



July 8, 2005
GDP 05-2025

U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555-0001

Portsmouth Gaseous Diffusion Plant (PORTS)
Docket No. 70-7002, Certificate No. GDP-2
Reply to Inspection Report (IR) 70-7002/2005-002 Notice of Violation (NOV) 2005-002-01

The subject IR contained an NOV identifying a failure to document an equipment deficiency in accordance with procedural direction. The United States Enrichment Corporation's (USEC) response to this NOV is provided in Enclosure 1. Enclosure 2 lists the commitments contained in this submittal. The corrective actions specified in each enclosure apply solely to PORTS.

Should you have any questions regarding this matter, please contact Toni A. Brooks at (740) 897-2555.

Sincerely,

Patrick D. Musser
General Manager
Portsmouth Gaseous Diffusion Plant

Enclosures: As Stated

cc: NRC Regional Administrator – Region II
NRC Project Inspector – PORTS
NRC Branch Chief – Region II

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**United States Enrichment Corporation (USEC)
Reply to Notice of Violation (NOV) 70-7002/2005-002-01**

Restatement of Violation

Technical Safety Requirement 3.9.1 requires, in part, that approved written procedures be implemented for activities described in Safety Analysis (SAR) Report Section 6.11.4.1, and listed in Appendix A to Safety Analysis Report.

Appendix A of SAR Section 6.11 describes "work control" as an activity for which procedures shall be implemented.

Step 6.6 of Procedure XP2-US-FO1102, "Shift Routines," requires that each operator shall perform a thorough general inspection of their assigned areas each shift and note any deficiencies that may be present. Also, Step 6.6.2 of Procedure XP2-US-FO1112 requires that equipment deficiencies shall be documented in accordance with Procedure XP2-GP-GP1030, "Work Control Process," and/or Procedure XP2-BM-CI1030, "Problem Reporting."

Step 10.0 of Procedure XP4-CU-UG2196, "Routine Operation and Testing of X-640-1 Fire Water Diesel-Drive Pump," states, in part, that "a packing leak that would constitute a deficient condition is a continuous leak or drip resulting in standing water on the floor."

Contrary to the above, on and before April 26, 2005, operators performing shiftly general inspections of the X-640-1 pump house failed to document an equipment deficiency in accordance with Procedure XP2-GP-GP1030. Specifically, the operators failed to document that the secondary recycle valve packing was leaking continuously resulting in standing water on the floor.

USEC Response

USEC concurs with the violation as written.

I. Reason for Violation

Investigation into this issue has revealed that Operators had been trained to identify and document deficient material conditions during performance of their daily rounds but, contrary to procedure, failed to do so. The root cause of this violation was determined to be management's failure to enforce expectations regarding the identification and documentation of deficient material conditions.

The root cause investigation was broad based and identified several contributing causes, the most significant of which indicated a need for better management communications. Specifically, the criteria for determining deficient material conditions

at the X-640-1 and X-6644 Facilities, both fire water pump houses, was not effectively communicated to the operating staff. This, combined with other findings, indicate the need for increased senior management emphasis on identification and documentation of deficient material conditions and a need for retraining of the Utility Operations management staff.

II. Corrective Actions Taken and Results Achieved

- On April 26, 2005, the leaking secondary recycle valve packing was problem reported, a Material Deficiency Tag hung, and a work request submitted for its repair.
- On May 10, 2005, crew briefings were completed with Utility First Line Managers and Distribution and Inspection Operators which emphasized the importance of identifying deficient material conditions during shift rounds and the proper method of their documentation.
- On May 11, 2005, repairs to the secondary recycle valve packing were completed.
- By May 18, 2005, repairs were completed to other observed X-640-1 Pump House material deficiencies.

III. Corrective Actions to be Taken

1. Training will develop Conduct of Operations refresher training that emphasizes the recognition of material deficiencies and the proper method of documenting the deficiencies through the problem report and work control processes, including the use of Material Deficiency Tags.
2. Using crew briefs, Operations will retrain Utility Operations management and operating personnel to the requirements of XP2-CU-UG6210, "Service Test of High Pressure Fire Water Pumps". This item will be completed by November 11, 2005.
3. Flow down refresher training on the Conduct of Operations will be provided to all levels of personnel. Operations will be completed by November 18, 2005.
4. Conduct of Operations refresher training will be included on applicable Training Requirements Matrices (TRMs). Operations will complete this by December 9, 2005.

Actions 3 and 4 will also be taken by the Maintenance, Production Support, and the Plant Services Organizations.

IV. Date of Full Compliance

Full compliance was achieved on April 26, 2005 when the leaking secondary recycle valve packing was problem reported, a material deficiency tag hung, and a work request submitted for its repair. Actual repairs were completed on May 11, 2005.

List of Commitments*

1. By August 26, 2005, develop Conduct of Operations refresher training that emphasizes the recognition of material deficiencies and the proper method of documenting the deficiencies through the problem report and work control processes, including the use of Material Deficiency Tags.
2. By November 11, 2005, using crew briefs, Operations will retrain Utility Operations management and operating personnel to the requirements of XP2-CU-UG6210, "Service Test of High Pressure Fire Water Pumps".
3. By November 18, 2005, Operations will conduct flow down refresher training on Conduct of Operations to all levels of the Operations Organization.
4. By December 9, 2005, Operations will include Conduct of Operations refresher training on the applicable TRMs of Operations personnel.

*Regulatory commitments contained in this document are listed here. Other corrective actions listed in this submittal are not considered to be regulatory commitments in that they are either statements of actions completed or they are considered to be enhancements to USEC's investigation, procedures, programs, or operations.