



**UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
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61 FORSYTH STREET SW SUITE 23T85
ATLANTA, GEORGIA 30303-8931**

September 27, 2002

NMED No. 010718

EA-02-045

Westinghouse Electric Company
ATTN: Mr. M. Fecteau, Manager
Columbia Plant
Commercial Nuclear Fuel Division
Drawer R
Columbia, SC 29250

SUBJECT: NRC INSPECTION REPORT NO. 70-1151/2002-007

Dear Mr. Fecteau:

This letter refers to the inspection conducted on August 26-29, 2002, at the Columbia Plant. The purpose of the inspection was to determine whether activities authorized by the license were conducted safely and in accordance with NRC requirements. At the conclusion of the inspection, the findings were discussed with those members of your staff identified in the enclosed report.

Areas examined during the inspection are identified in the report. Within these areas, the inspection consisted of selective examinations of procedures and representative records, interviews with personnel, and observation of activities in progress.

Based on the results of the inspection, violations or deviations were not identified.

In accordance with 10 CFR 2.790 of NRC's "Rules of Practice," a copy of this letter and its enclosure will be available electronically for public inspection in NRC's 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/reading-rm/ADAMS.html> (the Public Electronic Reading Room).

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

Sincerely,

/RA/

David A. Ayres, Chief
Fuel Facilities Branch
Division of Nuclear Materials Safety

Docket No. 70-1151
License No. SNM-1107

Enclosure: NRC Inspection Report

cc w/encl:
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Environment, Health and Safety
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U.S. NUCLEAR REGULATORY COMMISSION

REGION II

Docket No.: 70-1151

License No.: SNM-1107

Report No.: 70-1151/2002-07

Licensee: Westinghouse Electric Company

Facility: Columbia Fuel Fabrication Facility
Columbia, SC 29250

Date: August 26-29, 2002

Inspector: W. B. Gloersen, Senior Fuel Facilities Inspector

Accompanying
Personnel: N. Rivera, Fuel Facility Inspector (In Training)

Approved by: D. A. Ayres, Chief
Fuel Facilities Branch
Division of Nuclear Materials Safety

Enclosure

EXECUTIVE SUMMARY

Commercial Nuclear Fuel Division NRC Inspection Report 70-1151/2002-07

The focus of this routine, unannounced inspection was the observation and evaluation of the licensee's programs for transportation of radioactive materials, radioactive solid waste management, and fire protection. The inspection identified the following aspects of the licensee programs as outlined below:

Fire Protection

- Overall, fire safety equipment in the facility was in good condition and adequately maintained. However, maintenance issues were noted with the fire extinguishers located in the uranyl nitrate crystal receiving bay area UF₆ vaporization area. Specifically, a fire extinguisher was missing; two fire extinguishers were out of date and needed replacement; and an inspection tag was missing from one fire extinguisher (Paragraph 1.a).
- Other than minor inconsistencies, the fire hazard analyses and integrated safety analyses were adequate (Paragraph 1.b).

Transportation

- There were no changes to the shipping and transportation organization. Managers, technical, and engineering staff were not assigned collateral duties in other departments (Paragraph 3.a).
- The licensee appropriately entered an audit deficiency into their corrective action program system. The deficiency involved the lack of a systematic and comprehensive audit of the shipping and transportation program. Although lesser audits had been performed, a systematic and comprehensive audit had not been conducted since the reorganization of the transportation function in 2000, due to the inappropriate revision of the procedure system and audit structure (Paragraph 3.b).
- The hazardous materials training program was acceptable. Shipping function-specific training was provided to the appropriate individuals in accordance with the requirements specified in 49 CFR 172.704 (Paragraph 3.c).
- Acceptable management approved procedures were available to ensure that the fuel shipping packages would be safely loaded and in accordance with the NRC Certificate of Compliance (Paragraph 3.d).
- The procedures associated with the refurbishment of the fuel assembly shipping containers were acceptable and the maintenance activities were conducted safely in a work area that was clean and orderly (Paragraph 3.e).

