

Chapter 2 – Organization & Administration

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2.0 ORGANIZATION AND ADMINISTRATION

This chapter describes the management system and administrative procedures for the effective implementation of Health, Safety, and Environmental functions at the Facility. The chapter presents the organizations responsible for managing the design, construction, operation, and decommissioning of the facility. The key management and supervisory positions and functions are described including the personnel qualifications for each key position at the facility.

Orano Enrichment USA LLC (OE) is responsible for maintaining a safe workplace for its employees and ensuring operational compliance within the terms and conditions of the license and applicable regulations.

The Facility organization reflects Orano's experience in operating fuel cycle facilities, including over more than a decade of commercial service at the Georges Besse 2 Enrichment Facility.

Managerial positions that have principal responsibilities important to environmental, health, safety, safeguards, security, and quality for the Facility are described in this chapter.

2.1 ORGANIZATIONAL STRUCTURE

The OE organizational structure is described in the following sections. The organizational structure indicates the lines of communication and management control of activities associated with the engineering, procurement, construction, operation, and decommissioning of the facility.

2.1.1 Corporate Functions, Responsibilities, and Authorities

OE is responsible for the design, quality assurance, construction, operation, and decommissioning of the enrichment facility. The President has overall responsibility for these functions of the Facility.

The Project Director (or equivalent senior manager) and the Quality Assurance (QA) Manager report to the President. The Project Director is accountable for design, construction, and procurement and for initial startup of the Facility. The Project Director will have oversight over the roles described in the following sections.

For matters related to QA, the QA manager has a direct access to the President, as shown in Appendix A of the QAPD.

During the operating phase, OE commits to have the Plant Manager and the Safety Review Committee (SRC) also report to the President to ensure independence.

2.1.2 Engineering, Procurement and Construction Phase Organization

During the Engineering, Procurement and Construction (EPC) phase, the Project Director is responsible for managing the engineering, construction, and procurement activities; a dedicated Construction Director position is not utilized, and these ultimate oversight duties reside with the Project Director.

The Records Management and Document Control is handled by the OE Records Management and Document Control organization. They ensure that correct, approved, and up-to-date procedures, instructions, and drawings are being utilized. Additionally, Record Management will document the evidence that engineering, procurement and construction activities are documented to ensure there is sufficient objective evidence that IROFS will be available and reliable to perform their intended functions.

The Procurement organization is main interface for the commercial terms with the EPC contractor and other suppliers. They work hand-in-hand with the EPC Manager and Project managers assigned to key suppliers. The EPC Manager and Project Managers are responsible for the direct oversight, control, coordination, and communication between OE (as the applicant), the primary EPC vendor, and any engaged construction contractors. This ensures that contractor activities adhere strictly to the design basis and quality requirements.

During the transition from the design phase to the construction phase, the Project Director ensures that the design engineering baselines are formally transferred to the construction organization. This transition is controlled via configuration management measures to ensure that procurement and field construction activities accurately reflect approved design documents.

The Project Director has designated the Environmental, Health, Safety & Licensing (EHS&L) Manager the responsibilities to ensure compliance with licensing commitments, industrial safety, radiation protection, physical security, nuclear material control and accounting (MC&A) and safeguards, nuclear safety and criticality, and emergency preparedness. The EHS&L Manager has the authority to shut down the construction, commissioning, and start-up activities during the EPC phase.

The QA Manager has the responsibilities for independent oversight and implementation of the QAPD. The QA Manager has a direct access to the President.

The lines of communication of key management positions within the engineering, procurement and construction organization are shown in the QAPD.

Position descriptions of key management personnel with EHS&L responsibility in the engineering, procurement and construction organization will be accessible to all affected personnel and the NRC.

2.1.3 Transition from EPC phase to Operations

OE is responsible for the design, quality assurance, construction, testing, initial startup, operation, and decommissioning of the facility.

As portions of the Facility gradually get constructed and commissioned, the focus of the organization will shift from construction, commissioning and start-up to operation of the Facility. OE will staff the Facility operating organization to ensure a smooth transition from construction to operational activities.

As the construction of systems is completed, the systems will undergo acceptance testing as required by procedures, followed by turnover from the construction organization to the operations organization by means of a detailed transition plan. The turnover will include the physical systems and corresponding design information and records. Following turnover, the operating organization will be responsible for system maintenance and configuration management. The design basis for the Facility is maintained during the transition from construction to operations through the configuration management system described in Chapter 11.

2.1.4 Operating Organization

Following the transition from EPC phase to Operations, OE has direct responsibility for operation and maintenance of the Facility.

