

LES-22-070-NRC

5/18/2022



ATTN: Document Control Desk
Director
Office of Nuclear Material Safety and Safeguards
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Louisiana Energy Services, LLC
NRC Docket No. 70-3103

Subject: 10 CFR 70 App A (b), 60 Day Report

On March 7th, 2022, Louisiana Energy Services (LES), dba Urenco USA (UUSA), made an Event Notification to the Nuclear Regulatory Commission (NRC) Operations Center in accordance with 10 CFR 70 App A(a)(4). This notification reported historical instances where construction vehicles may have been allowed near buildings of concern resulting in IROFS appearing to be insufficient to meet the 10 CFR 70.61 performance requirements. Event Notification 55802 details this occurrence.

As required by 10 CFR 70 App A (b), *Twenty-four Hour Reports* will be supplemented within 60 days with the information of 10 CFR 70.50(c)(1), Enclosure 1 provides the written follow-up report within 60 days of the initial report.

Should there be any questions concerning this submittal, please contact Chris Schwarz, Licensing and Performance Assessment Manager, at 575-394-5783.

Respectfully,

Wyatt Padgett

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Padgett
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Wyatt Padgett
Compliance Manager

Enclosure: 10 CFR 70 App A (a) 60 Day Report

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Enclosure 1

10 CFR 70 App A(b)(1) 60 Day Report

10 CFR 70.50(c)(1)

(i) Caller's name, position title, and call-back telephone number;

- The individual who facilitated Event Notification (EN) 55802 was Wyatt Padgett, Compliance Manager. The call-back telephone number for Wyatt Padgett is 575-394-5257.

(ii) Date, time, and exact location of the event;

- The NRC Event Notification was submitted on March 25th, 2022. The location of this event was at Urenco USA in Eunice, New Mexico (Lea County). The affected area is the Controlled Access Area of the UUSA facility.

(iii) Description of the event:

- On March 25th, 2022, as part of the extent of condition review for EN 55770, UUSA identified historical instances where construction vehicles may have been allowed near buildings of concern and our process failed to identify if controls needed to be established for the activities planned. The hazards associated with those construction vehicles were not properly analyzed. UUSA failed to properly document and require controls and during those times, available IROFS appear to be insufficient to meet the performance requirements in § 70.61.
- No unanalyzed vehicles are presently exist near buildings of concern. This event has been entered in UUSA's Corrective Action Program as EV 149990.

(A) Radiological or chemical hazards involved, including isotopes, quantities, and chemical and physical form of any material released;

- There were no radiological or chemical hazards involved and no material was released. The IROFS are designed to prevent an impact with areas of concern resulting in a release of UF₆. No impact to areas of concern occurred during these historical instances of use of construction vehicles inside the Controlled Access Area (CAA).

(B) Actual or potential health and safety consequences to the workers, the public, and the environment, including relevant chemical and radiation data for actual personnel exposures to radiation or radioactive materials or hazardous chemicals produced from licensed materials (e.g., level of radiation exposure, concentration of chemicals, and duration of exposure);

- There were no actual or potential health and safety consequences to workers, the public, or the environment. No unexpected exposure to radioactive materials or hazardous chemicals produced from licensed materials occurred. No impact to areas of concern occurred during

these historical instances of use of construction vehicles inside the Controlled Access Area (CAA).

- (C) The sequence of occurrences leading to the event, including degradation or failure of structures, systems, equipment, components, and activities of personnel relied on to prevent potential accidents or mitigate their consequences; and
- UUSA has identified historical instances, as part of the extent of condition review for EV 149740, where construction vehicles may have been allowed near buildings of concern and UUSA's processes failed to identify if controls needed to be established for the activities planned. These failures to identify required controls occurred during maintenance planning, review and execution for work requiring the use of construction vehicles.
- (D) Whether the remaining structures, systems, equipment, components, and activities of personnel relied on to prevent potential accidents or mitigate their consequences are available and reliable to perform their function;
- The structures, systems, equipment, components, and activities in the unaffected areas remain available and reliable to perform their function. UUSA has established and is maintaining IROFS50b-c and IROFS50a-h barriers across the site at all areas of concern. IROFS50b-c is available and reliable to perform the required safety function to prevent an impact with areas of concern resulting in a release of UF₆.
 - Although not credited in the scenario, IROFS27e and IROFS27c provide protection of the buildings and the footer for IROFS27e on the UBC Pad provides protection for the cylinder pad.
- (iv) External conditions affecting the event;
- No external conditions affected this event.
- (v) Additional actions taken by the licensee in response to the event;
- The condition has been entered into UUSA's accredited Corrective Action Program, EV 149990. This event was discovered as part of the Extent of Condition of EN 55770 which had a Root Cause Evaluation (RCE) conducted in accordance with UUSA's accredited Corrective Action Program.
- (vi) Status of the event (e.g., whether the event is on-going or was terminated);
- The event is not considered to be on-going as no unanalyzed vehicles presently exist near buildings of concern. Additionally, IROFS50b-c and IROFS50a-h barriers have been established across the site at all areas of concern.
- (vii) Current and planned site status, including any declared emergency class;

- No change in site emergency status occurred or will occur in response to this event.

(viii) Notifications, related to the event, that were made or are planned to any local, State, or other Federal agencies;

- No notifications to local, State, or Federal agencies occurred or are planned for this event.

(ix) Status of any press releases, related to the event, that were made or are planned.

- No press releases were made and no press releases are planned.

10 CFR 70.50(c)(2)

(ii) The probable cause of the event, including all factors that contributed to the event and the manufacturer and model number (if applicable) of any equipment that failed or malfunctioned;

- The probable cause of the event is a failure to identify and establish required controls for the activities planned and a failure to properly analyze construction vehicles.

(iii) Corrective actions taken or planned to prevent occurrence of similar or identical events in the future and the results of any evaluations or assessments; and

- An Root Cause Evaluation (RCE) type investigation was been initiated and has been completed in accordance with UUSA's Corrective Action Program. The actions of the RCE are being tracked through the Corrective Action Program and are tied EV 149990. This resolution includes the root cause of the condition, extent of condition, and applicable corrective actions.

(iv) For licensees subject to Subpart H of this part, whether the event was identified and evaluated in the Integrated Safety Analysis.

- The UUSA Integrated Safety Analysis Summary (ISAS), Table 3.7-1 Accident Sequence and Risk Index and Table 3.7-3, External Events and Fire Accident Sequences and Risk Index list the potential accident sequences that were identified that could have consequences that exceed the performance criteria of 10 CFR 70.61 listed in Subpart H.

Items Relied on For Safety (IROFS) necessary to prevent or mitigate event sequences that exceed 10 CFR 70.61 criteria have been identified and are described.

Accident Identifier OC1-1, UBC Storage Pad identifies a fire in a construction site preparations vehicle located near the UBC Storage Pad resulting from an impact or failure of an item in the construction vehicle.

Accident Identifier OC2-1, External Construction identifies an external construction site preparations vehicle failure or human error resulting in an impact to areas of concern.

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IROFS50a and IROFS50h are identified as Preventative Safety Parameters for OC1-1 in Table 3.7-3. IROFS50a & IROFS50h are IROFS and are necessary to prevent or mitigate event sequence OC1-1 that could exceed 10 CFR 70.61.

IROFS50b and IROFS50c are identified as Preventative Safety Parameters for OC2-1 in Table 3.7-3. IROFS50b & IROFS50c are IROFS and are necessary to prevent or mitigate event sequence OC2-1 that could exceed 10 CFR 70.61.