- The Certificate of Compliance for the NRC approved shipping containers used to ship radioactive materials was maintained in a well-organized manner. Shipping records for radioactive material shipments were complete and the information supplied on the shipping papers was accurate (Paragraph 3.f).
- The licensee performed an adequate review of a reduction in package effectiveness issue. While an accident scenario involving the failure of a uranium hexafluoride cylinder valve was considered important to safety, the licensee concluded that this type of event would not create a substantial safety hazard (Paragraph 3.g).
- An apparent violation (AV 70-1151/2002-03-01) for failure to follow chemical operating procedures was identified in inspection report number 70-1151/2002-03. This apparent violation has been dispositioned by the NRC as a Severity Level III problem with six violations of NRC requirements, as discussed in NRC letter titled, "Notice of Violation (NRC Inspection Report 70-1151/ 2002-03 and U.S. Nuclear Regulator Commission Office of Investigations Case Number 2-2001-022)," dated May 29, 2002. Based on this disposition, AV 70-1151/2002-03-01 is closed (Paragraph 3.h).
- The uranyl nitrate crystal package receipt, opening, material transfer, and container survey process was conducted efficiently, safely, and in accordance with established procedures. The management oversight of the radioactive material receipt process has greatly improved (Paragraph 3.h).

Radioactive Solid Waste Management

- The waste shipping manifests were complete and provided an acceptable level of information in the shipping papers to determine the quantities of individual radionuclides shipped. The licensee's waste shipping tracking records were complete and organized (Paragraph 4.a).

Attachment:

Persons Contacted

Lists of Items Opened, Closed, and Discussed

List of Acronyms

REPORT DETAILS

1. Summary of Plant Status

This report covered a four-day period. The conversion lines were operating near normal capacity. Pellet and fuel assembly production remained near capacity during the week.

2. Fire Protection (Inspection Procedure (IP) 88055)

a. Fire Safety of Processes, Equipment, and Storage Areas

(1) Inspection Scope

The inspectors reviewed the processes, equipment, and storage areas to determine if the licensee was operating the facility in a fire-safe manner.

(2) Observations and Findings

The inspectors toured the storage area and noted that it was in excellent condition. Also, the inspectors observed that there were no significant accumulations of combustible materials. The inspectors observed the operation of the sintering furnaces and noted that they were operating properly and adequately controlled.

The equipment throughout the facility was in good condition and clear of debris. It was noted that a fire extinguisher in the uranyl nitrate (UNH) crystal receiving bay area was missing. There were also two fire extinguishers out of date and needing replacement. One fire extinguisher was identified by licensee security personnel and the other was identified by the inspectors during a tour. All of the remaining fire extinguishers in the UNH crystal receiving bay were properly tagged and in good condition. In the UF₆ vaporization area, another fire extinguisher was in good condition, but it did not have its tag. These issues were brought to the attention of the licensee. The licensee took appropriate actions by initiating work orders to correct these issues and by discussing the fire equipment inspection process with the individuals responsible for performing those inspections.

(3) Conclusion

Overall, the fire safety equipment in the facility was in good condition and adequately maintained. However, maintenance issues were noted with the fire extinguishers in the uranyl nitrate crystal receiving bay area and UF₆ vaporization area. Specifically, a fire extinguisher was missing; two fire extinguishers were out of date and needed to be replaced; and an inspection tag was missing from one fire extinguisher.

b. Fire Hazard Analysis

(1) Inspection Scope

The inspectors reviewed the Fire Hazard Analysis (FHA) and selected sections of the Integrated Safety Analysis (ISA).

(2) Observations and Findings

The inspectors reviewed the FHAs and ISA, and other than minor inconsistencies no problems were identified. The inspectors noted that the licensee was reviewing the pre-fire plan and correcting inconsistencies as they identified them.

(3) Conclusion

Other than minor inconsistencies, the FHAs and ISA were adequate.

3. Transportation (IP 86740)

The inspectors reviewed the licensee's program for the shipment of radioactive materials, to determine whether the licensee had established and was maintaining an effective management-controlled program, to ensure radiological and nuclear safety in the receipt, packaging, delivery to a carrier of licensed radioactive materials, and to determine whether transportation activities were in compliance with the applicable NRC and Department of Transportation (DOT) transport regulations noted below. During the inspection, transportation and radiation protection activities associated with fissile material shipments, including procedural guidance, quality control activities, record completeness, and radiation surveys conducted in accordance with 10 CFR Parts 20 and 71, and 49 CFR Parts 171-178, were reviewed.

a. Organizational Structure

(1) Inspection Scope

The inspectors examined the licensee's organizational structure for the radioactive materials shipment program. Specifically, the inspectors reviewed any organizational changes and changes in personnel responsibilities and functions that occurred since the last inspection.