The President has overall responsibility for the operation of the Facility. He is also responsible for the QA Program. In the discharge of these responsibilities, he directs the activities of the following key personnel:

- Plant Manager
- Safety Review Committee

The Plant Manager reports to the President and is responsible for the operation and maintenance of the Facility. In the discharge of these responsibilities, he directs the activities of the following key personnel:

- Operations Manager
- EHS&L Manager
- QA Manager

The responsibilities, authorities, and lines of communication of key management positions within the operating organization are discussed in Section 2.2, Key Management Positions.

The QA Manager has the authority and responsibility to contact directly the President with any Quality Assurance concerns during operation.

Position descriptions for key management personnel in the operating organization will be accessible to all affected personnel and to the NRC.

2.2 KEY EHS&L AND PLANT OPERATIONS POSITIONS

This section describes the functional positions responsible for managing the operation of the facility. The facility is staffed at sufficient levels prior to operation to allow for training, procedure development, and other pre-operational activities.

The responsibilities, authorities, and lines of communication for each key management position are provided in this section. Responsible managers have the authority to delegate tasks to other individuals; however, the responsible manager retains the ultimate responsibility and accountability for implementing the applicable requirements.

The Corporate Organization and lines of communication are shown in the QAPD.

2.2.1 Operating Organization

The functions and responsibilities of key facility management are described in the following paragraphs.

The minimum qualification requirements for the facility functions that are directly responsible for its safe operation shall be as outlined below.

The nuclear experience of each individual shall be determined to be acceptable by the President. "Responsible nuclear experience" for these positions shall include (a) responsibility for and contributions towards support of facility(ies) in the nuclear fuel cycle (e.g., design, construction, operation, and/or decommissioning), and (b) experience with chemical materials and/or processes.

The actual qualifications of the individuals assigned to the key facility positions will be maintained in the employee personnel files or other appropriate file at the facility.

A. President

The President has overall responsibility for the design, construction, startup, and operation of the Facility. They are also responsible for the QA Program and for determining the status, adequacy, and effectiveness of its implementation.

The assignment of individuals to the Manager positions reporting directly to the President, and to positions on the SRC shall be approved by the President. The President may approve different experience requirements for key positions. Approval of different requirements is done in writing and only on a case-by-case basis.

The President delegates relevant technical tasks to the roles listed below.

B. Plant Manager

The Plant Manager shall be appointed by, and report to the President. The Plant Manager has direct responsibility for operation of the facility in a safe, reliable, and efficient manner. The Plant Manager is responsible for the protection of the facility staff and the general public from radiation and chemical exposure and/or any other consequences of an accident at the facility and also bears the responsibility for compliance with the facility license. The Plant Manager or designee(s) have the authority to approve and issue procedures.

The President shall appoint the Plant Manager as the manager of the Facility. The Plant Manager shall be knowledgeable of the enrichment process, enrichment process controls and ancillary processes, criticality safety control, chemical safety, industrial safety, and radiation protection program concepts as they apply to the overall safety of a nuclear facility.

The Plant Manager shall have, as a minimum, a bachelor's degree (or equivalent) in an engineering or scientific field and ten years of responsible nuclear experience.

C. Quality Assurance Manager

The Quality Assurance Manager is appointed by and reports to the President and has overall responsibility for development, management, implementation, and independent oversight of the QA Program. The Facility managers and their staff who are responsible for performing quality-affecting work are responsible for ensuring implementation of and compliance with the QA Program. The QA Manager position is independent from other management positions at the Facility to ensure the QA Manager has direct access to the President for matters affecting quality.

The Quality Assurance Manager shall have, as a minimum, a bachelor's degree (or equivalent) in an engineering or scientific field and at least six years of responsible nuclear experience in the implementation of a QA program. The QA Manager shall have at least four years of experience in a QA organization at a nuclear facility.

D. Environmental, Health, Safety & Licensing Manager

The Environmental, Health, Safety & Licensing (EHS&L) Manager reports to the Plant Manager and has the overall responsibility for the development and implementation of programs addressing worker health and safety; environmental protection; and licensing and permitting. The EHS&L Manager is also responsible for maintaining compliance with safeguards; appropriate rules, regulations, and codes. This includes EHS&L activities associated with nuclear criticality safety, radiation protection, chemical safety, fire protection, environmental protection, emergency preparedness, industrial safety, and development and implementation of security programs for nuclear material control and accountability, physical protection of the facility, and protection of classified matter. The EHS&L Manager works with the other facility managers to ensure consistent interpretations of EHS&L requirements, performs independent reviews, and supports facility and operations change control reviews.

