

DOCUMENTATION REQUEST

EFFLUENT CONTROL & ENVIRONMENTAL PROTECTION INSPECTION OPERATIONAL SAFETY INSPECTION

SITE: URENCO-USA (UUSA)

INSPECTION REPORT NUMBER: 2022-003

INSPECTION DATES:

August 22-26, 2022

NRC INSPECTORS:

Lead: Gregory Goff, Gregory.Goff@nrc.gov
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ACCOMPANYING PERSONNEL:

None.

IDENTIFIED LICENSEE CONTACTS:

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ASSOCIATED PROCEDURES:

88020 – Operational Safety (OPS)

88045 – Effluent Control and Environmental Protection (ENV)

DOCUMENTATION REQUESTED

1. Effluent and Environmental Controls (88045) - G. Goff

- a. Latest organizational chart of the ENV division (and their contact information if they can support the inspection).
- b. Procedures relating to calibration and set point verification for liquid and gaseous effluent monitors.
- c. Independent audits or assessments of the ENV program (most recent report) performed since last inspection.
- d. Audits/assessments of subcontracted laboratories/vendors used for processing samples.
- e. Sampling of calibration records for analytical equipment used for analysis of samples that provide data input to effluent releases.
- f. Provide a data stream sample used as input into the last available software calculations and a sample of software printouts that will allow confirmation of public exposure. Include a copy of any available manual backup calculations that was used to confirm the accuracy of the software program.

- g. List of corrective actions for last 12 months pertaining to findings from audits or assessments as well as from any environmental and effluent activities since the last inspection.
- h. Sampling of data sheets relating to daily functional checks/control charts for analytical equipment (if applicable).
- i. Most recent calibration package for stack monitors (rotameters/flowmeters) and/or liquid effluent monitors, as applicable.
- j. Maintenance history (past 12 months) for effluent monitoring equipment.
- k. Operational procedures, such as airborne and liquid effluent sample collection, sample analysis, and data collection/reporting.
- l. Procedures for changing out/maintaining stack filtration systems, waste water treatment systems, and environmental scrubbers.
- m. Documentation that describes and/or defines individual radiological exhaust/ventilation stacks and other gaseous discharge points; and the methods used for collecting samples and/or monitoring airborne radioactive emissions data, calibration of environmental sampling equipment.
- n. Procedures for adding vendors to approved supplier lists and for auditing those vendors; event reporting procedures (including what needs to be reported internally), etc.
- o. For new or changed procedures (since the last inspection), please also include the old procedure, or a markup showing the changes. The change package used to change the procedure, if any. And, include any training associated with the change.
- p. Documents transmitted to local, state, and federal for gaseous/air discharges via stacks, liquid discharges to the sewer, and storm water discharges.
- q. Groundwater sampling data produced within the last year.
- r. Specific air sampling items:
 - Documentation from assessing and/or reassessing flow rates from stacks. When were these calibrations performed?
 - Documentation that presents the actual calculations and their use to quantify and determine compliance with dose to the public.
 - Any occasional hand calculations performed to confirm automated calculations accuracy.
- s. The qualification and training records of any new management in environmental protection.
- t. The documentation for any changes to the environmental monitoring program since the last inspection such as environmental procedure changes.

u. Documentation, including procedure(s), that shows compliance with 10 CFR 20.1406(c).

2. Operational Safety (88020) – L. Cooke and P. Startz

Focus Area: 3LS1 (Startz) and SIT follow-up (Cooke)

- a. Operating procedures for Autoclave #3 (3LS1)
- b. Copies of latest completed maintenance, testing, and evaluations (MT&E) activities for all IROFS on 3LS1. These IROFS are limited to IROFS attached to the autoclave housing that prevent UF₆ escape in some manner, not GEVS.
- c. All accident sequences for the above IROFS
- d. A listing of all IROFS associated with 3LS1
- e. Supporting documentation for all aspects of UF₆ IROFS that prevent escape of UF₆ from Autoclave #3. Again, these IROFS are limited to IROFS attached to the autoclave housing that prevent UF₆ escape, not GEVS.
- f. Any audits/assessments, over the last 12 months, that involves IROFS on all autoclaves
- g. A simple listing of corrective actions, over the last 12 months, that includes all IROFS and management measures
- h. All autoclave P&ID drawings
- i. Documentation of autoclave compliance with ASME Code Case 2211-1 and ASME B31.3
- j. Code Case 185, as listed in the ISA
- k. Drawings and engineering analysis of the sampling system structure to prevent UF₆ cylinder movement within the autoclave
- l. Any documents generated or updated as part of the SIT follow-up analysis not already in the eRoom
- m. Process/Procedure for declaring IROFS inactive
- n. Listing of inactive IROFS

- o. ISA-IAD-0034 Attachment A:
 - Deere Brochure for G-Series 6WD Motor Graders, 622G/GP / 672/GP / 772G/GP / 872G/GP
 - John Deere Brochure for K-Series Loaders, 644K/724K, 167–197 kW (224–264 net hp)
 - Dynapac FAYAT Group data on CC524HF Double Drum Vibratory Rollers
 - JCB Loadall, 512-56 data sheet.pdf
 - Stroke Facts_cdc.gov.pdf
 - Heat Disease Fact_cdc.gov.pdf
 - Emails from Project manager:
 - E-mail – Boden to Riedy, RE_Request est. hrs use of John Deere grader and wheel loader for project, 3-18-2022
 - E-mail – Boden to Newell, RE_Use of forklift, 4-12-2022
 - Excel spreadsheet for calculations of KIPS for 4 pieces of equipment
 - Probability of construction vehicle accidents associated with EV 149740

- p. Safety basis calculation/determination of probability of vehicle accidents with regards to IROFS50

NOTEWORTHY: Other documents may be requested subsequent to this documentation request.

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