(2) Observations and Findings

The inspectors noted that there were no significant changes to the organizational structure since the last inspection of the shipping and transportation program. The organization included engineers and technical staff that did not have collateral duties in other departments. The licensing and logistical function, which included nuclear criticality safety and container design management, of the shipping program reported directly to the Nuclear Fuel Transport Manager of British Nuclear Fuels Limited (BNFL). The Nuclear Fuel Transport Manager for Columbia Operations also reported to the BNFL Nuclear Fuel Transport Manager. Shipping, receiving, hazardous materials, and container engineering reported to the Nuclear Fuel Transport Manager for Columbia Operations.

The solid waste management function reported directly to the Chemical Process Engineering Manager, who in turn reported to the Technical Services Manager.

(3) Conclusion

There were no changes to the shipping and transportation organization. Managers, technical, and engineering staff were not assigned collateral duties in other departments.

b. Internal Reviews, Audits, and Self Assessments

(1) Inspection Scope

The inspectors examined the licensee's periodic programmatic audits established by the licensee to ensure that they were meeting the requirements of 10 CFR 71.137.

(2) Observations and Findings

The inspectors noted that a comprehensive system to assure that planned and periodic audits of the shipping and transportation program would be conducted was lacking. This weakness was noted during discussions with the licensee regarding the audit program. During those discussions, the licensee identified that during the reorganization of the Transportation function in 2000, the procedure system and audit structure was not revised appropriately. Consequently, a systematic and comprehensive audit of the shipping and transportation program had not been conducted since the reorganization. The inspectors did note, however, that there were less than comprehensive audits covering selected aspects of the transportation function conducted in March 2001 and 2002. These audits were part of a broader scope quality assurance audit. The inspectors observed that the licensee entered this deficiency into the facility's corrective action program system (CAPS). The issue owner was the Manager of Environment, Health and Safety. The licensee made the following commitments into the CAPS:

- Assure a complete audit of the transportation functions (programs and operations) by the end of calendar year 2002.
- Assure ownership for the transportation audit function is determined and formally documented by the end of calendar year 2002.
- Assure guidance is generated and documented to allow licensee management to be able to identify and maintain all key responsibilities, including regulatory commitments, during and after organizational restructuring by the end of January 2003.

(3) Conclusion

The licensee appropriately entered an audit deficiency into their corrective action program system. The deficiency involved the lack of a systematic and comprehensive audit of the shipping and transportation program. Although lesser audits had been performed, a systematic and comprehensive audit had not been conducted since the reorganization of the transportation function in 2000, due to the procedure system and audit structure not being revised appropriately.

c. Training

(1) Inspection Scope

The inspectors reviewed the hazardous material (HAZMAT) training program provided to hazmat employees involved with the handling of hazardous materials. The requirements for training hazmat employees are specified in 49 CFR 172 subpart H.

(2) Observations and Findings

The inspectors reviewed the training records of selected hazmat employees. The hazmat training included general awareness/familiarization training, function-specific training, and safety training. The type of work the hazmat employee performed would dictate which of three hazmat training elements the employee would receive. The licensee's training program was set up to provide the hazmat training once per three years in accordance with the requirements of 49 CFR 172.704(c)(2). The inspectors reviewed selected training records and the general awareness and safety training course material and determined that the hazmat training was acceptable and satisfied the requirements specified 49 CFR 172.704.

The inspectors also verified that function-specific training was provided in accordance with the requirements specified in 49 CFR 172.704 to randomly selected individuals of the shipping and traffic office who were directly responsible for the safety of transporting hazardous materials and involved with the preparation of hazardous materials for transportation.

(3) Conclusion

The hazmat training program was acceptable. Shipping function-specific training was provided to the appropriate individuals in accordance with the requirements specified in 49 CFR 172.704.

d. Preparation and Delivery of Completed Packages for Shipment

(1) Inspection Scope

The inspectors examined the licensee's written procedures related to the preparation and delivery of completed packages for shipment of licensed material.

(2) Observations and Findings

The inspectors verified that the licensee had procedures for the preparation of shipping packages and delivery of the MCC-model packages to the carrier for the shipment of unirradiated fuel assemblies. The inspectors reviewed selected portions of the following procedure:

- Maintenance Operating Procedure (MOP) -730713, Load Fuel Assembly into Model MCC Shipping Containers, Revision 70, dated August 13, 2002.

The procedure incorporated check off lists to ensure certain loading operations were performed in the appropriate sequence and in accordance with the NRC Certificate of Compliance (CoC) No. 9239.