This position is independent from other operations management positions at the facility to ensure objective EHS&L audit, review, and control activities. The EHS&L Manager has the authority to order the shutdown of operations if they appear to be unsafe or non-compliant with applicable regulatory requirements and must consult with the Plant Manager with respect to restart of shutdown operations after the deficiency, or unsatisfactory condition, has been resolved.

The EHS&L Manager shall have, as a minimum, a bachelor's degree (or equivalent) in an engineering or scientific field and at least five years of responsible nuclear experience in EHS&L or related disciplines. The EHS&L Manager shall also have at least one year of direct experience in the administration of nuclear criticality safety evaluations and analyses.

E. Operations Manager

The Operations Manager reports to the Plant Manager and has the responsibility of directing the day-to-day operation of the Facility. Inherent in this responsibility is the assurance that the operations are conducted safely and in compliance with license conditions. This includes such activities as ensuring the correct and safe operation of Uranium Hexafluoride (UF₆) processes, proper handling of UF₆, and the identification and mitigation of any off normal operating conditions. The Operations Manager is also responsible for the plant maintenance function, which includes activities to ensure that Items Relied on for Safety (IROFS) are reliable and available when needed. In the event of the absence of the Plant Manager, the Operations Manager may assume the responsibilities and authorities of the Plant Manager.

The Operations Manager shall have, as a minimum, a bachelor's degree (or equivalent) in an engineering or scientific field and four years of responsible nuclear experience.

F. Nuclear Criticality Safety Program Manager

The Nuclear Criticality Safety Program Manager reports to the EHS&L Manager and is responsible for the development and implementation of the nuclear criticality safety program. Key responsibilities include the performance of nuclear criticality safety analyses and evaluations of applicable operations involving special nuclear material and changes to those operations; establishing limits and controls based on those analyses and evaluations; ensuring the proper incorporation of limits and controls into applicable procedures and instructions; and monitoring plant compliance with nuclear criticality safety requirements.

The Nuclear Criticality Safety Program Manager shall have, as a minimum, a bachelor's degree (or equivalent) in an engineering or scientific field and four years of responsible nuclear experience related to nuclear safety and criticality. The Nuclear Criticality Safety Program Manager shall also have at least one year of direct experience in the administration of nuclear criticality safety evaluations and analyses. No credit for academic training may be taken toward fulfilling this experience requirement.

G. Industrial Safety & Radiation Protection Manager

The Industrial Safety & Radiation Protection Manager reports to the EHS&L Manager and has the responsibility for developing and implementing programs related to industrial hygiene and safety, chemical safety, fire protection, and radiation protection (including the As Low as Reasonably Achievable (ALARA) program). The radiation protection duties include the training of personnel in use of equipment, control of radiation exposure of personnel, continuous determination of the radiological status of the facility, and conducting the radiological environmental monitoring program.

During emergency conditions the Industrial Safety & Radiation Protection Manager's duties may also include:

- Providing Emergency Operations Center personnel information and recommendations concerning chemical and radiation levels at the facility
- Gathering and compiling onsite and offsite radiological and chemical monitoring data
- Making recommendations concerning actions at the facility and offsite deemed necessary for limiting exposures to facility personnel and members of the general public

- Taking prime responsibility for decontamination activities.

The Industrial Safety and Radiation Protection Manager shall have, as a minimum, a bachelor's degree (or equivalent) in an engineering or scientific field and four years of responsible nuclear experience.

H. Emergency Preparedness Manager

The Emergency Preparedness Manager reports to the EHS&L Manager. The Emergency Preparedness Manager is responsible for implementation and maintenance of the emergency preparedness including the responsibility for ensuring the Facility remains prepared to react and respond to any emergency situation that may arise, as well as coordination with Physical Security Manager and MC&A and Safeguards Manager to prevent unauthorized access to classified matter and prevent the theft of nuclear material during any emergency situation. This includes emergency preparedness training of facility personnel, facility support personnel, the training of, and coordination with, offsite emergency response organizations (EROs), and conducting periodic drills to ensure facility personnel and offsite response organization personnel training is maintained up to date.

The Emergency Preparedness Manager shall have as a minimum, a bachelor's degree in an engineering or scientific field, and five years of experience in the responsible management of emergency preparedness at a facility requiring capability similar to that required for the facility.

I. Licensing and Compliance Manager

The Licensing and Compliance Manager reports to the EHS&L Manager. The Licensing and Compliance Manager is responsible for regulatory oversight functions, regulatory and environmental compliance, facility change process, and commitment management. The Licensing and Compliance Manager is also responsible for ensuring abnormal events are reported to the NRC in accordance with NRC regulations.

