



UNITED STATES
NUCLEAR REGULATORY COMMISSION

REGION II
SAM NUNN ATLANTA FEDERAL CENTER
61 FORSYTH STREET, SW, SUITE 23T85
ATLANTA, GEORGIA 30303-8931

September 22, 2005

NMED No. 050505

Mr. Russell B. Starkey, Jr.
Vice President - Operations
United States Enrichment Corporation
Two Democracy Center
6903 Rockledge Drive
Bethesda, MD 20817

SUBJECT: NRC INSPECTION REPORT NO. 70-7001/2005-006 AND NOTICE OF
VIOLATION - PADUCAH

Dear Mr. Starkey:

On August 27, 2005, the NRC completed a routine inspection at the Paducah Gaseous Diffusion Plant. The purpose of the inspection was to determine whether activities authorized by the certificate were conducted safely and in accordance with NRC requirements. At a meeting held on August 29, 2005, the NRC inspectors discussed the findings with members of your staff.

This inspection consisted of an examination of activities conducted under your certificate as they relate to safety and compliance with the Commission's rules and regulations and with the conditions of your certificate. Areas examined during the routine inspection are identified in the enclosed report. Within these areas, the inspection consisted of a selected examination of procedures and representative records, observations of activities in progress, and interviews with personnel.

Based on the results of this inspection, the NRC has determined that a Severity Level IV violation of regulatory requirements occurred. The violation was evaluated in accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG-1600, which is included on the NRC's web site at <http://www.nrc.gov>. The violation is cited in the enclosed Notice of Violation (Notice), and the circumstances surrounding the violation are described in detail in the subject inspection report. The violation involved the failure to adequately implement the procedure for performing the inspection of the C-337A jet station barrier frame.

The NRC has concluded that information regarding the reason for the violation, the corrective actions taken and planned to correct the violation and prevent recurrence is already adequately addressed on the docket in Inspection Report No. 70-7001/2005-006. Therefore, you are not required to respond to this letter unless the description therein does not accurately reflect your corrective actions or your position. In that case, or if you choose to provide additional information, you should follow the instructions specified in the enclosed Notice.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter and its enclosures 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/reading-rm/adams.html> (the Public Electronic Reading Room).

We will gladly discuss any questions you have concerning this inspection.

Sincerely,

/RA/ D. Seymour for

Jay L. Henson, Chief
Fuel Facility Inspection Branch 2
Division of Fuel Facility Inspection

Docket No. 70-7001
Certificate No. GDP-1

Enclosures: 1. Notice of Violation
2. NRC Inspection Report

cc w/encls:

S. Penrod, Paducah General Manager
S. R. Cowne, Paducah Regulatory Affairs Manager
P. D. Musser, Portsmouth General Manager
S. A. Toelle, Director, Nuclear Regulatory Affairs, USEC
Paducah Resident Inspector Office
R. M. DeVault, Regulatory Oversight Manager, DOE
G. A. Bazzell, Paducah Facility Representative, DOE
M. W. McKinley, Acting Manager, Radiation Health and Toxic Agents Branch, Commonwealth of Kentucky

Distribution w/encls: (See page 3)

PGDP

3

Distribution w/encls:

D. Martin, NMSS
R. Nelson, NMSS
D. Ayres, RII
J. Henson, RII
D. Hartland, RII
PUBLIC

***see previous concurrence**

X SISP REVIEW COMPLETE: Initials: DAS_____ ☐ SISP REVIEW PENDING*: Initials: _____ *Non-Public until the review is complete

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ADAMS: X Yes ACCESSION NUMBER: _____

OFFICE	RII:DFFI	RII:DFFI	RII:DFFI	RII:DFFI			
SIGNATURE	DH 9/22/05	DH 9/22/05	DH 9/22/05	DH 9/22/06			
NAME	BLBartlett*	MLThomas*	WLBritz*	DHartland*			
DATE	9/ /2005	9/ /2005	9/ /2005	9/ /2005	9/ /2005	9/ /2005	9/ /2005
E-MAIL COPY?	YES NO	YES NO	YES NO	YES NO	YES NO	YES NO	YES NO

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NOTICE OF VIOLATION

United States Enrichment Corporation
Paducah Gaseous Diffusion Plant

Docket No. 70-7001
Certificate No. GDP-1

During an NRC inspection conducted from July 3, through August 27, 2005, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedures for NRC Enforcement Actions," NUREG-1600, the violation is listed below:

Technical Safety Requirement (TSR) 3.9.1 requires, in part, that approved written procedures shall be implemented to cover the activities described in the Safety Analysis Report Section 6.11.4.1 and as listed in Appendix A to the Safety Analysis Report Section 6.11.

