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NUCLEAR REGULATORY COMMISSION
REGION II
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ATLANTA, GEORGIA 30303-8931**

October 31, 2000

Framatome Cogema Fuels
ATTN: Mr. J. E. Matheson
Plant Manager
Lynchburg Manufacturing Facility
P. O. Box 11646
Lynchburg, VA 24506-1646

SUBJECT: NRC INSPECTION REPORT NO. 70-1201/2000-05

Dear Mr. Matheson:

This refers to the inspection conducted on October 16-20, 2000, at the Lynchburg Manufacturing Facility (LMF). The enclosed report presents the results of this inspection.

During the inspection period, your conduct of activities at the LMF was generally characterized by safety-conscious operations, sound engineering and maintenance practices, and careful radiological work controls.

Within the scope of the inspection, violations or deviations were not identified.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/NRC/ADAMS.index.html> (the Public Electronic Reading Room).

Should you have any questions concerning this letter, please contact us.

Sincerely,

/RA/

Edward J. McAlpine, Chief
Fuel Facilities Branch
Division of Nuclear Materials Safety

Docket No. 70-1201
License No. SNM-1168

Enclosure: NRC Inspection Report

cc w/encl: (See Page 2)

cc w/encl:

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U. S. NUCLEAR REGULATORY COMMISSION

REGION II

Docket No.: 70-1201

License No.: SNM-1168

Report No.: 70-1201/2000-05

Licensee: Framatome Cogema Fuels, Inc.

Facility: Lynchburg Manufacturing Facility

Location: Lynchburg, VA

Dates: October 16-20, 2000

Inspector: A. Gooden, Health Physicist

Approved by: E. McAlpine, Chief
Fuel Facilities Branch
Division of Nuclear Materials Safety

Enclosure

EXECUTIVE SUMMARY

Framatome Cogema Fuels
NRC Inspection Report No. 70-1201/2000-05

This routine unannounced inspection involved observation of work activities, a review of selected records, and interviews with plant personnel pertaining to transportation and the emergency response program. The report entails one week of inspection effort by a regional-based fuel facility inspector.

Transportation

- Activities associated with the packaging, classification, and vehicle inspection for transport of radioactive material promoted safety of the workers, carriers, and the public. The procedures provided adequate guidance and instructions to ensure that the material was properly packaged, labeled, and surveyed in accordance with the requirements in 10 CFR Part 71 and 49 CFR Part 172 (Paragraph 2.a).
- A program was in place to ensure the safe unloading and opening of packages containing radioactive material. Procedures provided guidance and instructions to ensure that the requirements in 10 CFR 20.1906 were appropriately implemented governing surveys, contamination limits, and NRC reporting requirements (Paragraph 2.b).
- A current Certificate of Compliance (CoC) was on file for each of the containers currently in use (Paragraph 2.c).

Emergency Preparedness (EP)

- Procedural changes since the last inspection did not impact the effectiveness of the emergency preparedness program. However, recent organization changes reduced emergency organization staffing levels (Paragraph 3.a).
- EP procedures provided guidance for maintaining a response capability (Paragraph 3.b).
- Lack of management oversight to emergency response training resulted in four members of the emergency organization with expired training (Paragraph 3.c).
- The licensee's emergency response equipment was maintained in a state of readiness (Paragraph 3.d).

Attachment:

Persons Contacted and Exit Interview
List of Items Opened, Closed, and Discussed
List of Acronyms

REPORT DETAILS

1. Summary of Plant Status

During the assessment period, normal plant operations, and typical activities for the service equipment refurbishment facilities (SERF) were ongoing. Preparations for relocating the fuel assembly storage area continued.

2. Transportation (86740) (R4)

a. Preparation of Packages for Shipment (R4.01, R4.02)

(1) Inspection Scope

Transportation activities associated with the packaging and shipment of radioactive material were reviewed, to verify that activities were in accordance with NRC and the Department of Transportation (DOT) regulations in 10 CFR Part 71 and 49 CFR Parts 171 -180.

(2) Observations and Findings

The inspector reviewed procedures and observed the licensee's performance in container preparation, markings, and vehicle loading for a limited quantity shipment involving the SERF. Based on inspector observations and the review of shipping papers, the appropriate container labeling/markings, radiation and contamination surveys, and communications information specific to the material were applied. Shipping papers included the appropriate emergency response information including a twenty-four-hour emergency response telephone number as required by 49 CFR Part 172.

Randomly selected shipping documentation covering the period January to October 2000, was reviewed for a variety of shipments (fuel assemblies, SERF equipment, fuel pellets, and empty containers). No problems were noted with the selected documentation.

