

August 29, 2007

Mr. Cary Alstadt, Plant Manager
Westinghouse Electric Company
Commercial Nuclear Fuel Division
P.O. Drawer R
Columbia, SC 29250

SUBJECT: INSPECTION REPORT NO. 70-1151/2007-202 AND NOTICE OF VIOLATION

Dear Mr. Alstadt:

The U.S. Nuclear Regulatory Commission (NRC) conducted a routine and announced criticality safety inspection at your facility in Columbia, South Carolina, from July 30 through August 3, 2007. The purpose of the inspection was to determine whether activities involving licensed material were conducted safely and in accordance with NRC requirements. Observations and findings were discussed with your staff throughout the inspection and during an exit meeting held on August 2, 2007.

The inspection, which is described in the enclosure, focused on the most hazardous activities and plant conditions; the most important controls relied on for safety and their analytical basis; and the principal management measures for ensuring controls are capable, available, and reliable to perform their functions relied on for safety. The inspection consisted of analytical basis review, selective review of related procedures and records, examinations of relevant nuclear criticality safety (NCS)-related equipment, interviews with NCS engineers and plant personnel, and facility walkdowns to observe plant conditions and activities related to safety basis assumptions and related NCS controls.

Based on the results of this inspection, the NRC has determined that one Severity Level IV violation of NRC requirements occurred. The violation was evaluated in accordance with the NRC Enforcement Policy included on the NRC's web site at www.nrc.gov; select What We Do, Enforcement, then Enforcement Policy. The violation is being cited in the enclosed Notice of Violation (Notice), and the circumstances surrounding it are described in detail in the subject inspection report. The violation is being cited in the Notice because it was identified as a result of NRC inspection. The violation being cited as a Severity Level IV violation is the storage of moderating material near a fissile drum array contrary to posted requirements.

You are required to respond to this letter and should follow the instructions specified in the enclosed Notice of Violation when preparing your response. The NRC will use your response, in part, to determine whether further enforcement action is necessary to ensure compliance with regulatory requirements.

C. Alstadt

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In accordance with 10 CFR 2.390 of NRC's "Rules of Practice," a copy of this letter and the enclosure will be made publicly available in the public electronic reading room of the NRC's Agencywide Documents Access and Management System (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/ADAMS.html>.

If you have any questions concerning this report, please contact Dennis Morey, of my staff, at (301) 492-3112.

Sincerely,

/RA/

Deborah A. Jackson, Chief
Technical Support Branch
Division of Fuel Cycle Safety
and Safeguards, NMSS

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

Enclosures: 1. Notice of Violation
2. Inspection Report 70-1151/2007-202

cc w/enclosures: Mr. Marc Rosser
Westinghouse Electric Company

cc w/o enclosures: T. Pearce O'Kelley
Bureau of Radiological Health
South Carolina Department of Health
and Environmental Control

C. Alstadt

-2-

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NOTICE OF VIOLATION

Westinghouse Electric Company
Columbia, South Carolina

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

During an NRC inspection from July 30 through August 3, 2007, a violation of NRC requirements was identified. In accordance with the NRC Enforcement Policy, the violation is listed below:

Section 3.4 of the License Application states, in part, that operations to assure safe, compliant activities involving nuclear material will be conducted in accordance with approved procedures.

Section 3.4 of the License Application states, in part, that criticality postings provide instruction or specific precautions to personnel by "supplementing operating procedures."

Criticality safety posting GEN-09, Step 5, posted at the entrance to the integral fuel burnable absorber (IFBA) pellet archive room, states that "water, plastic, or other moderating materials shall not be permitted unless authorized by procedure."

Contrary to the above, on July 31, 2007, three 6-inch and 8-inch flexible pipe sections were observed stored on top of drums containing fissile material in the IFBA pellet archive room.

