



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**
REGION II
245 PEACHTREE CENTER AVENUE N.E., SUITE 1200
ATLANTA, GEORGIA 30303-1200

October 25, 2021

Mr. Lance Stephens
Site Manager
Framatome Inc.
2101 Horn Rapids Road
Richland, WA 99354

SUBJECT: FRAMATOME-RICHLAND – INTEGRATED INSPECTION REPORT
07001257/2021003

Dear Mr. Stephens:

On September 16, 2021, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection at Framatome-Richland and discussed the results of this inspection with you and other members of your staff. The results of this inspection are documented in the enclosed report.

No violations of more than minor significance were identified during this inspection.

This letter, its enclosure, and your response (if any) will be made available for public inspection and copying at <http://www.nrc.gov/reading-rm/adams.html> and at the NRC Public Document Room in accordance with Title 10 of the *Code of Federal Regulations* 2.390, "Public Inspections, Exemptions, Requests for Withholding."

Sincerely,

/RA/

Eric C. Michel, Chief
Projects Branch 2
Division of Fuel Facility Inspection

Docket No. 07001257
License No. SNM-1227

Enclosure:
As stated

cc w/ encl: Distribution via LISTSERV®

SUBJECT: FRAMATOME-RICHLAND – INTEGRATED INSPECTION REPORT
07001257/2021003 – DATED October 25, 2021

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NAME	T. Vukovinsky	G. Goff	M. Ruffin	B. Adkins	E. Michel
DATE	10/22/2021	10/22/2021	10/22/2021	10/22/2021	10/25/2021

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**U.S. NUCLEAR REGULATORY COMMISSION
Inspection Report**

Docket Number: 07001257

License Number: SNM-1227

Report Number: 07001257/2021003

Enterprise Identifier: I-2021-003-0116

Licensee: Framatome Inc.

Facility: Framatome-Richland

Location: Richland, WA

Inspection Dates: September 13, 2021 to September 16, 2021

Inspectors: B. Adkins, Sr. Fuel Facility Projects Inspector
G. Goff, Fuel Facilities Inspector
M. Ruffin, Fuel Facility Inspector

Approved By: Eric C. Michel, Chief
Projects Branch 2
Division of Fuel Facility Inspection

Enclosure

SUMMARY

The U.S. Nuclear Regulatory Commission (NRC) continued monitoring the licensee's performance by conducting an integrated inspection at Framatome-Richland, in accordance with the fuel cycle facility inspection program. This is the NRC's program for overseeing the safe operation of licensed fuel cycle facilities. Refer to <https://www.nrc.gov/materials/fuel-cycle-fac.html> for more information.

List of Violations

No violations of more than minor significance were identified.

Additional Tracking Items

None.

PLANT STATUS

The Framatome facility converts uranium hexafluoride (UF₆) into uranium dioxide (UO₂) for the fabrication of low-enriched fuel assemblies used in commercial light water reactors. During the inspection period, normal production activities were ongoing.

INSPECTION SCOPES

Inspections were conducted using the appropriate portions of the inspection procedures (IPs) in effect at the beginning of the inspection unless otherwise noted. Currently approved IPs with their attached revision histories are located on the public website at <http://www.nrc.gov/reading-rm/doc-collections/insp-manual/inspection-procedure/index.html>. Inspections were declared complete when the IP requirements most appropriate to the inspection activity were met consistent with Inspection Manual Chapter (IMC) 2600, "Fuel Cycle Facility Operational Safety and Safeguards Inspection Program." The inspectors reviewed selected procedures and records, observed activities, and interviewed personnel to assess licensee performance and compliance with Commission rules and regulations, license conditions, site procedures, and standards.

SAFETY OPERATIONS

88020 - Operational Safety

The inspectors evaluated selected aspects of the licensee's Operational Safety program to verify compliance with selected portions of 10 CFR 70, including 70.61 and 70.62, as well as Chapter 3, "Integrated Safety Analysis (ISA) and ISA Summary" and Chapter 11, "Management Measures" of the facility's license application, and applicable licensee procedures.