(3) Conclusion

The licensee had acceptable management approved procedures to ensure that the fuel shipping packages would be safely loaded and in accordance with the NRC CoC.

e. Periodic Maintenance of Packages

(1) Inspection Scope

The inspectors reviewed selected portions of the licensee's program for periodic maintenance and refurbishment of fuel assembly shipping packages.

(2) Observations and Findings

Chapter 8 of the license application for the MCC model shipping container specified the acceptance tests, maintenance program, and re-certification program. In addition to the requirements specified in the NRC CoC No. 9239 for fuel shipping containers, the requirements for routine determinations specified in 10 CFR 71.87 and 49 CFR 173.475 were applicable.

The inspectors verified that the licensee had procedures for the periodic maintenance of the model MCC shipping packages. The inspectors reviewed selected portions of the following procedure:

- MOP-755707, Refurbishing Shipping Container, Revision 44

For reusable NRC-certified packaging for fuel assemblies, the inspectors examined the licensee's procedures and records for refurbishment and maintenance and verified that before re-use, all of the periodic maintenance required by the CoC (and Chapter 8 of the application) had been incorporated into the procedures and had been performed. During the inspection, the inspectors observed maintenance and refurbishment activities on four Model MCC fuel shipping containers, including the gasket inspection. The operators used the checklist in form CF-75B-002, Fuel Assembly Shipping Container Inspection Checklist to ensure that the required maintenance was performed. The inspectors observed that the package refurbishment area was clean, orderly, and the operators were knowledgeable of their procedures and craft.

(3) Conclusion

The procedures associated with the refurbishment of the fuel assembly shipping containers were acceptable and the maintenance activities were conducted safely in a work area that was clean and orderly.

f. Records

(1) Inspection Scope

The inspectors also reviewed shipping records for radioactive materials shipments.

(2) Observations and Findings

The inspectors verified that the licensee had current copies of the following NRC CoCs for packages used by the licensee to ship licensed material:

- NRC CoC 9239, Revision 12, USA/9239/AF, Model Nos. MCC-3, MCC-4, and MCC-5
- NRC CoC 6078, Revision 29, USA/6078/AF, Model Nos. 927A1 and 927C1
- NRC CoC 9196, Revision 18, USA/9196/AF, Model No. UX-30

The inspectors also verified that the licensee had registered with the NRC as a user of the NRC certified packages.

The inspectors noted that the licensee had requested that NRC CoC 6078 for shipping package model Nos. 927A1 and 927C1 be transferred from CE Nuclear Power LLC to Westinghouse Electric Company. The licensee received the authorization to transfer the CoC on October 10, 2000. The licensee accepted the responsibility for the maintenance of the certificates, the safety analyses for package designs, and the quality assurance records in accordance with the requirements of 10 CFR 71.91(c).

The inspectors reviewed licensee transportation activities regarding shipments of unirradiated fuel assemblies for the period January through July 2002. Selected records covering the period noted above for those consignments were reviewed in detail. The inspectors reviewed and discussed the documentation used, and subsequently maintained in the licensee's records for each radioactive material shipment, including, the Bill of Lading, Radioactive Material Shipment Record, Vehicle Inspection Report, Receipt and Loading Verification Checklist, Packing List (Fuel Assemblies/Component Assemblies), Fuel Shipment Information Form, Container Log Sheet, and Health Physics Survey Forms. The inspectors noted that the shipping records were complete and the information supplied on the shipping papers was correct.

(3) Conclusion

The licensee maintained the CoC for the NRC approved shipping containers used to ship radioactive materials in a well-organized manner. Shipping records for radioactive material shipments were complete and the information supplied on the shipping papers was accurate.

g. Reduction in Package Effectiveness Assessments

(1) Inspection Scope

The inspectors reviewed reduction in package effectiveness assessments documented by the licensee.

(2) Observations and Findings

The inspectors reviewed one reduction in package effectiveness assessment documented on July 16, 2002, pertaining to a damaged uranium hexafluoride (UF₆) cylinder valve discovered on June 27, 2002. The licensee's assessment included a review for any reportable defects applicable to the requirements specified in 10 CFR Part 21. An operator discovered the bent cylinder valve while trouble shooting for a UF₆ line pressure interlock. Upon further examination by the process engineer, integrated safety engineer, and the area team manager, it was concluded that the packing nut had an indentation that appeared to have been caused by an external impact. The licensee discussed this event with the UF₆ supplier (URENCO) on July 16, 2002. The UF₆ supplier concurred with the licensee that the damage to the valve did not occur at Westinghouse. The licensee recommended that URENCO formally review the event to determine if there are any defects that would be reportable per the requirements specified in 10 CFR Part 21.