Appendix A to the Safety Analysis Report, Section 6.11, identifies TSR surveillances as activities that shall be covered by written procedures.

Surveillance Requirement 2.2.5.5-1 for TSR 2.2.5.5, "C-337A Jet Station Barrier Frame," requires that the frame be inspected for structural defects every five years.

Procedure CP2-EG-EG1048, Revision 2, "Inspections of AQ [Augmented Quality] Structures and Other Plant Operational Infrastructure Elements," is used to implement Surveillance Requirement 2.2.5.5-1. Step 6.2.9 of Procedure CP2-EG-EG1048 requires that the inspector document any deficiencies found in an assessment and tracking report (ATR). Step 6.2.10 of the procedure requires that design engineering perform the responsible disposition authority evaluation on deficiencies found in the ATRs.

Contrary to the above, on April 5, 2005, during an inspection of the C-337A jet barrier frame per Procedure CP2-EG-EG1048, certificatee personnel failed to document deficiencies regarding corrosion on the beams of the jet station barrier frame in an ATR and, therefore, a responsible disposition authority evaluation was not performed by design engineering .

This is a Severity Level IV Violation (Supplement VI).

The NRC has concluded that information regarding the reasons for the violation, the corrective actions taken and planned to correct the violation and prevent recurrence and the date when full compliance was achieved is already adequately addressed in this inspection report. However, you are required to submit a written statement or explanation pursuant to 10 CFR 2.201 (10 CFR 76.70) if the description therein does not accurately reflect your corrective actions or your position. In that case, or if you choose to respond, clearly mark your response as a "Reply to a Notice of Violation," and send it to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555 with a copy to the Regional Administrator, Region II, within 30 days of the date of the letter transmitting this Notice of Violation (Notice).

If you contest this enforcement action, you should also provide a copy of your response to the

Director, Office of Enforcement, United States Nuclear Regulatory Commission, Washington, D.C. 20555-0001.

If you choose to respond, your response will be made available electronically for public inspection in the NRC Public Document Room or from the NRC's document system (ADAMS), accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>. Therefore, to the extent possible, the response should not include any personal privacy, proprietary, or safeguards information so that it can be made available to the Public without redaction.

In accordance with 10 CFR 19.11, you may be required to post this Notice within two working days.

Dated this 22nd day of September 2005.

U.S. NUCLEAR REGULATORY COMMISSION

REGION II

Docket No.: 70-7001

Certificate No.: GDP-1

Report No.: 70-7001/2005-006

Facility Operator: United States Enrichment Corporation

Facility Name: Paducah Gaseous Diffusion Plant

Location: Paducah, KY

Dates: July 3, through August 27, 2005

Inspectors: Bruce L. Bartlett, Senior Resident Inspector
Mary L. Thomas, Resident Inspector
Wayne L. Britz, Fuel Facility Inspector

Approved by: Jay L. Henson, Chief
Fuel Facility Inspection Branch 2
Division of Fuel Facility Inspection

Enclosure 2

EXECUTIVE SUMMARY

United States Enrichment Corporation
Paducah Gaseous Diffusion Plant
NRC Inspection Report 70-7001/2005-006

This inspection included aspects of certificatee safety operations and facility support, and covered resident and region-based inspection activities, including follow-up to issues identified during previous inspections.