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

Pursuant to the provisions of 10 CFR 2.201, Westinghouse Electric Company is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with copies to the Chief, Technical Support Branch, Division of Fuel Cycle Safety and Safeguards, NMSS, and Regional Administrator, Region II, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include: (1) the reason for the violation, or, if contested, the basis for disputing the violation; (2) the corrective steps that have been taken and the results achieved; (3) the corrective steps that will be taken to avoid further violations; and (4) the date when full compliance will be achieved. Your response may reference or include previously docketed correspondence if the correspondence adequately addresses the required response. If an adequate reply is not received within the time specified in this Notice, an Order or Demand for Information may be issued as to why the license should not be modified, suspended, or revoked, or why such other actions as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

If you contest this enforcement action, you should also provide a copy of your response to the Director, Office of Enforcement, U.S. Nuclear Regulatory Commission, Washington, D.C. 20555-0001.

Enclosure 1

Because your response will be made available electronically for public inspection in the NRC Public Document Room (PDR), or from the NRC's document system (ADAMS), accessible from the NRC web site at <http://www.nrc.gov/reading-rm/adams.html>, to the extent possible, it should not include any personal privacy, proprietary, or safeguards information so that it can be made available to the public without redaction. If personal privacy or proprietary information is necessary to provide an acceptable response, then please provide a bracketed copy of your response that identifies the information that should be protected and a redacted copy of your response that deletes such information. If you request withholding of such material, you must specifically identify the portions of your response that you seek to have withheld, and provide in detail the bases for your claim of withholding (e.g., explain why the disclosure of information will create an unwarranted invasion of personal privacy or provide the information required by 10 CFR 2.790(b) to support a request for withholding confidential commercial or financial information). If safeguards information is necessary to provide an acceptable response, please provide the level of protection described in 10 CFR 73.21.

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

Dated this 29th day of August 2007

**U. S. NUCLEAR REGULATORY COMMISSION
OFFICE OF NUCLEAR MATERIAL SAFETY AND SAFEGUARDS**

Docket No.: 70-1151

License No.: SNM-1107

Report No.: 70-1151/2007-202

Licensee: Westinghouse Electric Company

Location: Columbia, South Carolina

Inspection Dates: July 30 through August 3, 2007

Inspectors: Dennis Morey, Senior Criticality Safety Inspector
Christopher Tripp, Criticality Safety Inspector
Cinthya Román-Cuevas, Chemical Safety Reviewer

Approved by: Deborah A. Jackson, Chief
Technical Support Branch
Division of Fuel Cycle Safety
and Safeguards, NMSS

Enclosure 2

EXECUTIVE SUMMARY

Westinghouse Electric Company NRC Inspection Report 70-1151/2007-202

Introduction

Staff of the U.S. Nuclear Regulatory Commission (NRC) performed a routine and announced nuclear criticality safety (NCS) inspection of the Westinghouse Electric Company, Columbia, South Carolina, facility from July 30 through August 3, 2007. The inspection included an on-site review of the licensee NCS program, NCS evaluations, NCS audits, recent NCS-related events, and open items. The inspection focused on risk-significant fissile material processing activities and areas including uranium recycle and recovery including solvent extraction and the incinerator, ammonium diuranate (ADU) conversion, pelleting, integrated fuel burnable absorber (IFBA) and Erbia process areas, wastewater processing areas, and laboratories.

Results

- A severity level IV violation was identified due to storage of moderating material near a fissile drum array contrary to posted requirements.
- An unresolved item was identified regarding the credibility of accident sequences related to floor storage of 55-gallon drums.
- Other than the question regarding credibility of accident sequences, no safety concerns were identified regarding the licensee NCS program.
- No safety concerns were identified regarding licensee NCS audits.

REPORT DETAILS

1.0 Summary of Plant Status

Westinghouse Electric Company (WEC) manufactures light water reactor fuel at its Columbia, SC, facility. During the inspection, the plant was operating at full capacity in all manufacturing areas. At the time of the inspection, the facility incinerator was shut down for maintenance.

