From:	Timothy Sippel
To:	Morris, Ashley R.; ctgibson@bwtx.com
Cc:	Joseph Grice; Cameron Ubben; Paul Startz; Nicholas Peterka; Lindsey Cooke; Nicole Cortes (She/Her/Hers)
Subject:	Upcoming OPS/ENV inspection
Date:	Friday, June 28, 2024 12:36:00 PM
Attachments:	2024-003 NFS ENV-OPS Document Request.docx

Ashley, Clifton,

This email is to notify you that the U.S. Nuclear Regulatory Commission (NRC) Region II staff will conduct an operational safety (OPS) and environmental protection (ENV) inspection at your facility during the week of July 29, 2024. The inspection will focus on the core inspection procedures described in Inspection Manual Chapter 2600; and will use Inspection Procedures 88020, “Operational Safety,” and 88045, “Effluent Control and Environmental Protection.” The inspectors will be myself, Joseph Grice and Paul Startz. Two other NRC folks are planned to accompany us:

- Cameron ‘Cam’ Ubben, who is accompanying the inspection for inspector qualification purposes, and
- Nicole Cortes, who is accompanying both for familiarization with fuel facilities and to assist with the chemical aspects of the inspection.

Cam will need to be re-badged. If possible, add Cam and maybe Nicole to any CO_2 training that week. You should get initial or revised 277s for Cam and Nicole soon. Please let me know if there are issues getting them in time.

Experience has shown that these inspections are resource intensive both for the NRC inspectors and your staff. In order to minimize the impact to your onsite resources and to conduct a productive inspection, I have attached a request for documents needed for this inspection. It is important that these documents are up to date, complete, and ready for the inspectors upon arrival at the facility.

If possible, an entrance meeting should be scheduled for 14:00 on Monday, with an exit meeting at 16:00 on Thursday. If there are any questions about this inspection or the material requested, particularly in the you find the request unclear or unduly burdensome, please contact me by email, or at 404-997-4525. If you wish we can also setup a call to go over the request and/or logistics, and provide any clarification.

Thank you. – Tim.

OPERATIONAL SAFETY AND
EFFLUENT CONTROL AND ENVIRONMENTAL PROTECTION
INSPECTION DOCUMENT REQUEST

SITE: NFS	**INSPECTION REPORT NUMBER:** 2024-003	
PRE-INSPECTION VISIT:	N/A	
INSPECTION DATES:	July 29 – August 1, 2024	
NRC INSPECTORS:	Timothy Sippel (Lead)	Timothy.Sippel@nrc.gov
	Joseph Grice	Joseph.Grice@nrc.gov
	Paul Startz	Paul.Startz@nrc.gov
ACCOMPANYING PERSONNEL:	Cameron Ubben	Cameron.Ubben@nrc.gov
	Nicole Cortes	Nicole.Cortes@nrc.gov

IDENTIFIED LICENSEE CONTACTS:

Licensing: Ashley Morris, ARMorris@nuclearfuelservices.com
Clifton Gibson, ctgibson@nuclearfuelservices.com

Note: This is a broad list of the documents the NRC inspectors will be interested in obtaining and reviewing during the inspection visit. The current version of these documents is expected unless specified otherwise. The lead inspector can answer questions regarding specific information needs with licensee staff and may request additional documents.

DOCUMENTATION REQUESTED

1. Information Requested for IP 88020 – Operational Safety (Sippel, Grice)

a. Contact information for key licensee personnel expected to support this inspection, including chemical safety engineers
b. Provide the following documents for BPF – ventilation, column dissolvers, and solvent extraction
   - Process Hazards Analysis (PHA), with respect to chemical hazards of co-mingled materials
   - Operations procedures
   - Open/currently active letters of authorization, temporary operating procedures, work arounds, or compensatory measures
   - Chemical safety requirements (e.g., required PPE, required chemical safety training material)
c. List of condition reports for last 12 months
d. Records of organization and personnel changes (e.g., qualifications of new management and organization chart) for the operations organization in the past 12 months
e. Sample qual plans for operators in BPF – ventilation, column dissolvers, and solvent extraction