(3) Conclusions

Activities associated with the packaging, classification, and vehicle inspection for transport of radioactive material promoted safety of the workers, carriers, and the public. The procedures provided adequate guidance and instructions to ensure that the material was properly packaged, labeled, and surveyed in accordance with the requirements in 10 CFR Part 71 and 49 CFR Part 172.

b. Receipt of Packages (R4.03)

(1) Inspection Scope

Transportation activities associated with the receipt of packages containing radioactive material were reviewed to verify that procedures were in place, and activities were conducted in accordance with 10 CFR 20.1906.

(2) Observations and Findings

The inspector reviewed the applicable procedures governing the receipt of radioactive material and fuel pellets, and examined shipping papers for pellets receipt shipments during the first quarter of 2000. Based on the review of shipping papers, the appropriate container labeling/markings, radiation and contamination surveys, and communications information specific to the material were applied. Included with shipping documentation were instructions for the safe opening of packages. The procedures provided sufficient details to ensure that the requirements in 10 CFR 20.1906 were appropriately addressed.

(3) Conclusions

A program was in place to ensure the safe unloading and opening of packages containing radioactive material. Procedures provided guidance and instructions to ensure that the requirements in 10 CFR 20.1906 were appropriately implemented governing surveys, contamination limits, and NRC reporting requirements.

c. Certificates of Compliance (R4.04)(1) Inspection Scope

The inspector reviewed the licensee's Certificates of Compliance (CoCs) to verify that they were maintained current and complied with requirements in 10 CFR Part 71.

(2) Observations and Findings

The inspector reviewed documentation for three shipping containers used to transport material during the calendar year, and determined that each shipping container's CoC was current. The transportation procedure's checklist required container maintenance and pre-load inspection prior to use of the Model B container for shipping fuel assemblies.

(3) Conclusions

Based on interviews and documentation, a current CoC was on file for each of the containers currently in use.

3. **Emergency Preparedness(88050) (F3)**a. Review of Program Changes (F3.01)(1) Inspection Scope

Changes to the emergency response program since the last inspection were reviewed to determine their impact on the effectiveness of the program, and to verify that procedural changes were reviewed and approved by plant management.

(2) Observations and Findings

Since the last inspection, changes to the normal organization resulted in the reassignment of the emergency preparedness management reporting chain. Day to day responsibility for program maintenance did not change, hence no impact was anticipated on program effectiveness. However, emergency organization staffing was impacted by recent organization changes (reassignment/retirement) that resulted in the loss of personnel and vacancies for the positions of the primary for the Health Safety Officer and/or alternate for the Administrative and Muster Area Officer. The licensee was aware of this matter and indicated that actions were planned to resolve the staffing levels.

Regarding equipment and facilities, no changes were made since the last inspection. Changes were made to implementing procedures, but they did not appear to impact the effectiveness of emergency planning.

(3) Conclusions

Based on interviews and a review of documentation, procedural changes since the last inspection did not impact the effectiveness of the emergency preparedness program. However, recent organization changes reduced the emergency organization staffing levels.

b. Implementing Procedures (F3.02)

(1) Inspection Scope

The inspector reviewed licensee procedures governing the implementation of the emergency response program to ensure that procedures provided guidance for maintaining a response capability, and were periodically reviewed and updated.

(2) Observations and Findings

By letter dated April 6, 1994, the NRC granted the licensee an exemption from maintaining an NRC approved Plan, but the licensee committed to maintaining an emergency response organization, Plan, and implementing procedures. In lieu of an Emergency Plan, Procedure SL-1308 and addendums to SL-1308 describe the actions taken in response to an emergency.

Procedures provided guidance for equipment maintenance, training, and other program aspects to show that an emergency response capability was maintained. In addition, Emergency Procedure SL-1308 described the actions to be taken in the event of a plant emergency. The inspector determined that the licensee was periodically reviewing and updating procedures as evidenced by the January 2000 update to the Emergency Team/Support Personnel Phone List, and revisions to SL-1308 dated March 2000.

(3) Conclusions

Based on interviews and the review of documentation, the inspector determined that procedures provided guidance for maintaining a response capability. The previous inspector followup item (IFI 2000-01-01) regarding SL-1308 procedural inadequacies, was considered closed due to lack of guidance for emergency planning at facilities not required to maintain an NRC approved Plan.

c. Training and Staffing of Emergency Organization (F3.03)

(1) Inspection Scope

Emergency response training was reviewed to determine if the licensee provided training to response personnel in accordance with procedures.

(2) Observations and Findings

The inspector requested training documentation for randomly selected individuals assigned to the current Emergency Team Roster to verify that training was up-to-date. Several individuals were identified by the inspector as requiring retraining. In response, the licensee took immediate actions to retrain or remove the individual(s) from the emergency organization roster. The licensee acknowledged that the expired training resulted from lack of oversight for tracking the status of training. To prevent a recurrence, the licensee indicated that oversight responsibility would be assigned for periodic review to ensure training was current. The inspector concluded that the licensee's actions were timely and appropriate to ensure that an emergency organization staffed with trained personnel was maintained. The lack of a requirement for an NRC approved Plan resulted in the determination that no violation of emergency response training was identified.