2.0 NCS Program (IP 88015, IP 88016)

a. Inspection Scope

The inspectors reviewed selected NCS evaluations to determine that criticality safety of risk-significant operations was assured through engineered and administrative controls with adequate safety margin and preparation and review by qualified staff. The inspectors reviewed selected aspects of the following documents:

- Procedure RA-313, "Criticality Safety Evaluations [CSE]," Revision 5, dated April 4, 2007
- CSE-01-C, "IFBA Dry Ventilation System," Revision 0, dated March 2007
- CSE-04-A, "Safe Geometry Dissolver System," Revision 3, dated March 2007
- CSE-03-H, "Conversion Lines, Oil Dryers and Bucket Elevators," Revision 0, dated June 2007
- CSE-03-M, "Operation of Q Tank Bag Filters," Revision 0, dated March 2007
- CSE-08-D, "Pellet Grinder Line," Revision 2, dated February 2007
- CSE-11-A, "Uranium Scrap Cage Dissolver," Revision 0, dated April 2006
- CSE-16-B, "Storage of Uranium Bearing Materials (Polypak Storage Carts)," Revision 0, dated July 17, 2007
- CSE-16-C, "Mop Buckets," Revision 0, dated January 2007
- CSE-16-E, "Storage of Uranium Bearing Materials (IFBA Rod Unloading Storage)," Revision 0, dated February 21, 2007
- CSE-16-F, "Floor Storage of SNM," Revision 0, dated December 2006

b. Observations and Findings

The inspectors determined that NCS evaluations were prepared by qualified NCS engineers, that independent reviews of the evaluations were completed by other qualified NCS engineers, and that appropriate limits on controlled parameters were established and maintained. The inspectors determined that NCS controls for equipment and processes assured the safety of the operations.

The inspectors noted that changes to the pellet grinder CSE added an administrative control to inspect the pellet grinder bowl for accumulation in case the credited level detector fails and that changes to the dissolver system CSE involved simplifying the process by removing dilution and collection tanks and replacing two pumps with a new pump. The licensee had also developed a new CSE for the scrap cage dissolver in order to process wet ammonium diuranate filtercake process waste (e.g., rags). The inspectors did not identify any safety concerns related to these changes.

During review of IFI 70-1151/2006-202-02, the inspectors reviewed the new floor storage CSE (CSE-16-F) and the supporting calculation (CN-CRI-06-18) for 55-gallon drums. The inspectors noted that several accident sequences involving spacing upsets for 55-gallon drums were considered "not credible." The inspectors questioned whether these accident sequences were truly not credible, because they involved mainly the failure of administrative controls. The licensee stated that they were not credible because they involved many unlikely human failures without reason or motive (as stated in NUREG-1520, Section 3.4.3.2(9)). The licensee showed that up to five drums in various close-packed or stacked arrangements would still be subcritical. The inspectors pointed out, however, that NUREG-1520 states that "the fact that an event is not 'credible' must not depend on any facility feature that could credibly fail to function, or be rendered ineffective as a result of a change to the system." Subcriticality calculations used to determine that criticality was not credible assumed mass and geometry controls, and therefore relied on engineered and administrative features that could fail or be rendered ineffective as the result of a change. An argument in which the system is shown to be subcritical following failure of a control may be part of the basis for double contingency, but is inappropriate for demonstrating events are not credible if based on facility features that must be controlled. The licensee stated that its practices were consistent with the integrated safety analysis (ISA) methodology which had been approved by the NRC. The inspectors noted that the ISA is under review and that the above credibility determinations may not actually comply with the reviewed ISA methodology. The use of calculations based on facility features that might credibly be changed to demonstrate that criticality accident sequences are not credible is **Unresolved Item (URI) 70-1151/2007-202-01**.

c. Conclusions

An unresolved item was identified regarding the credibility of accident sequences related to floor storage of 55-gallon drums.

Other than the question regarding credibility of accident sequences, no safety concerns were identified regarding the licensee NCS program.

3.0 NCS Inspections, Audits, and Investigations (IP 88015)

a. Inspection Scope

The inspectors reviewed results of the most recent NCS quarterly audits to assure that appropriate issues were identified and resolved. The inspectors reviewed selected aspects of the following documents:

- EHS-07-06, "NCS Program Audit Report," dated May 16, 2007
- EHS-07-12, "Chemical Area Formal Compliance Audit," dated July 30, 2007
- EHS-07-14, "Mechanical Area Formal Compliance Audit," dated June 29, 2007

b. Observations and Findings

The inspectors reviewed licensee audit reports and interviewed NCS staff. The inspectors discussed the selected audit findings with the licensee NCS staff. The

inspectors determined that licensee NCS audits were conducted in accordance with written procedures. The inspectors noted that the audits involved review of open NCS issues from previous audits; review of the adequacy of NCS control implementation; and review of plant operations for compliance with license requirements, procedures, and postings.

c. Conclusions

No safety concerns were identified regarding licensee NCS audits.