The Licensing and Compliance Manager shall have, as a minimum, a bachelor's degree (or equivalent) in an engineering or scientific field and four years of responsible nuclear experience.

J. MC&A and Safeguards Manager

The MC&A and Safeguards Manager reports to the EHS&L Manager and has the responsibility for ensuring the proper implementation of the Fundamental Nuclear Material Control (FNMC) Plan. This position is separate from and independent of other departments to ensure a definite division between the safeguards group and the other departments.

The MC&A and Safeguards Manager shall have as a minimum, a bachelor's degree in an engineering or scientific field, and five years of experience in the management of a safeguards program for Special Nuclear Material, including responsibilities for material control and accounting.

K. Physical Security Manager

The Physical Security Manager reports to the EHS&L Manager.

The Physical Security Manager is responsible for the implementation of the Physical Security Plan, the Standard Practice Procedures Plan and managing the physical security services.

The Physical Security Manager has, as a minimum, a bachelor's degree or equivalent technical experience, and four years' security experience.

2.2.2 Safety Review Committee

The Facility maintains an SRC to assist with the safe operation of the facility. The SRC shall report to the President and shall provide technical and administrative review and audit of operations that could impact plant worker, public safety, and environmental impacts. The scope of activities reviewed and audited by the SRC shall, as a minimum, include the following:

- Radiation protection
- Nuclear criticality safety
- Hazardous chemical safety
- Industrial safety including fire protection
- Environmental protection
- ALARA policy implementation
- Changes in facility design or operations.

The SRC shall be composed of at least five members, including the Chairman. Members of the SRC may be from the OE corporate or technical staff. The five members shall include experts on operations and all safety disciplines mentioned above. The Chairman, members and alternate members of the Safety Review Committee shall be formally appointed by the President, shall have an academic degree in an engineering or physical science field; and, in addition, shall have a minimum of five years of technical experience, of which a minimum of three years shall relate directly to one or more of the safety disciplines.

The SRC shall meet at least once per calendar quarter and shall conduct at least one facility audit per year for the above areas.

Review meetings shall be held within 30 days of any incident that is reportable to the NRC. These meetings may be combined with regular meetings. Following a reportable incident, the SRC shall review the incident's causes, the responses, and both specific and generic corrective actions to ensure resolution of the problem is implemented.

A written report of each SRC meeting and audit shall be forwarded to the President, the Plant Manager, and other appropriate Managers within 30 days and be retained in accordance with the records management system.

2.3 ADMINISTRATION

OE has established management measures to ensure safe operations of the Facility, detailed in Chapter 11. Specifically, as it relates Organization and Administration, this section summarizes how:

- The formal management measures required to ensure the availability and reliability of IROFS are established
- The activities essential for effective implementation of the EHS&L functions are documented in formally approved, written procedures, prepared in compliance with the QA Program
- The mechanism for reporting potentially unsafe conditions or activities to the EHS&L organization and facility management is documented and implemented

- Written agreements are established with offsite emergency resources such as fire, police, ambulance and rescue units, and medical services.

2.3.1 Configuration Management

Configuration management is provided for IROFS throughout facility design, construction, testing, and operation. Configuration management provides the means to establish and maintain a technical baseline for the facility based on clearly defined requirements. The responsibility for implementing the configuration management program falls under the Plant Manager.

Additional details on Configuration Management are provided in Chapter 11.

2.3.2 Maintenance

The maintenance program will be implemented for the operations phase of the Facility. Preventive maintenance activities, surveillance, and performance trending provide reasonable and continuing assurance that IROFS will be available and reliable to perform their safety functions. The responsibility for implementing the maintenance program falls under the Operations Manager.

The maintenance program is discussed in detail in Chapter 11.

2.3.3 Training and Qualifications

Formal planned training programs shall be established for Facility employees.

The training programs and maintenance of the training program records at the facility are the responsibility of the Operations Manager. Accurate records are maintained on each employee's qualifications, experience, training, and retraining.

Additional details on the Facility training program are provided in Chapter 11.

2.3.4 Procedures

Activities involving licensed materials will be conducted through the use of approved, written procedures. Applicable procedure and training requirements will be satisfied before use of the procedure. Procedures will be used to control activities in order to ensure the activities are carried out in a safe manner.

Chapter 11 details the use of procedures, including development, revision, and distribution and control.

2.3.5 Audits and Assessments

The QA Program requires periodic audits to confirm that activities affecting quality comply with the QA Program and that the QA Program is being implemented effectively. The assessment function includes audits and other independent assessments to verify performance. These assessments provide a comprehensive independent evaluation of activities, including activities delegated to others under the QA Program, and procedures. Personnel who do not have direct responsibility in the area being assessed conduct these assessments.