Identification of Safety Controls and Related Programs (IP Section 02.01)

The inspectors selected specific process areas for inspection based on the safety basis information of the facility, the risk/safety significance of the process areas, the description of plant changes submitted to the NRC, and past plant performance documentation. For the process areas of interest, the inspectors selected a sample of accident sequences in nuclear criticality based on the information provided in the integrated safety analysis (ISA) summary and nuclear criticality safety analysis. The process area and accident sequences selected for review are listed below:

- Process Area is UO₂ Powder - System 90 with the following accident sequences:
 - Accident Sequence 090-1.2, > 18.43 kg water is transferred to a 45-gallon drum without neutron-absorbing inserts and containing > 40 kg UO_x when wet or unconverted ADU is discharged from the calciner
 - Accident Sequence 090-1.3, > 18.43 kg water is transferred to a 45-gallon drum without neutron-absorbing inserts and containing > 40 kg UO_x when significant condensation occurs at the discharge end of the calciner
 - Accident Sequence 090-4.6, 18.43 kg water or equivalent moderator enters powder production areas of the UO₂ powder production system in room 104A and leaks into a 45-gallon drum without neutron-

- absorbing inserts, containing > 40 kg UO₂, and located inside the calciner drop enclosure
- Accident Sequence 090-5.1, > 15 kg of hydrogenous grease from the calciner bellows leaks into a 45-gallon drum without neutron-absorbing inserts, which contains > 24 kg UOx
 - Accident Sequence 090-6.3, the drum scale interlock fails to prevent drum overfill and the calciner discharge drop leg fills up with UOx. > 40 kg UOx accumulates in an unfavorable geometry inside the calciner drop enclosure, some of which has fallen from the powder discharge drop leg when the operator raises the fill lid and attempts to remove the drum and the spill is then moderated from a roof or pipe leak
 - Accident Sequence 090-6.6, a process upset causes discharge from the ADU calciner of a significant quantity of UOx moderated at > 2 wt% - The diverter valve fails to change position after indication of high moisture, and a 45-gallon drum is not in place and > 40 kg moderated UOx accumulates in an unfavorable geometry inside the calciner drop enclosure
 - Accident Sequence 090-10.3, > 18.43 kg water is transferred to a 45-gallon drum with neutron-absorbing inserts and containing > 40 kg UOx when significant condensation occurs at the discharge end of the calciner and the drum is transferred from the ADU calciner drop hood to a downstream location without being treated as having moderated contents
 - Accident Sequence 090-11.1, condensation in the unheated portion of calciner results in at least 18 kg U/ft in any portion of the calciner that is moderated with at least five gallons of water

Review of Safety Controls and Related Programs (IP Section 02.02)

The inspectors reviewed information related to enhanced administrative, active-engineered, and passive-engineered safety controls or items relied on for safety (IROFS) for the accident sequences selected above, including the identification of the licensee's assumptions and bounding cases as they apply to each of the selected accident sequences, safety controls, or IROFS. This review was performed to verify that the controls or IROFS were available and reliable to perform their intended safety functions and that the design basis assumptions were reflected in the actual conditions in the field. The specific safety controls selected for review are listed below:

- IROFS 1025.1 (moderation control): nitrogen purge flow (FSA-100) through the RAL prevents the diffusion and condensation of moisture in the unheated portion of the calciner discharge and the interlock will stop the transfer to a 45-gal drum if flow is lost; active engineered control (AEC), criticality safety
- IROFS 1502 (neutron absorber control): powder drums are equipped with neutron-absorbing inserts, administrative control, criticality safety; passive engineered control (PEC), criticality safety
- IROFS 2203 (mass control): a scale interlock alerts operations and prevents transfer in NIMS to prevent UOx powder discharge if there is no drum present,

and also prevent discharge to a drum that contains no neutron-absorbing insert, enhanced administrative control (EA), criticality safety

- IROFS 2204 (moderation control): an in-line moisture monitor interlock stops input to the 45-gal drum, AEC, criticality safety
- IROFS 2206 (moderation control): the hood is equipped with a drum-in-place/lid-down interlock that will stop the rotary valve if a drum is not in place to receive the material, preventing spray from entering the drum and preventing spill of UOx powder and the hood itself also provides protection against water spray, AEC, criticality safety
- IROFS 2207 (moderation control): the auto greaser is set to deliver no more than 12 lbs. (5.44 kg) per month - if a full 12 lbs. (5.44 kg) reservoir is emptied within a month, NCSS is notified and corrective actions are taken; passive engineered control, criticality safety
- IROFS 2226 (mass/moderation control): a drum weight monitor is interlocked to stop the rotary valve and prevent drum overflow, AEC, criticality safety