f. Lists of qualified operators in BPF – ventilation, column dissolvers, and solvent extraction
g. IROFS training material, postings, operating procedures, calibration, SRE Tests procedures, and maintenance plans applicable to IROFS BPF-42, -43, -45, -46, -50 and BUA-49; as well as
    - Last 12 months of completed surveillances/SRE Tests
    - Last 12 months of completed calibrations
    - The safety basis/consequence calculation/documentation for these IROFS
h. Any audits or assessments of operations, ISA, IROFS, operator qualifications, etc… in the past 12 months
i. The two most recent audits or assessments of chemical safety, if any in the past 5 years
j. The procedure for audits and assessments
k. The qualification plan(s) for chemical safety engineers within the ISA, Engineering and Industrial Safety groups
l. The procedure(s), writer's guide, and design guide(s) that apply to conducting, reviewing, documenting and updating chemical safety analyses
m. Procedure for safety analysis of non-routine operations, including operations conducted under an LOA
    - List of safety analyses conducted for LOAs over the last five years
    - Change control procedure governing when to perform safety analyses
n. Provide the plans that describes the inspection and testing requirements for bulk chemical storage tanks, as well as the most recent inspection and test records for each tank
o. Documentation/Discussion of how the ISA is kept up-to-date with changing hazards and information about hazards (e.g., updated chemical hazard information, updated seismic hazard maps)
p. Provide the Chemical Exposure Standards used for hazardous chemicals in BPF – solvent extraction. Discuss how you are meeting Section 6.2.4 of the license application.

2. Information Requested for IP 88045 – Effluent Control and Environmental Protection (Startz)

a. Organizational Chart, with respect to personnel involved in Environmental Protection and Effluent Control (with contact information if they are supporting the inspection)
b. Qualification and training records of any new management in environmental protection
c. Documentation for any changes to the environmental monitoring program (since the last inspection)
d. Audits/assessments of the Environmental Protection and Effluent Control areas (since the last inspection)
e. Audits/assessments of vendors that supply services for environmental protection, remediation and effluent control (since the last inspection)
f. Corrective action records (whole package) for findings identified in such audits/assessments (since the last inspection)
g. A list of corrective action records for upsets/issues/exceedances/events in the area of environmental protection and effluent control since the last inspection
h. Any other records used to log environmental related events or upsets
i. Environmental protection procedures, including:
    - ENV program procedures;
    - Procedures for updating maps/lists of environmental contamination;
    - Procedures for investigation potential or actual contamination;

- Procedures for changing out/maintaining stack filtration systems, waste water treatment systems, environmental scrubbers, two records of wastewater mixing and sampling tests
- Operational procedures, such as airborne and liquid effluent sample collection, sample analysis, and data collection/reporting;
- Surveillance and calibration procedures for sampling and measurement instrumentation;
- Procedure(s) for adding vendors to approved supplier lists and for auditing those vendors; event reporting procedures (including what needs to be reported internally), etc.

j. 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 any training associated with the change.
k. 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.
l. Documentation that describes and/or defines individual radiological liquid outfalls and any other liquid effluent discharge points and the methods used for collecting samples and/or monitoring radioactive effluent data for those points.
m. Groundwater sampling data produced within the last year
n. The most recent calibration records for all instruments used to analyze radioactive contamination in water sample
o. List of any newly identified subsurface or environmental contamination found since the last inspection (i.e., current treasure map and any updates since the last inspection)
p. Measurement and calculations used evaluate releases, and any trending, and evaluation of trends. Including any releases to municipal sewers.
q. Records of any samples that were cross-checked by independent labs
r. Documents transmitted to local, state, and federal for gaseous/air discharges via stacks, liquid discharges including river discharges, sanitary, and storm water discharges, including: the calculation package used for the “Annual Dose to the Public” including the associated CAP88 or equivalent software used
s. Records and monitoring of buried waste and waste ponds (if applicable). Including any monitoring to determine that buried non-radioactive waste is indeed non-radioactive.
t. ALARA reports for the last year
u. The basis of any alarm setpoints used for monitoring instruments
v. Documentation assessing and/or reassessing flow rates from stacks/gaseous release points
w. The two most recent calibration records for the instrumentation used to monitor the liquid effluent released to the river (including, flow rate instrumentation)

3. Additional Items

a. Please schedule a walkdown of environmental protection equipment and facilities (stacks, liquid effluent samplers, air monitoring stations, etc)
b. A list of IROFS surveillances, tests, calibrations, training, maintenance, modifications and other infrequently performed evolutions scheduled for the week of the inspection. Including, any Fire Brigade training or drills scheduled for the week.
c. List of meetings (day/time) (e.g., plan of the day, shift turnover, PIRCS meeting, maintenance planning)

d. Please schedule a plant tour of BPF for Monday afternoon
e. Please verify the status of BPF the week of the inspection
f. Please schedule a general plant tour for the inspectors in training

PAPERWORK REDUCTION ACT STATEMENT

This letter contains mandatory information collections that are subject to the Paperwork Reduction Act of 1995 (44 U.S.C. 3501 et seq.). The Office of Management and Budget (OMB) approved these information collections (approval number 3150-0009). The burden to the public for these information collections is estimated to average 1 hour(s) per response. Send comments regarding this information collection to the FOIA, Library and Information Collection Branch, Office of the Chief Information Officer, Mail Stop: T6-A10M, U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by e-mail to Infocollects.Resource@nrc.gov, and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202, (3150-0009) Office of Management and Budget, Washington, DC 20503.

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