4.0 Plant Operations (IP 88015, IP 88016)

a. Inspection Scope

The inspectors performed plant walkdowns to review activities in progress and to determine whether risk-significant fissile material operations were being conducted safely and in accordance with regulatory requirements. The inspectors reviewed selected aspects of the following documents:

- CN-CRI-06-18, "Storage of 55 Gallon Drums," Revision 1, dated July 18, 2006
- CN-CRI-07-12, "Drum Storage of Archive Pellet Cans," Revision 0, dated April 2007

b. Observations and Findings

The inspectors interviewed operators, NCS engineers, and process engineers both before and during walkdowns. The inspectors performed walkdowns of risk-significant fissile material processing activities and areas including uranium recycle and recovery including solvent extraction and the incinerator, ADU conversion, powder processing, and pelleting areas, integrated fuel burnable absorber (IFBA) and Erbium process areas, wastewater processing areas, and laboratories. The inspectors observed that controls identified in CSEs were installed or implemented and were adequate to ensure safety.

During a walkdown of the solvent extraction area, the inspectors noted that the use of dikes or berms around process vessels was not uniform. CSE-7-A, Rev. 3, "Criticality Safety Evaluation for the Solvent Extraction System," assumed that, upon a large leak from a process vessel, solution would form a safe slab configuration on the floor. The inspectors determined that the licensee had not surveyed the floor and did not have floor drains in the solvent extraction area. The inspectors determined, however, that the process room floor did not appear to have excessive slope and did not contain any obvious accumulation points. In addition, operations staff stated that process vessel leaks historically had not displayed any tendency to migrate from the solvent extraction area. Based on their walk-through, historical data, and the fact that the subcritical slab-depth in the facility is taken to be 4-inches, the inspectors determined that the licensee assumption that spilled solution would not accumulate into an unfavorable geometry was adequate.

During a walkdown of the IFBA area, the inspectors observed three flexible pipe sections stored on top of drums containing fissile material in the IFBA pellet archive room. The inspectors noted that the archive drums were stored in an array and were allowed to

contained up to 800 grams of U^{235} per drum. In addition, the inspectors noted that criticality safety posting GEN-09, Step 5, posted at the entrance to the IFBA pellet archive room, states that "water, plastic, or other moderating materials shall not be permitted unless authorized by procedure." The inspectors determined that the flexible pipe sections were not authorized by any procedure.

The inspectors reviewed criticality analysis applicable to the archive pellet drum storage array and noted that upset conditions involving the array were analyzed using full reflection conditions (12 inches of concrete or water) on the bottom and sides of the array and partial reflection conditions (one inch of water) on the top. These reflector conditions were based on the proximity of two of the room walls and the floor along with the possibility that limited amounts of moderating materials might be placed near or on top of the drum array. Section 6.1.3(f) of the license application requires, in part, that systems be designed and operated with an assumption of either full or partial reflection where full reflection and partial reflection are defined as 12 inches and 1 inch water equivalent, respectively. Section 6.1.3(f) of the license application further requires, in part, that in systems where equipment location or design limits the placement of moderating materials (including humans), near the specific system, partial reflection may be used. The inspectors determined that the thickness of the pipe sections (maximum of 30 mm) challenges the one inch partial reflection condition, such that its storage on top of the archive drums might conflict with the license whether or not it was restricted by a posted requirement. Storage of flexible pipe sections on drums containing fissile material contrary to posted requirements which restricted moderating materials is **Violation (VIO) 70-1151/2007-202-02**.

c. Conclusions

A severity level IV violation was identified due to storage of moderating material near a fissile drum array contrary to posted requirements.

5.0 Open Item Review

IFI 70-1151/2005-202-02

This item tracks long-term improvement of the criticality alarm system, including correction of current audibility problems. During a previous inspection, the licensee had proactively implemented a compensatory measure to address the audibility problem consisting of announcing criticality alarms on the public address system. The inspectors had previously noted that the criticality alarm test procedure was updated. During this inspection the inspectors determined that the licensee has completed the criticality alarm system audibility upgrade survey and no further system changes are planned. This item is closed.

