



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**
REGION I
2100 RENAISSANCE BLVD.
KING OF PRUSSIA, PA 19406-2713

April 12, 2021

Chris Fritz, Senior Director,
Operations Support
Alliant Techsystems Operations, LLC
210 State Route 956
Rocket Center, WV 26726

SUBJECT: ALLIANT TECHSYSTEMS OPERATIONS, LLC - NRC INSPECTION NO.
04008850/2021001 AND NOTICE OF VIOLATION

Dear Mr. Fritz:

This letter refers to the inspection conducted on March 1, 2021, at your Rocket Center, WV facility. This inspection examined activities conducted under your license as they relate to public health and safety, and to confirm compliance with the Commission's rules and regulations and with the conditions of your license. Within these areas, the inspection consisted of selected examination of procedures and representative records, observations of activities, and interviews with personnel. Additional information was requested on March 1, 2021, and received on March 9, 2021. A final exit meeting was held with you and your staff on March 30, 2021.

Based on the results of this inspection, the NRC has determined that one Severity Level IV violation(s) of NRC requirements occurred. The violation was evaluated in accordance with the NRC Enforcement Policy. The current Enforcement Policy is included on the NRC's Web site at <https://www.nrc.gov/about-nrc/regulatory/enforcement/enforce-pol.html>. The violation is cited in the enclosed Notice of Violation (Notice) because the violation was identified by the NRC.

You are required to respond to this letter and should follow the instructions specified in the enclosed Notice when preparing your response. If you have additional information that you believe the NRC should consider, you may provide it in your response to the Notice. The NRC review of your response to the Notice will also determine whether further enforcement action is necessary to ensure compliance with regulatory requirements.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter and your response will be made available electronically for public inspection in the NRC Public Document Room or from the NRC document system (ADAMS), accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>. To the extent possible, your response should not include any personal privacy, proprietary, or safeguards information so that it can be made available to the Public without redaction.

If you have any questions regarding this matter, please contact Randolph Ragland of my staff at 610-337-5083 or via electronic mail at Randolph.Ragland@nrc.gov.

C. Fritz

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Thank you for your cooperation.

Sincerely,

Christopher G. Cahill, Chief
Commercial, Industrial, R&D
and Academic Branch
Division of Radiological Safety and Security
Region I

Docket No. 04008850
License No. SUB-1440

Enclosure:
Notice of Violation

cc w/ enclosure
George Sherman, Radiation Safety Officer
State of West Virginia

ALLIANT TECHSYSTEMS OPERATIONS, LLC - NRC INSPECTION NO. 04008850/2021001
 AND NOTICE OF VIOLATION DATED APRIL 12, 2021

DOCUMENT NAME: [https://usnrc.sharepoint.com/teams/Region-I-CIRDA/Inspection Documentation/Inspection Documentation - Draft/LSUB-1440.2021001.docx](https://usnrc.sharepoint.com/teams/Region-I-CIRDA/Inspection%20Documentation/Inspection%20Documentation%20-%20Draft/LSUB-1440.2021001.docx)

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OFFICE	RI: DNMS	RI: DNMS	RI: DNMS		
NAME	ETindle-Engelmann/EDTE	RRagland (RCR)	CCahill (CGC)		
DATE	03/30/2021	04/05/2021	04/08/2021		

OFFICIAL RECORD COPY

NOTICE OF VIOLATION

Alliant Techsystems Operations, LLC
Rocket Center, WV

Docket No. 04008850
License No. SUB-1440

During an NRC inspection conducted on March 1, 2021, one violation of NRC requirements was identified. In accordance with the NRC Enforcement Policy, the violation is listed below:

10 CFR 20.1802 requires that the licensee control and maintain constant surveillance of licensed material that is in a controlled or unrestricted area and that is not in storage.

Contrary to the above, on March 1, 2021, Alliant Techsystems Operations, LLC did not control and maintain constant surveillance of licensed materials that was in a controlled or unrestricted area and that was not in storage. Specifically, the licensee left at least 188 kg of depleted uranium in the D.U. Operations Building unattended with an exterior door open for an undetermined amount of time.

This is a Severity Level IV violation (Enforcement Policy Section 6.7).

Pursuant to the provisions of 10 CFR 2.201, Alliant Techsystems Operations, LLC, is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555, with a copy to the Regional Administrator, Region I, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. If an adequate reply is not received within the time specified in this Notice, an order or a Demand for Information may be issued as to why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

If you contest this enforcement action, you should also provide a copy of your response to the Director, Office of Enforcement, United States Nuclear Regulatory Commission, Washington, DC 20555-0001. Under the authority of Section 182 of the Act, 42 U.S.C. 2232, any response which contests an enforcement action shall be submitted under oath or affirmation.

Your response will be placed in the NRC Public Document Room (PDR) and on the NRC Web site. To the extent possible, it should, therefore, not include any personal privacy, proprietary, or safeguards information so that it can be made publicly available without redaction. However, if you find it necessary to include such information, you should clearly indicate the specific information that you desire not to be placed in the PDR, and provide the legal basis to support your request for withholding the information from the public.

In accordance with 10 CFR 19.11, you may be required to post this Notice within two working days of receipt.