Plant Operations

- Routine operations activities were conducted in accordance with written procedures. Routine communications among operators were adequate. (Paragraph 2.a)
- In response to corrosion found on the C-337A jet station barrier frame, certificatee personnel performed an engineering analysis that determined the frame would perform its intended safety function. However, one violation was identified for failing to adequately implement the procedure for performing the frame inspection. (Paragraph 2.b)
- The certificatee took prompt and effective action in response to the disabling of the C-310 Cylinder Valve Closure System. The system operated when called upon during a manual closure. This item will remain open pending review of the certificatee's 60-day event report. (Paragraph 2.c)

Maintenance and Surveillance

- Maintenance and surveillance activities were conducted appropriately and in accordance with approved procedures. Acceptance criteria contained in surveillance procedures were adequate and, when required, assessment and tracking reports were initiated. (Paragraph 3.a)

Operator Training/Retraining

- The certificatee had a well developed and implemented program for training personnel. (Paragraph 4.a)
- The certificatee had a well developed and implemented program for training operators. (Paragraph 4.b)

Emergency Preparedness

- No issues were identified with the reorganization of the emergency management group and the physical relocation of the Joint Public Information Center. (Paragraph 5.a)
- The certificatee had adequate implementing procedures for emergency preparedness. (Paragraph 5.b)
- The certificatee adequately trained and staffed the emergency organization, established formal support agreements with off site agencies, and conducted required drills and exercises. (Paragraph 5.c)

- The certificatee maintained adequate emergency equipment and facilities. (Paragraph 5.d)

Management Organization and Controls

- The certificatee established an adequate organization with defined qualifications, responsibilities and functions to administer the technical programs. (Paragraph 6.a)
- The certificatee had an adequate program for development and implementation of procedures for the plant functions affecting safety. (Paragraph 6.b)
- The certificatee implemented an adequate internal review and audit program which included the plant operations review committee. (Paragraph 6.c)
- The certificatee implemented an adequate Quality Assurance Program. (Paragraph 6.d)

Attachment:

Partial List of Persons Contacted

Inspection Procedures Used

List of Items Opened, Closed, and Discussed

List of Acronyms

REPORT DETAILS

1. Summary of Plant Status

The certificatee performed routine operations throughout the inspection period. During the inspection period, plant assay was held steady.

2. Plant Operations

a. Conduct of Operations - Routine Operations Activities

(1) Scope and Observations (88100)

The inspectors observed routine operations activities and discussed routine operations with staff and management. In addition, the inspectors reviewed the applicable area control room log books and routine surveillance forms. The inspectors observed operators respond to various alarms.

The inspectors observed routine operations in the cascade buildings and area control rooms, the feed vaporization facilities, product and tails withdrawal facilities, and the central control facility. The operations staff were alert and generally knowledgeable of the current status of equipment associated with their assigned facilities.

(2) Conclusions

Routine operations activities were conducted in accordance with written procedures. Routine communications among operators were adequate.

b. Inadequate Inspection Of Jet Station Barrier Structure

(1) Scope and Observations (88100)

As documented in Inspection Report 70-7001/2005-005, during a safety system walkdown of the C-337A Feed Facility, the inspectors observed that corrosion had developed on the jet station barrier frame (JSBF) due to exposure to the weather. Corrosion was noted on the angle iron holding the bumper onto the southern beam such that the angle iron was separating from the beam. Corrosion was also noted at the junctions of the horizontal and vertical beams on this same side, and on the top side such that delamination had occurred in some places. In response, the certificatee declared the structure inoperable and developed a plan for further analysis and repair.

The certificatee took credit for the jet station barrier frame, as required by Technical Safety Requirement (TSR) 2.2.5.5, such that "the structural design characteristics of the C-337-A jet station barrier frame prevent a horizontal impact from a crane-carried load from causing a uranium hexafluoride (UF₆) primary system integrity failure in the C-337-A jet station piping. Analysis of the frame structure determined that a cylinder/barrier frame collision for fast speed conditions could cause the barrier frame to permanently deform, but in all analyzed collision scenarios the frame would not collapse or contact the UF₆ primary system piping."

The certificatee's analysis, as documented in Engineering Service Order ZA8320, concluded that, although the main structural member of the beam was severely corroded, the JSBF would have performed its intended safety function. The inspectors reviewed the analysis and had no issues regarding its conclusions. As corrective action, the certificatee repaired the beam and modified it by welding plates on the top and bottom sides to enclose it and prevent further corrosion. The work was completed and the structure was declared operable on August 11, 2005.