Recent organization changes (discussed above) resulted in a reduction to the emergency organization staffing levels. Positions remained vacant at the time of the inspection.

(3) Conclusions

Lack of management oversight to emergency response training resulted in four members of the emergency organization with expired training.

d. Emergency Equipment and Facilities (F3.06)

(1) Inspection Scope

The Emergency Operations Facility (EOF) and equipment were inspected to determine whether the facility, emergency response equipment, instrumentation, and supplies were maintained in a state of operational readiness.

(2) Observations and Findings

The EOF and equipment were checked for operational readiness and operability. No problems were noted. According to surveillance documentation covering the period January 1, 1999 to October 1, 2000, the criticality monitoring system was functionally tested in accordance with procedures. In addition, emergency equipment (radiation survey instruments, respiratory protection equipment, etc.) and supplies were inventoried and checked in accordance with procedures.

(3) Conclusions

Based on the facility tour and equipment functionality tests, the inspector concluded that the licensee's emergency response equipment was maintained in a state of readiness.

e. Followup On Previously Identified Issues (F3.07)

(1) Inspection Scope

The inspector reviewed the actions taken by the licensee to correct previous issues to verify that the corrective actions were adequate and had been completed.

(2) Observations and Findings

The following items were reviewed:

- (Closed) IFI 70-1201/2000-01-01: Verify the corrective actions to resolve Procedure SL-1308 inadequacies. Previous aspects of Procedure SL-1308 considered inadequate were redressed in light of the lack of planning guidance for low risk facilities not required to have an NRC approved Emergency Plan. The IFI was considered closed pending guidance for facilities not required to maintain an NRC approved Plan.
- (Closed) IFI 70-1201/2000-01-02: Review and verify that key elements of the emergency response program are tested periodically. A tabletop drill was conducted on July 19, 2000. According to documentation and interviews, the drill included a demonstration of key elements previously not demonstrated during drills (emergency classification, protective actions). Based on the drill this item is closed.
- (Closed) IFI 70-1201/2000-01-03: Verify adequate implementation of the Emergency Team Action Item Tracking Register. The inspector reviewed documentation to show that items were being tracked via the Corrective/Preventive Action Report (CAR) system for followup to ensure corrective actions were completed and effective.

(3) Conclusions

The inspector considered each of the items closed.

f. Information Notices (IN)

(1) Inspection Scope

The inspector reviewed the following INs to determine if the information had been received by the licensee:

IN 2000-07: National Institute for Occupational Safety and Health Respirator User Notice: Special Precautions for Using Certain Self-Contained Breathing Apparatus Air Cylinders

IN 2000-12: Potential Degradation of Firefighter Primary Protective Garments

(2) Observations and Findings

The licensee reviewed the details and determined that the existing site equipment and protective garments were not affected and no further action was required.

(3) Conclusions

The licensee's actions were appropriate.

4. **Exit Interview**

The inspection scope and results were summarized on October 20, 2000 with those persons indicated in the Attachment. Although proprietary documents were occasionally reviewed during this inspection, the proprietary nature of these documents have been deleted from this report. No dissenting comments were received from the licensee.

ATTACHMENT

INSPECTION PROCEDURES USED

IP 86740 Transportation
IP 88050 Emergency Preparedness

LIST OF PERSONS CONTACTED

Licensee

T. Allsep, Manager, Radiation Protection
*D. Driscoll, Senior Regulatory Compliance Officer and Emergency Officer
*R. Freeman, Manager, Licensing and Nuclear Material Control and Accounting
*G. Lindsey, Health Physicist
*J. Matheson, Plant Manager

Other licensee employees contacted included engineers, technicians, production workers, security, and office personnel.

*Attended exit meeting on October 20, 2000

LIST OF ITEMS OPENED AND CLOSED

<u>Item Number</u>	<u>Status</u>	<u>Description</u>
70-1201/2000-01-01	Closed	IFI - Verify the corrective actions to resolve Procedure SL-1308 inadequacies (Paragraph 3.e).
70-1201/2000-01-02	Closed	IFI - Review and verify that key elements of the emergency response program are tested periodically (Paragraph 3.e).
70-1201/2000-01-03	Closed	IFI - Verify adequate implementation of the Emergency Team Action Item Tracking Register (Paragraph 3.e).

LIST OF ACRONYMS USED

CAR	Corrective Action Report
CFR	Code of Federal Regulations
CoCs	Certificates of Compliance
DOT	Department of Transportation
EOF	Emergency Operations Facility
IFI	Inspector Followup Item
IN	Information Notice
IP	Inspection Procedure
LMF	Lynchburg Manufacturing Facility
NRC	Nuclear Regulatory Commission
SERF	Service Equipment Refurbishment Facility