Implementation of Safety Controls (IP Section 02.03)

For the selected safety controls listed above, the inspectors reviewed management measures to verify proper implementation in accordance with 10 CFR 70 and Chapter 11 of the license application. This review was performed to verify that selected safety controls or IROFS were present, available, and reliable to perform their safety function and that the design basis assumptions were reflected in the actual conditions in the field. The inspectors conducted the following activities to verify the implementation of selected safety controls:

- conducted a walk-down of the ADU powder processing area (System 90) including the following IROFS: 1025.1, 2203, 2204, 2206, 2207, and 2226 in the ADU powder processing area
- reviewed operations procedure SOP-40276, "Calciner Operation - ADU Line 2"
- observed performance of the following IROFS calibration/maintenance procedure: C355P003, I3E Primary Roof Leak Water Alarms 6 Month Interval
- observed performance of the following IROFS calibration/maintenance procedure: C355I001, Scale Powder Storage BLEU 3 Month Interval

Safety Control Support Programs (IP Section 02.04)

The inspectors assessed additional management measures that support the availability and reliability of the selected safety controls to verify these were implemented in accordance with 10 CFR 70 and Chapter 11 of the license application. Specifically, the inspectors conducted the following:

- reviewed operator training/qualification records for one ADU System 90 operator
- reviewed functional testing/calibration work orders for IROFS 2203, 2204, 2206, and 2207

- reviewed the following CAP entries related to failure and degradation of IROFS: 2020-2378; 2020-2465; and 2020-2734
- reviewed the following non-IROFS related CAP entries associated with regulatory requirements: 2021-443
- reviewed the December 2020 NCS Audit/Inspection Report covering ADU
- reviewed the last four Biannual Chemical Safety Audits (latter half of 2019 - first half of 2021)

FACILITY SUPPORT

88070 - Permanent Plant Modifications

The inspectors conducted a review to verify the licensee had established and implemented a configuration management system to evaluate, implement, and track changes to the facility in accordance with the applicable requirements in Title 10 of the U.S. Code of Federal Regulations (10 CFR) Section 70.72 and the License Application, Chapter 11 Section 11.1, "Configuration Management." The inspectors' review also verified the licensee had established management measures for changes to the facility in accordance with 10 CFR 70, Subpart H and the License Application, and that modifications involving new processes met the requirements in 10 CFR 70.64.

Sample Selection (IP Section 02.01)

The inspectors reviewed licensing documents, changes the licensee determined did not require pre-NRC approval under 10 CFR 70.72, and changes that affected the integrated safety analysis summary (ISA) to select changes/modifications to review. To assess whether the licensee conducted evaluations according to their established configuration management system, the inspectors selected the following plant modifications, identified as Engineering Change Notices (ECNs) to review:

- ECN 8909, Line 6 Press Install
- ECN 8910, COE-Gd Grinder Line Install
- ECN 8911, IX Column Demo and Prep
- ECN 8921, Cylinder Wash Snorkel Improvements

Facility Change/Modification Process (IP Section 02.02)

The inspectors reviewed the selected modifications listed above to verify the licensee established a configuration management system in accordance with 10 CFR 70.72 and the conditions of the license. Specifically, the inspectors conducted the inspections activities listed below:

- reviewed the following procedures
 - MCP-30131, Safety/Licensing Evaluation of Facility Changes
 - MCP-30379, Construction or Modification Change Control
 - MCP-30379 A, Construction or Modification Change Control

- MCP-30379 B, Construction or Modification Change Control
- MCP-30379 C, Construction or Modification Change Control
- MCP-30379 D, Construction or Modification Change Control
- MCP-30379 E, Construction or Modification Change Control
- interviewed licensee staff, performed walk-downs of Line 6, newly installed ion exchange (IX) columns, and the cylinder washing station and reviewed the corresponding configuration management packages
- reviewed facility documentation associated with the selected changes
- reviewed the Summary of Facility Changes made during Calendar Year 2020, the ECNs Completed list from January 1, 2021 until August 20, 2021, and a sample of the ISA Summary submitted in January 2021