IFI 70-1151/2006-201-01

This item tracks analysis and testing of the automated moisture sampler along with incorporation of any required changes to the accident sequence in the ISA. The licensee indicated that an automated sampling system is in place in one ADU line, has been tested, passed quality control, and is approved for use. During this inspection, the

inspectors noted that the licensee has completed design and testing of the moisture sampler and is in the process of completing installation. This item is closed.

IFI 70-1151/2006-202-02

This item tracks licensee actions to clarify spacing requirements for floor storage of favorable geometry containers. These actions included drafting a new CSE to clarify spacing requirements for favorable geometry process containers used for floor storage of fissile material. During the current inspection, the inspectors reviewed CSE-16-F, Rev.0, "Criticality Safety Evaluation for Floor Storage of Special Nuclear Material," which covers the staging of material removed from processes in the chemical area. (Equipment used for decontamination and clean-up, such as favorable geometry mop buckets, are covered by another CSE.) The inspectors determined that the newly issued CSE-16-F limits the floor storage equipment to 55-gallon drums and "cream cans." 55-gallon drums with less than 800g U²³⁵ may be stored without spacing restrictions; drums with greater than 800g U²³⁵ are required to be staged with an edge-to-edge spacing of at least 18-inches. Cream cans are being redesigned to incorporate fixed spacing rings ("birdcage"-design) and will therefore not require any administrative spacing controls. The inspectors had no safety concerns regarding these spacing requirements. This item is closed.

IFI 70-1151/2006-202-03

This item tracks the licensee's commitment to draft a new cleaning and decontamination CSE to clarify the spacing requirements related to containers such as mop buckets. During this inspection, the inspectors observed the use of mop buckets with drilled holes to limit the depth of solution to less than a safe slab, during facility walk-downs. The licensee indicated that it had not yet implemented a decontamination CSE to address this IFI. The reason for this is that operations was not satisfied with the limited quantity of water available in the modified (i.e., with drilled holes) mop buckets. The licensee is therefore re-evaluating whether to use modified mop buckets or cream cans for decontamination. This item remains open.

IFI 70-1151/2006-203-01

This item tracks the licensee's corrective actions for the incinerator blower fire. The fire occurred when a pressure increase in the incinerator caused hot off-gas to penetrate the flame blower and ignite the flame blower filter. The licensee attributed the pressure increase to an automatic interruption in the quench sump tank discharge when uranium content increased beyond discharge limits. The interruption caused an increase in water level in the absorber tank until the incinerator off-gas ceased to flow through the quench tanks. During this inspection, the inspectors reviewed selected aspects of the following documents:

- DWG 304F01P101, "Upgrade Contaminated Waste Incinerator Burner Controls," Revision 15, dated June 5, 2004
- DWG 304F07P102, "Incinerator Offgas, Absorbers, Scrubber," Revision 2, dated June 10, 2004

To avoid an increase in off-gas pressure due to an increase in uranium content, the licensee changed the polishing filters. Since December of 2006, the licensee has evaluated gamma monitor readings to track uranium content levels without identifying any adverse trends. Soluble uranium species are another concern, because these species react inside the incinerator scrubbing system, changing the uranium concentration and because filtration will not affect soluble species. To correct this issue, the licensee plans to install an ion exchange bed in the effluent line to capture the soluble uranium species.

The process control systems have been adequately modified and reviewed and all the alarm conditions have been identified. Instructions for response to alarms to properly shutdown equipment in emergency situations have been implemented. Currently, licensee NCS staff has determined that the set points for the gamma monitors are adequate to protect against accumulation of uranium. Operationally, the licensee will determine if the set points are adequate when the incinerator is restarted. The inspectors determined that the licensee had implemented appropriate corrective actions and has committed to implement additional corrective actions to ensure the safety of the incinerator. This item is closed.