The licensee considered the failure of a UF₆ cylinder valve in the ammonium diuranate (ADU) conversion ISA. Although the ISA considered this event important to safety, the failure of the UF₆ cylinder valve would not create a substantial safety hazard as defined in the criteria listed in Attachment 8.1 of licensee procedure RA-110, Identification and Reporting of Substantial Safety Hazards, Revision 6, December 20, 2001. The licensee recommended that no further action would be required and that the 10 CFR Part 21 review be closed.

(3) Conclusion

The licensee performed an adequate review of a reduction in package effectiveness issue. While an accident scenario involving the failure of a UF₆ cylinder valve was considered important to safety, the licensee concluded that this type of event would not create a substantial safety hazard.

h. Review of Previously identified Items

(1) Receipt and Opening of Packages

(a) Inspection Scope

The inspectors reviewed the licensee's corrective actions associated with Apparent Violation (AV) 70-1151/2002-03-01, Failure to Follow Approved Chemical Operating Procedures Involving Receipt Processing of Nuclear Material.

In addition, the inspectors reviewed the licensee's procedures and program for incoming radioactive material shipments to verify compliance with the applicable requirements in 10 CFR 20.1906 relating to the pickup from a carrier, receiving, and the safe opening of packages.

(b) Observations and Findings

The inspectors reviewed the licensee's corrective actions associated with AV 70-1151/02-03-01, which involved a worker who deliberately falsified documentation to reflect the completion of important procedural requirements related to receipt and processing of radioactive material. This resulted in 278 grams of uranium-235 being improperly shipped to BWX Technologies, in Lynchburg, Virginia. The apparent failure to follow procedures resulted in additional non-compliances with various regulatory requirements specified in 10 CFR Parts 20, 71, 74, and 49 CFR Parts 171-178. The AV was dispositioned by the NRC as a Severity Level III problem with six violations of NRC requirements as discussed in NRC letter titled, "Notice of Violation (NRC Inspection Report 70-1151/2002-03 and U.S. Nuclear Regulator Commission Office of Investigations Case Number 2-2001-022)," dated May 29, 2002. Based on this disposition, AV 70-1151/2002-03-01 is closed, and VIO 70-1151/2002-07-01 (EA-02-045) was opened.

The licensee's completed corrective actions were well documented in the above referenced NRC letter. In addition, the inspectors reviewed COP-836041, Receipt and Initial Processing of Uranium Shipments from Outside Sources, Revision 9. Significant procedural revisions included the following: (1) oversight provided by EH&S; (2) development of a form for validating and verifying empty pails prior to placing them in the B-25 shipping container; and (3) specification of the approved types of containers to be used so that any container not specified is excluded.

In addition on August 28, 2002, the inspectors verified that the licensee performed incoming receipt surveys of drums containing UNH crystals received from the BWX Technologies facility. The inspectors also observed that the UNH crystal package receipt, opening, material transfer, and container survey process was conducted efficiently, safely, and in accordance with the revised procedures. The inspectors observed that the material unloading work area was well laid out and included ventilated enclosures to control airborne radioactivity. The operators were knowledgeable of their procedures. Radiation and contamination surveys were conducted appropriately. The inspectors determined that the completed corrective actions were appropriate for closure of the violation. Based on this review, VIO 70-1151/2002-07-01 is closed.

(c) Conclusion

Apparent Violation (AV 70-1151/2002-03-01) for failure to follow chemical operating procedures was identified in inspection report number 70-1151/2002-03. This apparent violation has been dispositioned by the NRC as a Severity Level III problem (VIO 70-1151/2002-07-01) with six violations of NRC requirements. Based on this disposition, AV 70-1151/2002-03-01 is closed. Based on further NRC review, VIO 70-1151/2002-07-01 was also closed.

The UNH crystal package receipt, opening, material transfer, and container survey process was conducted efficiently, safely, and in accordance with established procedures. The management oversight of the radioactive material receipt process had greatly improved.