Management Measures (IP Section 02.03)

For the selected modifications, the inspectors reviewed the management measures established for affected IROFS (or credited safety controls) to verify the management measures ensured the IROFS (or credited safety controls) were available and reliable to perform their intended function as required by 10 CFR 70.61 and the license. Specifically, the inspectors conducted the inspection activities listed below:

- interviewed project engineers and reviewed change management procedures
- reviewed affected procedures
- reviewed test procedures
- interviewed licensee staff
- reviewed training records
- reviewed the following test records:
 - C370P002 Hour Meter Readings
 - C370P003 Pellet Press 500HR
 - C370P001 Press Line Sludge Measurement
 - PG 000089 Lifter/Rotator
 - PM 004775 BLEU Pellet Press
 - IRM03856 Balance L6 Press
 - PG000214-0004 CO2 Monitor Alarm
 - C395P006 Boat Dumper to Hopper
 - C395I003 Scale L6 Sludge
 - IRM05201 Scale Grinder Sheet Load
 - C395I002 Scale Inspection Reject WIT-404
 - IRM01142 Transmitter D/P UO
 - IX Column Demo & Prep Functional Test
 - C065P007 UF6 Cylinder Wash IROFS Hardware Functional Test
- reviewed condition reports
- reviewed the most recent audit of the configuration management system

License Application Changes (IP Section 02.04)

For the selected modifications, the inspectors interviewed licensee staff and reviewed applicable sections of the license application to verify the licensee evaluated license application changes and conducted NRC pre-approval screenings in accordance with the license requirements. Specifically, the inspectors conducted the inspection activities listed below:

- reviewed the "Safety/Licensing Evaluation of Facility Changes" procedure used to determine whether NRC pre-approval of license application changes is required to verify the licensee correctly evaluated license application changes
- interviewed licensee staff and reviewed license application change evaluations associated with the selected ECNs

New Processes at Existing Facilities (IP Section 02.05)

The licensee had not implemented any new facility processes at the time of the inspection. Therefore, the inspectors' review did not include evaluations of whether the licensee addressed the baseline design criteria and defense-in-depth as stipulated in 10 CFR 70.64.

Records Retention (IP Section 02.06)

The inspectors reviewed a sample of plant documents impacted by the selected modifications to verify the licensee maintained records of facility changes in accordance with the license requirements and 10 CFR 70.72. The sample of documents included:

- applicable operating procedures
- system drawings listed in the documents reviewed section of this report
- ISA Summary Chapters:
 - 9A - UO2 Building
 - 9E - UO2 Building
- NCSA-960

INSPECTION RESULTS

No issues were identified.

EXIT MEETINGS AND DEBRIEFS

The inspectors verified no proprietary information was retained or documented in this report.

- On September 16, 2021, the inspectors presented the integrated inspection results to Lance Stephens and other members of the licensee staff.

DOCUMENTS REVIEWED

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
88020	Corrective Action Documents	CR-2020-0840	C328I002 Scale WT-1000 Would Not Power Up DEAD IROFS 2203. Not a NCS Infraction.	04/13/2020
		CR-2020-2378	NCS Infraction 20-021 - Two dry SBCs discovered stacked in I3A Dry Storage Array - IROFS 2107 Failed	10/21/2020
		CR-2020-2465	NCS Infraction 20-022 SURF valve FV-32901 failed to close. IROFS 404.30 Degraded	10/28/2020
		CR-2020-2734	IRM C163I102-0010 found OOT (IROFS 2310). Channel 3 Gmma monitor fot TK-780 was OOT. The OOT reading would have been 9.84 gU/L.This value is still below the NCSS limit set point of <10 gU/L.	12/04/2020
		CR-2021-0443	NRC Inspection 2021-001	02/25/2021
	Drawings	CSA-611090	UF6 ADU PROCESS CALCINING SYSTEM P&ID	Revision 14
		CSA-611090	UF6 ADU Process Calcining System P&ID	Revision 15
	Engineering Evaluations	E04-NCSA-090	EHS&L Document Criticality Safety - NCSA UO2 Powder Production	Revision 17
		E15-01-2.9A	EHS&L Document, Part 2 - Chapter 9A - UO2 Building	Revision 18
	Miscellaneous		Portfolio Curriculum Item Status Report for User 47043	09/15/2021
			List of Justifications for Continued Operations (JCOs) for CY 2021	07/01/2021
		Certificate	Certification of Working Weights	05/28/2021
		Plant Changes	List of Plant Changes in CY 2021	08/20/2021
	Procedures	ADM-00006	Administrative Procedure for Documentum REDS Documents	Version 33.0
		ADM-00008	Control of Operator Aids in Richland Operations	Version 8.1
		AID-10277	Reference 583 EdgeTech Dew Point Monitor Model COM.AIR	Version 4.0
		AID-10340	Reference 1003 GSE Model 350 Digital Weight Indicator With Various Weight Platforms	Version 3.0
		E04-05-01	Nuclear Criticality Safety Standards	Version 18
		E10-08-002	Organization and Administration	Version 7.0
		E10-08-009	Environmental Protection	Version 4.0
E12-03-058		Incident Investigation/Corrective Action Audit	Version 4.0	

