedure(s) that govern training for the maintenance organization.
- 11) Schedule for routine meetings conducted by the maintenance organization (i.e. maintenance plan of the day, turnover meetings, planning/work control meetings, etc.)
- 12) Please provide contact information for staff in the organization.
- 13) Contact information for key personnel expected to support the Maintenance and Surveillance inspection.

Documents/Support Requested for On-site Inspection

- 1) The inspectors may select additional samples of maintenance activities completed since the last NRC inspection in this area, with emphasis on risk-significant safety controls. Please provide complete work records of those activities (e.g. final work order packages) upon request.
- 2) The inspectors plan to directly observe a sample of maintenance activities scheduled for the week of the on-site inspection. Please provide updated copies of the daily/week's maintenance and surveillance schedule; keep the inspectors informed of maintenance activities, including emergent, safety significant work; and provide site support to observe selected activities.
- 3) Support to conduct interviews with staff responsible for implementing the maintenance and surveillance program.
- 4) Please inform the inspectors of any updates to the maintenance and surveillance program that have occurred since this document request was issued.