4. Radioactive Waste Management (IP 84850)

a. Inspection Scope

The scope of this inspection was to determine if the licensee maintained adequate management-controlled procedures, and to review the licensee's program for preparing waste shipping manifests as it pertained to the requirements of 10 CFR 20.1001-20.2401, Appendix G to 10 CFR Part 20, and 10 CFR Part 61.55 and 61.56.

b. Observations and Findings

The inspectors reviewed selected records for solid waste disposals, shipping manifests, and associated paper work for calendar year 2002. The inspectors verified that the licensee provided an acceptable level of information in the shipping papers to determine the quantities of individual radionuclides shipped. The inspectors discussed with the licensee the requirements of 10 CFR Part 20, Appendix G, Subsection III.A.3, which requires the conduct of a quality assurance program to assure compliance with §61.55 and §61.56, including management evaluation of the audits. The manifests were complete and met the applicable requirements of Appendix G to 10 CFR Part 20. The inspectors reviewed the licensee's waste shipment tracking log and verified that the licensee received an acknowledgment of receipt of the waste.

The inspectors noted that the licensee was in the planning stages to collect, prepare, and ship waste characterization samples to Envirocare. The licensee has not yet shipped any waste to this facility. The samples will include soil, building debris, rubble, concrete, and personal protective equipment.

c. Conclusion

The waste shipping manifests were complete and provided an acceptable level of information in the shipping papers to determine the quantities of individual radionuclides shipped. The licensee's waste shipping tracking records were complete and organized. The licensee was in the planning stages to collect, prepare, and ship a waste sample to Envirocare for a characterization analysis.

5. Exit Meeting

The inspection scope and results were summarized on August 29, 2002, with those persons indicated in the Attachment. The inspectors described the areas inspected and discussed in detail the inspection results. Although proprietary documents and processes were reviewed during this inspection, the proprietary nature of these documents or processes has been deleted from this report. No dissenting comments were noted during the exit meeting.

ATTACHMENT

1. PARTIAL LIST OF PERSONS CONTACTED

Licensee Personnel

*C. Aguilar, Environment, Health & Safety (EH&S) Senior Engineer
*B. Bayley, Nuclear Fuel Transport Manager
R. Ervin, Chemical Process Engineering Manager
R. Fischer, EH&S Senior Engineer
*D. Graham, EH&S Technician
*H. Green, Health Physics Technician
*J. Heath, Integrated Safety Engineering Manager
*J. McCormac, Chemical Process Engineer
*S. McDonald, EH&S Manager
*B. Monley, Operations Manager
F. Moorer, Transportation Specialist
S. Palmer, Container Engineer
*N. Parr, EH&S Licensing Engineer
*C. Perkins, Maintenance Manager
*D. Precht, Chemical Operations Manager
J. Rankar, Associate Integrated Safety Engineer
*T. Ross, Transportation Manager
W. Stillwell, Transportation Engineer

*Denotes those present at the exit meeting on August 29, 2002.

2. INSPECTION PROCEDURES USED

IP 84850 Radioactive Waste Management
IP 86740 Inspection of Transportation Activities
IP 88055 Fire Protection

3. LIST OF ITEMS OPENED, CLOSED, AND DISCUSSED

| <u>Item Number</u> | <u>Status</u> | <u>Description</u> |
|--------------------|---------------|--|
| 70-1151/2002-03-01 | Closed | AV: Failure to Follow Approved Chemical Operating Procedures Involving Receipt Processing of Nuclear Material (Paragraph 3.h). |
| 70-1151/2002-07-01 | Opened/Closed | VIO: Failure to follow chemical operating procedures which resulted in five additional non-compliances with regulatory requirements specified in 10 CFR Parts 20, 71, and 74, and 49 CFR Parts 171-178 (Severity Level III problem) (Paragraph 3.h). |

4. ACRONYMS AND ABBREVIATIONS

| | |
|-----------------|----------------------------------|
| ADU | Ammonium Diuranate |
| AV | Apparent Violation |
| BNFL | British Nuclear Fuels Limited |
| CAPS | Corrective Action Program System |
| CFR | Code of Federal Regulations |
| CoC | Certificate of Compliance |
| DOT | Department of Transportation |
| FHA | Fire Hazard Analysis |
| HAZMAT | Hazardous Materials |
| IP | Inspection Procedure |
| ISA | Integrated Safety Analysis |
| MOP | Maintenance Operating Procedure |
| NRC | Nuclear Regulatory Commission |
| SNM | Special Nuclear Material |
| UF ₆ | Uranium Hexafluoride |
| UNH | Uranyl Nitrate |
| WEC | Westinghouse Electric Company |