Upon further review, the inspectors noted that, on April 5, 2005, the certificatee performed an inspection using Procedure CP2-EG-EG1048, Revision 2, "Inspections of AQ [Augmented Quality] Structures and Other Plant Operational Infrastructure Elements." This procedure was used to implement Surveillance Requirement 2.2.5.5-1 to support the TSR basis statement. A checklist was used to perform the inspection which was performed visually from the ground.

The engineer performing the inspection noted the same issues as the inspectors and documented the bumper angle iron corrosion issue in Assessment and Tracking Report (ATR) 05-1370. Work Request 5074852 was also entered into the certificatee's work control program to repair the angle iron. However, the engineer did not recognize the severity of the corrosion on the junctions on the horizontal and vertical beams and did not examine the top of the beam for the extent of the corrosion. In addition, the engineer did not document the beam corrosion issue in an ATR.

Step 6.2.9 of Procedure CP2-EG-EG1048 required the engineer to document any deficiencies found during the inspection of the frame in ATRs. Step 6.2.10 of the same procedure required that design engineering perform the responsible disposition authority evaluation on deficiencies documented in the ATRs generated. Contrary to the above, on April 5, 2005, the certificatee did not document deficiencies regarding corrosion found on the jet station barrier frame beams and, therefore, design engineering did not perform the responsible disposition authority evaluation of the deficiencies. This is a violation (VIO 70-7001/2005-006-01).

As corrective action, affected certificatee staff were briefed on expectations regarding the performance of structural inspections. The certificatee also intended to prepare a standard that described the scope and purpose of the quality-related structures inspection program. This standard would provide detailed guidance and management expectation for administration of the program and conduct of inspections to include eyes-on inspection of all structural members to be inspected, as well as details for inspecting the effects of corrosion. The certificatee also intended to train personnel assigned to perform such inspections. In addition, certificatee management also intended to develop inspection criteria specific to the C-337A JSBF.

(2) Conclusions

In response to corrosion found on the C-337A JSBF, certificatee personnel performed an engineering analysis that determined the frame would perform its intended safety function. However, one violation was identified for failing to adequately implement the procedure for performing the frame inspection.

c. Cylinder Valve Closure System Nitrogen Bottle Depressurization

(1) Scope and Observations (88100)

On July 28, 2005, a plant operator observed that the gauge on the nitrogen bottle for the Cylinder Valve Closure System in the C-310 Building was reading zero pounds per square inch gauge (psig). The plant shift superintendent was contacted and declared the system inoperable. Withdrawal Positions 3 and 4 were placed in standby mode in a timely manner in accordance with the required actions for limiting condition of operation of TSR 2.3.4.1.

The Cylinder Valve Closer System was required to be operable by TSR 2.3.4.1 when filling cylinders. The function of the system was to close the cylinder valve in the event of an actuation of the UF₆ Release Detection and Isolation System. The safety-related nitrogen bottle was the backup to the normal motive force of the non-safety related plant air system. The certificatee made a 24-hour notification to the NRC as an event in which equipment required by the TSR was disabled.

The certificatee's preliminary assessment concluded that a safety-related solenoid valve developed a leak to atmosphere. A design deficiency was also identified, as the low pressure alarm sensing location was located on the line common to both the nitrogen and normal plant air, and normal plant air pressure was maintained. The nitrogen bottle had last been verified to be properly pressurized at a regular periodic check during the previous day.

Upon identifying that the nitrogen bottle gauge was reading zero psig, the operators took the manual handswitch to close and the emergency isolation valve was successfully closed. Subsequently, the certificatee determined that the bottle contained about 100 psig of nitrogen. As immediate corrective action, the certificatee replaced the nitrogen bottle and leaking solenoid and restored the system to operable. After discussions were held with the inspectors, operations personnel began performing hourly checks of the nitrogen bottle pressure. Certificatee management also intended to modify the low pressure alarm sensing location to directly monitor and alarm on low nitrogen bottle pressure. Pending this modification, the additional hourly checks would be continued. This item will remain open pending review of the certificatee's 60-day event report.