Additional details on audits and assessments are provided in Chapter 11.

2.3.5.1 Safety Review Committee

The SRC provides technical and administrative review of facility operations that could impact plant worker and public safety. Details on the SRC and the scope of activities reviewed by the SRC are provided in Section 2.2.3.

2.3.5.2 Quality Assurance Department

The QA Department conducts periodic audits of activities associated with the facility, in order to verify the facility's compliance with established procedures. Audits are conducted in accordance with the QA Program Description and as required by Chapter 11.

2.3.5.3 Facility Operating Organization

The facility operating organization shall provide, as part of the normal duties of supervisory personnel, timely and continuing monitoring of operating activities to assist the Plant Manager in keeping abreast of general facility conditions and to verify that the day-to-day operating activities are conducted safely and in accordance with applicable administrative controls.

These continuing monitoring activities are considered to be an integral part of the routine supervisory function and are important to the safety of the facility operation.

2.3.5.4 Audited Organizations

Audited organizations shall assure that deficiencies identified are corrected in a timely manner.

Audited organizations shall transmit a response to each audit report within the time period specified in the audit. For each identified deficiency, the response shall identify the corrective action taken or to be taken. For each identified deficiency, the response shall also address whether or not the deficiency is considered to be indicative of other problems (e.g., a specific audit finding may indicate a generic problem) and the corrective action taken or to be taken for any such problems determined.

Copies of audit reports and responses are maintained in accordance with the records management system.

2.3.6 Incident Investigations

Abnormal events that potentially threaten or lessen the effectiveness of health, safety, or environmental protection are identified and reported to the EHS&L Manager or designee through the Corrective Action Program (CAP) which is described in more detail in Chapter 11.

The EHS&L Manager or designee shall, through implementation of the CAP, maintain a record of corrective actions to be implemented as a result of off-normal investigations. These corrective actions shall include documenting lessons learned, and implementing worker training where indicated, and shall be tracked to completion by the EHS&L Manager or designee within the CAP.

All employees have the responsibility to initiate a corrective action should incidents or deficiencies be identified. The QA team will utilize the CAP to determine any root causes or corrective actions required to preclude recurrence for significant conditions adverse to quality.

Additional details on incident investigations are provided in Chapter 11 and QAPD Section 16.

2.3.7 Employee Concerns

Employees who feel that safety or quality is being compromised have the right and responsibility to initiate the “stop work” process in accordance with the applicable project or facility procedures to ensure the work environment is placed in a safe condition.

Employees also have access to various resources to ensure their safety or quality concerns are addressed, including:

- line management or other facility management (e.g., EHS&L Manager, Plant Manager, QA Manager)
- the Facility safety organization (i.e., any of the safety engineers or managers)
- NRC’s requirements under 10 CFR 19, Notices, Instructions and Reports to Workers: Inspection and Investigations
- OE CAP - a simple mechanism available for use by any person at the Facility site for reporting unusual events and potentially unsafe conditions or activities.

2.3.8 Records Management

Procedures are established which control the preparation and issuance of documents such as manuals, instructions, drawings, procedures, specifications, and supplier-supplied documents, including any changes thereto. Measures are established to ensure documents, including revisions, are adequately reviewed, approved, and released for use by authorized personnel.

Document control procedures require documents to be transmitted and received in a timely manner at appropriate locations including the location where the prescribed activity is to be performed. Controlled copies of these documents and their revisions are distributed to and used by the persons performing the activity.

Superseded documents are destroyed or are retained only when they have been properly labeled. Indexes of current documents are maintained and controlled.

The QA Program assigns responsibility for verifying QA record retention to the QA Manager. Applicable design specifications, procurement documents, or other documents specify the QA records to be generated by, supplied to, or held, in accordance with approved procedures. QA records are not considered valid until they are authenticated and dated by authorized personnel.

Additional details on records management are provided in Chapter 11.

2.3.9 Written Agreements with Offsite Emergency Resources

The plans for coping with emergencies at the Facility are presented in detail in the Emergency Plan. The Emergency Plan includes a description of the facility emergency response organization (ERO) and interfaces with off-site EROs. Local fire, police, and ambulance services (City of Oak Ridge, Roane County) are required by Tennessee state law to respond to emergencies when 911 is called. Where letters of agreement are not in place, such as local police or fire responders, the use of the 911 system ensures a response to incidents at the facility.

More details are provided in Chapter 8 and in the Facility Emergency Plan.