



9/1/2022

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 for EN 55770

Reference: 1) (ML22144A178) 10 CFR 70 App A (b) 60 Day Report for EN 55802

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 that three construction vehicles, were allowed into the Controlled Access Area boundary prior to IROFS50b and IROFS50c being declared Operable. Event Notification 55770 details this occurrence.

Per the Special Inspection Team Aug, 25<sup>th</sup> onsite assessment, EN 55770 was retracted with insufficient justification and the 60 Day Report was not provided by the date of May 6<sup>th</sup>, 2022. The written report to supplement Event Notification 55770 is provided by Enclosure 1.

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

Respectfully,

**Wyatt  
Padgett**

Digitally signed by  
Wyatt Padgett  
Date: 2022.09.01  
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Compliance Manager

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

LES-22-113-NRC

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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) 55770 was Barry Love, Licensing Specialist. The call-back telephone number for Barry Love is 575-394-4482.

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

- The NRC Event Notification was submitted on March 7th, 2022. The location of this event was at Urenco USA in Eunice, New Mexico (Lea County). The affected area is the Controlled Access Areas (CAA) of the UUSA facility.

(iii) Description of the event:

- On March 7th, 2022, UUSA made the following report to the NRC:  
The plant is in a safe configuration. Three construction vehicles, a front end loader, road grader and roller, were allowed within the CAA boundary prior to IROFS50b and IROFS50c being declared Operable. The Administrative Control Items Relied on for Safety (IROFS) require physical barriers to be placed around the building of concern. Barriers had been placed but the IROFS had not been declared Operable by a Shift Manager.  
The construction vehicles were removed from the CAA and UUSA reported this event as a 1-hour Report. This event was entered in UUSA's corrective action program as EV 149740 and a causal investigation was performed.
- UUSA initially reported EN 55770 on 3/7/2022 concerning this event. UUSA later retracted EN 55770 on 4/25/2022 based on the conclusions from ISA-IAD-0034, Construction Vehicle Accident Probability Determination in support of EV 149740.
- As a result of the Root Cause Evaluation (RCE), for EV 149740, EN 55802 was reported to the NRC on March, 25<sup>th</sup> 2022. Reference 1 was submitted to the NRC on May 19<sup>th</sup>, 2022, as the follow-up 60 day report.
- During the SIT follow-up inspection the week of August 22<sup>nd</sup>, the NRC inspector concluded that EN 55770 was a reportable event. UUSA is now providing the 60 Day report as required by 10 CFR 70 App A(a)(4).

(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 UF<sub>6</sub>. No impact to areas of concern occurred during use of construction vehicles inside the 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 use of construction vehicles inside the 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

- On March 2, 2022, a contractor offloaded and parked three construction vehicles (a front end loader, road grader and roller) inside the CAA and west of the Central Utilities Building before the required administrative proximity controls were established around the area of concern.
- The construction vehicles remained parked inside the CAA from March 2<sup>nd</sup>, until the 7<sup>th</sup>. The afternoon of March 2<sup>nd</sup>, IROFS50b&c barriers were brought into the CAA and put into place prior to construction activities.
- A Shift Manager, performed a walk down of the IROFS50 b/c barriers on March 7<sup>th</sup>. During this walk down, the Shift Manager noticed the site construction vehicles parked west of the CUB and immediately brought this to the attention of the Day Shift Manager and the Deputy Operations Manager. The Relief Shift Manager informed the Duty Shift Manager.
- Vehicles were removed then from the CAA in an attempt to remove applicability of IROFS50b & 50c contrary to the immediate actions of the Operating Requirements Manual (ORM) for IROFS50b & 50c. These actions were performed from memory and the ORM was not referenced.

(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 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 UF<sub>6</sub>.

- Although not credited in the scenario, IROFS27e 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 as EV 149740 and an RCE was 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 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 as determined by a RCE is that change management from 2016 was Less Than Adequate for ending the "Operate while construct phase" which left inadequate management measures to control inactive IROFS. This resulted in a failure to establish required controls for the activities planned prior to vehicle movement and a failure to properly analyze construction vehicles.

- The UUSA RCE for EV 149740, “Construction Equipment Brought into CAA Prior to IROFS50 Series Declared Operable” has been provided to the member of the NRC Special Inspection Team.

(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

- A RCE type investigation was 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 to EV 149740. This resolution includes the root cause, extent of condition, and applicable corrective actions.
- The Root Cause Team results are as follows:
  - The Root Cause of Change Management was Less than adequate for ending “Operate while Construct phase” has six actions addressing this cause which include changes to procedures and changes to the work control process including ‘line of sight’ requirements and hold points for vehicles entering site.
  - The Contributing Cause of the ORM not being referenced during decision making is addressed by five actions addressing this cause which include clarifications to the IROFS50 series documentation and training improvements.
  - Six additional Contributing Causes were identified and corrective actions created to track implementation.

(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.

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.

LES-22-113-NRC

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.