(2) Conclusions

The certificatee took prompt and effective action in response to the disabling of the C-310 Cylinder Valve Closure System. The system operated when called upon during a manual closure. This item will remain open pending review of the certificatee's 60-day event report.

c. Certificatee Event Reports (92700)

The certificatee staff made the following operations-related event report during the inspection period. The inspectors evaluated any immediate safety concerns indicated at the time of the initial verbal notification. The inspectors will review the associated written report for the event following submittal, as applicable.

<u>Event No.</u>	<u>NMED No.</u>	<u>Date</u>	<u>Status</u>	<u>Title</u>
41882	050505	07/28/05	Open	C-310 Cylinder Valve Closure System nitrogen bottle was reading zero psig.

d. Miscellaneous Open Item Closures (92701)

(Closed) URI 2005-005-01: The inspectors' review of the certificatee's analysis of the as-found condition of the jet station barrier frame, including the ability to perform its intended safety function. This unresolved item is closed to VIO 70-7001/2005-006-01.

3. Maintenance and Surveillance

a. Maintenance and Surveillance Activity Reviews

(1) Scope and Observations (88102 and 88103)

For the maintenance and surveillance activities listed below, the inspectors verified one or more of the following: activities observed were performed in a safe manner; testing was performed in accordance with procedures; measuring and test equipment was within calibration; TSR limiting conditions for operations were entered, when appropriate; removal and restoration of the affected components were properly accomplished; test acceptance criteria were clear and conformed with the TSR and the Safety Analysis Report; and any deficiencies or out-of-tolerance values identified during the testing were documented, reviewed, and resolved by appropriate management personnel.

- Work Order (WO) 0509968, Repair/replace high pressure fire water tank isolation valve;
- WO 0510917, Replace PL-HOV-020 in the C-360 transfer room;
- WO 0507681, Calibrate feed header instrumentation for Feed Header No. 1 in C-337A in accordance with Procedure CP4-GP-IM6509, "C-337/C-337A Calibration UF₆ Feed Flow Instrumentation," Revision 4;
- WO 0511684, Check nitrogen bottle pressure and replace nitrogen bottle pressure regulator PCV-1 for C-310 Withdrawal Positions 3 and 4 Emergency Valve Closure System;
- WO 0511726, Replace solenoid valve PY-211 on Emergency Valve Closure System;

- WO 0509938, Surveillance Requirement 2.3.4.1-3, Verify nitrogen is available to power receiving cylinder valve closer air motor in order to close cylinder valve (pressure check);
- WO 0510859, Annual and quarterly CAAS surveillance on Cluster R;
- WO 0508705, Monthly manual start surveillance of High Pressure Fire Water System Pumps 2 and 3;
- WO 0508648, Service scale beam on NMCA Scale No. 11;
- WO 0511069, Verify minimum torque on cylinders; and
- WO 0501828, Final electrical tie in of C-310 CAAS air compressor.

The inspectors observed that the certificatee staff effectively implemented work control practices and associated radiological controls during the above listed maintenance activities.

(2) Conclusions

Maintenance and surveillance activities were conducted appropriately and in accordance with approved procedures. Acceptance criteria contained in surveillance procedures were adequate and, when required, assessment and tracking reports were initiated.

4. Operator Training/Retraining (IP 88010)

- a. 10 CFR 19.12 Training (F2.01)
General Nuclear Criticality Safety Training (F2.02)
General Radiological Safety Training (F2.03)
General Emergency Training (F2.04)

(1) Scope and Observations

The inspectors reviewed the certificatee's program for 10 CFR 19.12 training and general nuclear criticality safety, radiological safety, and emergency training. The inspectors observed training classes for radiological safety and discussed the program with training department instructors and management. Training modules, qualification standards, training development and administrative guides, and training records were reviewed. The inspectors determined that the training program was a well developed and implemented program.