Inspection Procedure	Type	Designation	Description or Title	Revision or Date	
		E12-03-063	Other QA Elements Audit	Version 4.1	
		MCP-30324	Richland Procedure Writers Guide	Version 14.1	
		MCP-30379	Construction or Modification Change Control	Version 17.0	
		MCP-30383	Preventive Maintenance	Version 5.3	
		MCP-30572	Line 2 ADU UO2 Powder Production (System 90) Controls Design Description	Version 6.1	
		SOP-40276	Calcliner Operation - ADU Line 2	Version 24.1	
		SOP-40789	Work Order Instructions	Version 19.0	
		SOP-40791	Maintenance Work Permit (MWP) & Pre-Job Briefing (PJB)	Version 18.0	
		SOP-40839	Instrument Repetitive Maintenance (IRM)	Version 14.0	
		SOP-40841	Preventive Maintenance (PM)	Version 11.0	
	SOP-41068	Training and Qualification	Version 3.1		
	Self-Assessments			2019 Biannual Chemical Safety Audit (2nd Interval)	10/25/2019
				Checklist for Procedure Audit	10/28/2020
				2020 Biannual Chemical Safety Audit (2nd Interval)	10/30/2020
				2021 Biannual Chemical Safety Audit, Part 1	04/07/2021
				NCS Audit Schedule for 2021	
				EHS&L AUDIT/INSPECTION SCHEDULE	
	Work Orders		13444456, 13482450, 13479070, 13474804, 13518893, 13515573	US58510-01 IROFS CALCINER L2 LUBRICATION	Various
			13474805	PM004702 AIRLOCK ROTARY 12MO EL	09/18/2020
			13474806	PM004701 AIRLOCK ROTARY 12MO MWHZ	09/28/2020

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
		13494328	C090P001 - L2 U02 POWDER INTERLOCKS 6MO RE	03/02/2021
		13515283, 13488020, 13467442, 13444456	US19411-93 IROFS SCALE CALCINER DROP DRUM WEIGHT UO IRM data: 80 DS .066, RED, 1012, C	Various
		13515574, 13488295, 13467441, 13444455,	US58525-02 IROFS HYGROMETER CALCIN L2 CAL DROP HYGR IRM data: 5.0 MIA-101, RED, 583, C	Various
		13519411	Manual Call C090I002	08/02/2021
		13522878	C355I001 - Scale PWDR STRG BLEU 3 MO IN (Scale - IROFS - Barrel Powder Storage BLEU)	09/15/2021
		13522889	C355P003 - I3E Primary Roof Leak Water Alarms 6-month Interval	09/14/2021
		88070	Corrective Action Documents	CR-2021-0973
	Drawings	08537-GO-08	General Outline 6 Ton Model E Liquid Carbon Dioxide Storage Unit	10/06/08
		08537-SCH-08	Piping Schematic 6 Ton Model E Liquid Carbon Dioxide Storage Unit	10/06/08
		CSA-607,590	Horn Rapids Rd Site General Arrangement Line 6 Pelletizing	006.F
		CSA-607,590	Horn Rapids RD Site General Arrangement Line 6 Pelletizing	006.B
		CSA-607,590		17
		CSA-611065	ADU Process Cylinder Wash P & ID	020.C
		CSA-611070	ADU Process P & ID	018
		CSA-611080, Sheet 1	ADU Process Uranium Recovery P & ID	012
		CSA-611080, Sheet 7	ADU Process Uranium Recovery P & ID	009
		CSA-611080, Sheet 8	ADU Process Uranium Recovery P & ID	009
		CSA-611080, Sheet	ADU Process Uranium Recovery P & ID	019