Dated This 12 day of April 2021

U.S. NUCLEAR REGULATORY COMMISSION
REGION I

INSPECTION REPORT

Inspection No. 04008850/2021001
Docket No. 04008850
License No. SUB-1440
Licensee: Alliant Techsystems Operations, LLC
Address: Alliant Techsystems Operations, LLC
210 State Route 956
Rocket Center, WV 26726
Inspection Dates: March 1, 2021
Exit Meeting: March 30, 2021

Inspector(s): _____ date _____
Elizabeth D. Tindle-Engelmann
Health Physicist
Medical and Licensing Assistance Branch
Division of Nuclear Materials Safety

_____ date _____
Randolph C. Ragland, Jr.
Senior Health Physicist
Commercial, Industrial, R&D and Academic Branch
Division of Nuclear Materials Safety

Approved By: _____ date _____
Christopher G. Cahill, Chief
Commercial, Industrial, R&D and Academic Branch
Division of Nuclear Materials Safety

EXECUTIVE SUMMARY

Alliant Techsystems Operations, LLC
NRC Inspection Report No. 04008850/2021001

The NRC conducted a routine, announced inspection to review the organization and scope of activities performed under Alliant Techsystems Operations, LLC's NRC License No. SUB-1440. The licensee is a defense contractor that assembles depleted uranium munitions in Rocket Center, WV.

During the inspection, one apparent violation of NRC requirements was identified. The apparent violations involved the failure to control and maintain constant surveillance of licensed material that is in a controlled or unrestricted area and that is not in storage in accordance with 10 CFR 20.1802.

REPORT DETAILS

1. Organization and Scope of the Program

a. Inspection Scope

The inspectors reviewed the organization and scope of activities performed under Alliant Techsystems Operations, LLC NRC License No. SUB-1440. Information was gathered through direct observation of licensed activities, interviews with licensee staff, a review of selected records, and a tour of the facilities.

b. Observations and Findings

The licensee assembles munitions which contain depleted uranium (DU). The licensee receives machined DU and then trained personnel assemble the munitions manually while wearing gloves. The licensee only handles DU in one building which is called the D.U. Operations building. There is a storage bunker where the DU is kept until use. The workload fluctuates based on contracts with the Department of Defense.

The Radiation Safety Officer (RSO) is onsite daily. The RSO is supported by the safety manager and technicians from another department. The RSO is responsible for oversight of the program while the technicians perform surveys and area audits. The licensee maintains a Radiation Safety Committee (RSC) that meets regularly to discuss ALARA matters, incidents, and radiation safety.

2. Review of Licensed Activities

a. Inspection Scope

The inspectors performed an announced routine inspection utilizing NRC Inspection Procedure 87126, "Industrial/Academic/Research Programs" to conduct the inspection. Information was gathered through interviews with cognizant personnel, direct observation of licensed activities, review of records, tours of the facilities, and through the performance of independent radiation surveys.

b. Direct Observations, Interviews, and Records Review

The inspectors reviewed select records including the ambient radiation level surveys, contamination surveys, dosimetry, DOT/HAZMAT training, instrument calibrations, and the radiation safety manual.

Inspection Report No. 2016-001 described a violation pertaining to 49 CFR 172 training requirements. In accordance with the corrective actions described in the previous inspection, the RSO received DOT training and the licensee implemented a training program for all HAZMAT employees. The training was conducted annually in the licensee's learning management system and was supplemented by a job instruction. This closes the previous violation.

The licensee was operational, but at a reduced capacity. The inspectors toured the licensee's facility and observed one individual handling licensed material. During the facility tour it was determined that the licensee failed to control and maintain constant surveillance of licensed material that was in a controlled that was not in storage in accordance with 10 CFR 20.1802. Specifically, during the tour the inspectors observed an exterior door that was open and unattended. Upon questioning, the licensee immediately closed and secured the door. The licensee determined that the latch on the door was broken. As a preventative action the licensee ordered a new door with a functional closure.

Independent Radiation Measurements

The inspectors performed independent ambient radiation level and contamination surveys at the facility. The surveys were conducted in the D.U. Operations building; the survey results were consistent with the licensee's postings, the licensee's results, and applicable regulatory limits.

c. Conclusions

During this inspection, one apparent violations of NRC requirements was identified. The following is the apparent violations:

10 CFR 20.1802 requires that the licensee control and maintain constant surveillance of licensed material that is in a controlled or unrestricted area and that is not in storage.

Contrary to the above, on March 1, 2021, the licensee did not control or maintain constant surveillance of 188 kg of depleted uranium located in D.U. Operations Building, which is a controlled area. Specifically, on March 1, 2021, the licensee left the licensed material in the D.U. Operations Building unattended with an exterior door open for an undetermined amount of time.

This is a Severity Level IV violation (Enforcement Policy Section 6.7).

3. Exit Meeting

On March 1, 2021, the inspectors conducted an onsite exit debrief with the licensee. The inspection findings and apparent violation were discussed. The licensee acknowledged the inspection findings and committed to developing corrective and preventative actions. The licensee created a corrective action plan and submitted it to the NRC on March 9, 2021. On March 30, 2021 the inspectors conducted a virtual exit meeting with the licensee; the inspection apparent violation and need for a more in-depth root cause analysis was discussed.

ATTACHMENT

PARTIAL LIST OF PERSONS CONTACTED

Individual(s) present at entrance meeting

+ Individual(s) present for onsite inspection debrief on March 1, 2021

^ Individual(s) present for virtual exit meeting on March 30, 2021

#+^ George Sherman, RSO

#+^ Zack LeMasters, Safety Manager

+ Mary Ellen Patt, NPT Manager

^ Bill Hixon, Director, Operations

^ Chris Fritz, Senior Director, Operations Support

INSPECTION PROCEDURES USED

IP 87126, Industrial/Academic/Research Programs

LIST OF NRC SURVEY INSTRUMENT USED

Ludlum Model 2401-P, serial number 285217 (calibration exp. date: September 30, 2021)

Ludlum Model 30, NRC serial number 25016145, combined with a Ludlum 44-1 probe, NRC serial number 23205G (calibration exp. Date: January 20, 2022)

LIST OF ACRONYMS USED

DU: Depleted Uranium

NRC: Nuclear Regulatory Commission

RSC: Radiation Safety Committee

RSO: Radiation Safety Officer