(2) Conclusions

The certificatee had a well developed and implemented program for training personnel.

b. Operating Procedure Training (F2.05)
On-the-job Training (F2.06)

(1) Scope and Observations

The inspectors reviewed the certificatee's program for operator training and on-the-job training. The inspectors reviewed the training development and administrative guides for cascade operations, observed on-the-job training in cascade operations, and discussed the training program with the trainers and trainees. The training program for operators was observed to be a well developed and implemented program

(2) Conclusions

The certificatee had a well developed and implemented program for training operators.

5. Emergency Preparedness (IP 88050)

a. Review of Program Changes (F3.01)

(1) Scope and Observations

The inspectors reviewed the emergency management operations with the staff. Program changes since the last emergency preparedness inspection included the reorganization of the emergency management function to the Nuclear Regulatory Affairs group. The certificatee was in the process of moving the Joint Public Information Center to another location. The inspectors had no issues with these program changes.

(2) Conclusions

No issues were identified with the reorganization of the emergency management group and the physical relocation of the Joint Public Information Center.

b. Implementing Procedures (F3.02)

(1) Scope and Observations

The inspectors reviewed the certificatee's emergency plan and implementing procedures. The procedures were reviewed and approved as specified in the plan. The emergency instructions in various plant locations were reviewed and discussed with plant operators. Procedures and instructions were observed to be current. The procedures provided for the detection and classification of accidents, assessment of releases, personnel accountability, and notification to agencies.

(2) Conclusions

The certificatee had adequate implementing procedures for emergency preparedness.

- c. Training and Staffing of Emergency Organization (F3.03)
Off site Support (F3.04)
Drills and Exercises (F3.05)

- (1) Scope and Observations

The inspectors reviewed the certificatee's training for onsite personnel. Records were examined in the emergency management administrative tracking system for training, surveillances, quarterly commitments, etc. Training records were also maintained in the certificatee's training department. The plant call list, pager system, and depth of personnel available for emergencies were reviewed. The pre-fire plan was reviewed and observed to be current.

Offsite support was reviewed. Letters of agreement were current. Training records and briefing packages for offsite personnel support were reviewed. The certificatee's records for drills and exercises were also reviewed. Drill purpose, objectives, scenarios and critiques were documented. The quarterly communications checks with offsite response organizations were conducted. Offsite response organizations adequately participated in exercises.

- (2) Conclusions

The certificatee adequately trained and staffed the emergency organization, established formal support agreements with offsite agencies, and conducted required drills and exercises.

- d. Emergency Equipment and Facilities (F3.06)

- (1) Scope and Observations

The inspectors reviewed the certificatee's equipment and facilities in the fire department building and in Building 300. The equipment was observed to be in good condition, and the required equipment inspections and calibrations were being conducted. The emergency control center was observed to contain the equipment required by the plan and was adequate for operation.

- (2) Conclusions

The certificatee maintained adequate emergency equipment and facilities.

6. **Management Organization and Controls (IP 88005 and 88105)**

- a. Organizational Structure (O5.01)

- (1) Scope and Observations

The inspectors reviewed the facility organizational structure, organizational changes since the last inspection, and qualifications of personnel impacted by the organizational changes. The inspectors reviewed changes to senior management and an organizational restructure of the emergency preparedness group. Personnel impacted

by the senior management changes were qualified for those positions. The emergency preparedness group was moved from the Plant Services group to Nuclear Regulatory Affairs. The approval package for the change was reviewed by the inspectors, including the changes required for various plant documents. The inspectors also reviewed overtime records for the past six months and verified that all overtime received prior management approval.

(2) Conclusions

The certificatee established an adequate organization with defined qualifications, responsibilities, and functions to administer the technical programs.

b. Procedure Controls (O5.02)

(1) Scope and Observations

The inspectors reviewed the program for developing and approving procedures to comply with the certificate requirements. No issues were identified.

(2) Conclusions

The certificatee had an adequate program for development and implementation of procedures for the plant functions affecting safety.

c. Internal Reviews and Audits; Safety Committees, (O5.03; O5.04)

(1) Inspection Scope and Observations

The inspectors reviewed the certificatee's internal audit reports for training and management. The reports for management review of the operating experience review program, management oversight of plant activities, inspection and test personnel qualification and quality control support of work, self assessment program, plant operations review committee, records management/document control, and procedures program were reviewed. The reports were detailed reviews including constructive findings and observations.