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
		9		
		CSA-611375	BLEU Project Soft Boat Loader #7 BLEU P&ID	002.E
		CSA-611375	BLEU Project Soft Boat Loader #7 BLEU P 7 ID	002.B
		CSA-611395, Sheet 1	Line 6 Pellet Grinding and Inspection P&ID	006.C
		CSA-611395, Sheet 2	Line 6 Grinder Pellet Grinding and Inspection P&ID	004.C
		CSA-611395, Sheet 3		001.C
		CSA-611395, Sheet 4		-.A
		CSA-611395, Sheet 5		-.A
		CSA-611950	Nitric Acid Storage & Distribution System	013
		CSA-611960	Ventilation Duct System K31 Flow Diagram	008.A
		CSA-614937	Facilities Waste & Bucket Storage Grid Location	-.A
		CSA-614937	Facilities Waste & Bucket Storage Grid Location	-.A
		CSA-618159	Ceramics GAD Boat Loader Assembly	00B
		CSA-618167	GAD Pellet Press	
		EMF-602683	One Line Diagram North UO2 Building Distribution Panel "B-1"	019.A
		EMF-606529	UF6 Line 2 Cylinder Wash Detail Diagrams and Schematics	001.A
		EMF-6161783	Room 100 CO2 Detection Panel	
		EMF-6161783, Sheet 509	Line 6 PBL CO2 Remote IO Power Distribution	
		EMF-6161783, Sheet 817	Line 6 PBL CO2 Remote IO Inputs and Outputs	
		EMF-616783	Line 6 PBL CO2 Remote IO Panel Layout	
		EMF-616783	Room 157 CO2 Detection Panel	
		EMF-617056, Sheet 001	BLEU Conversion Oxide Pellet Building One-Line Diagram	001.A
		EMF-618022	Line 3 Grinder Line Boat Dumper	000
		EMF-618025	Boat Inverter Assembly Boat Inverter Enclosure	000

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
		EMF-618053-34	Sheet Rotator Assembly Spacer	000
		EMF-618157	GAD Boat Inverter GAD Inverter Assembly	A
		EMF-618160	Soft Boat Loader GAD Enclosure Assembly	00B
	Engineering Changes	ECN 8909	Line 6 Press Install	4/9/20
		ECN 8910	COE-GD Grinder Line Install	9/23/19
		ECN 8911	IX Column Demo & Prep	10/1/19
		ECN 8921	Cylinder Wash Snorkel Improvements	9/8/20
	Miscellaneous	E10-08-011	SNM-1227-Chapter 11 Management Measures	2.1
	Procedures	MCP-30131	Safety/Licensing Evaluation of Facility Changes	12
		MCP-30379	Construction or Modification Change Control	17
		MCP-30379 A	Construction or Modification Change Control -Initiation	5.1
		MCP-30379 B	Construction or Modification Change Control –Planning	3.4
		MCP-30379 C	Construction or Modification Change Control - Execution	9
		MCP-30379 D	Construction or Modification Change Control - Controlling	7
		MCP-30379 E	Construction or Modification Change Control - Closure	4.1
		MCP-30383	Preventive Maintenance	5.3
		SOP-40789	Work Order Instructions	19
		SOP-40791	Maintenance Work Permit (MWP) & Pre-Job Briefing (PBJ)	18
		SOP-40839	Instrument Repetitive Maintenance (IRM)	14
		SOP-40841	Preventative Maintenance (PM)	11
		Self-Assessments	FRA_D3SEP_IG_21-014	21_014_Richland_Configuration_Management_Debriefing
	FRA_D3SEP_IG_21-014_IR		Framatome Richland - Configuration Management Program - Inspection from April 20th to 26th 2021	6/2/2021
	MMD-20-001		Annual Configuration Control Audit Report -- 2020	12/22/2020
	SA 2020-0006		2020 Annual Configuration Control Audit	12/29/2020