URI 70-1151/2006-205-04

This item tracks the licensee's practices regarding screening and reporting of previously unanalyzed sequences to the NRC as unanalyzed conditions (under paragraph (b)(1) of Appendix A of 10 CFR Part 70). During a previous inspection (70-1151/2006-205), the inspectors had noted that Revisions 0, 1, and 2 of CSE-07-A, "Criticality Safety Evaluation for the Solvent Extraction System," had added four new NCS accident sequences that had not been in the previous version of the CSE. The inspectors had observed that the licensee threshold for reporting a previously unanalyzed accident sequence as an unanalyzed condition is the addition of a new control in order to meet performance requirements. During this inspection, the inspectors reviewed Revision 3 of CSE-07-A, as well as the previous versions, and concluded that the four sequences in question had, in fact, been identified and analyzed in all revisions since initial issue (prior to Revision 0, the criticality safety basis had been documented in ISA 7, "Solvent Extraction System"). The inspectors therefore concluded that no new accident sequences had been introduced. This item is closed.

VIO 70-1151/2007-201-01

This item concerned the failure to implement a replacement component in accordance with the approved configuration management procedure. During a previous inspection, the inspectors had observed a mop bucket in the chemical area with holes near the 5-gallon level that were substantially smaller than the 1-inch holes required by procedure to limit solution volume in chemical area mop buckets to five gallons. The inspectors noted that several different types of mop buckets were in use in the chemical area, that one of the buckets was described as an as-built condition by a configuration controlled drawing which required that 1-inch holes be drilled at the 5-gallon level, and that the other buckets were unapproved replacements. The inspectors determined that the licensee had not followed the configuration management procedure while completing a corrective action resulting in the continued presence of unauthorized mop buckets in the

chemical area. During this inspection, the inspectors determined that all unapproved mop buckets had been removed and that licensee staff routinely checked for nonconforming mop buckets. This item is closed.

6.0 Exit Meeting

The inspectors presented the inspection scope and results to members of the licensee's management and staff during an exit meeting on August 2, 2007. The licensee acknowledged and understood the findings as presented.

SUPPLEMENTARY INFORMATION

1.0 List of Items Opened, Closed, and Discussed

Items Opened

URI 70-1151/2007-202-01	Use of calculations based on facility features that might credibly be changed to demonstrate that criticality accident sequences are not credible.
VIO 70-1151/2007-202-02	Failure to comply with posted limit on moderating materials in a storage array.

Items Closed

IFI 70-1151/2005-202-02	Tracks long-term improvement of the criticality alarm system, including correction of current audibility problems.
IFI 70-1151/2006-201-01	Tracks analysis and testing of the automated moisture sampler along with incorporation of any required changes to the accident sequence in the ISA.
IFI 70-1151/2006-202-02	Tracks completion and implementation of the new floor storage CSE.
IFI 70-1151/2006-203-01	Tracks licensee's corrective actions for the incinerator blower fire.
URI 70-1151/2006-205-04	Tracks the licensee's practices regarding screening and reporting of previously unanalyzed sequences to the NRC as unanalyzed conditions.
VIO 70-1151/2007-201-01	Failure to implement a replacement component in accordance with the approved configuration management procedure.

Items Discussed

IFI 70-1151/2006-202-03	Tracks completion and implementation of the new clean-up and decontamination CSE.
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2.0 Inspection Procedures Used

IP 88015	Nuclear Criticality Safety Program
IP 88016	Nuclear Criticality Safety Evaluations and Analyses

3.0 Partial List of Persons Contacted

Westinghouse Electric Company

R. Winiarski	NCS Manager
D. Graham	NCS Technician
C. Snyder	NCS Technician
D. Precht	Operations Manager
J. Peterson	Maintenance Manager
G. Couture	EH&S Engineer
J. Heath	EH&S Engineer

NRC

D. Morey	Senior Criticality Safety Inspector, NRC HQ
C. Tripp	Criticality Safety Inspector, NRC HQ
C. Román-Cuevas	Chemical Safety Reviewer, NRC HQ

All attended the exit meeting on August 2, 2007

4.0 List of Acronyms

ADAMS	Agencywide Documents Access and Management System
ADU	ammonium diuranate
CFR	Code of Federal Regulations
CSE	criticality safety evaluation
EH&S	environment, health, and safety
IFBA	integral fuel burnable absorber
IFI	inspector follow-up item
IP	inspection procedure
ISA	integrated safety analysis
NCS	nuclear criticality safety
PDR	public document room
URI	unresolved item
VIO	violation
WEC	Westinghouse Electric Company (licensee)