The certificatee's review of issues concerning equipment in a cascade building were inspected. The inspectors reviewed the equipment, the plant change review committee documentation, the decreased effectiveness evaluation, and the unresolved safety question determination. The inspectors determined that the certificatee performed an adequate review of the equipment issues.

The inspectors verified that provisions were established to determine the status, adequacy, and effectiveness of the Quality Assurance Program at least once every 24 months. No issues were identified.

(2) Conclusions

The certificatee implemented an adequate internal review and audit program which included the plant operations review committee.

d. Quality Assurance Programs (O5.05)

(1) Scope and Observations

The inspectors reviewed the certificatee's established program for the conduct of Nuclear Safety and Quality activities as described in Procedure CP3-QA-QA1070, "Conduct of NS&Q Activities," Revision 5. No issues were identified.

(2) Conclusions

The certificatee implemented an adequate Quality Assurance Program.

7. **Exit Meeting Summary**

The inspection scope and results were summarized on August 29, 2005, with General Manager Steve Penrod and members of the facility management. The inspectors asked the certificatee staff whether any materials examined during the inspection should be considered proprietary. No proprietary information was identified.

ATTACHMENT

1. **PARTIAL LIST OF PERSONS CONTACTED**

Certificatee

S. Penrod, General Manager
M. Keef, Plant Manager
S. Cowne, Nuclear Regulatory Affairs Manager
M. Boren, Nuclear Regulatory Affairs
R. Helme, Engineering Manager
C. Hicks, Scheduling Manager
P. Jenny, Security Manager
C. Jones, Nuclear Safety and Quality, Independent Assessments Manager
M. Mack, Operations
M. McClure, Mechanical Maintenance Manager
D. Page, Plant Shift Superintendent Manager
V. Shanks, Waste Management/Environmental Compliance Manager
K. Stratemeyer, UF₆ Handling Manager
D. Snow, Health and Safety Manager
J. Vogelsang, Procurement and Materials

Other certificatee employees contacted included engineers, technicians, and office personnel.

2. **INSPECTION PROCEDURES USED**

IP 88005	Management Organization and Control
IP 88010	Operator Training/Retraining
IP 88050	Emergency Preparedness
IP 88100	Plant Operations
IP 88101	Configuration Control
IP 88102	Surveillance Observations
IP 88103	Maintenance Observations
IP 88105	Management Organization and Control
IP 92700	Onsite Followup of Written Reports of Nonroutine Events at Power Reactor Facilities
IP 92701	Follow-up

3. **LIST OF ITEMS OPENED, CLOSED, AND DISCUSSED**

<u>Item Number</u>	<u>Status</u>	<u>Type</u>	<u>Description</u>
2005-005-01	Closed	URI	The inspectors' review of the certificatee's analysis of the as-found condition of the jet station barrier frame, including the ability to perform its intended safety function. (Paragraph 2.d)

2005-006-01	Open/Closed	NOV	Failure to document deficiencies regarding corrosion found on the jet station barrier frame beams and, as a result, design engineering did not perform a the responsible disposition authority evaluation of the deficiencies. (Paragraph 2.b)
41882	Open	CER	C-310 Cylinder Valve Closure System nitrogen bottle was reading zero psig. (NMED No. 050505) (Paragraph 2.c)

4. **LIST OF ACRONYMS USED**

ADAMS	Agencywide Documents Access and Management System
AQ	Augmented Quality
ATR	Assessment and Tracking Report
CFR	Code of Federal Regulations
GDP	Gaseous Diffusion Plant
JSBF	Jet Station Barrier Frame
IP	Inspection Procedure
NRC	Nuclear Regulatory Commission
PARS	Publicly Available Records
PDR	Public Document Room
PGDP	Paducah Gaseous Diffusion Plant
psig	pounds per square inch guage
TSR	Technical Safety Requirement
UF ₆	Uranium Hexafluoride
URI	Unresolved Item
USEC	United States Enrichment Corporation
VIO	Violation
WO	Work Order