

# UNITED STATES NUCLEAR REGULATORY COMMISSION

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

March 26, 2010

EA 2009-268

Mr. Sean Fuller Chief Operating Officer and Facility Manager Global Nuclear Fuel – Americas, L.L.C. P.O. Box 780, Mail Code J20 Wilmington, NC 28402

SUBJECT: NUCLEAR REGULATORY COMMISSION INSPECTION REPORT

NO. 70-1113/2010-002 AND NOTICE OF VIOLATION

Dear Mr. Fuller:

This refers to the inspection conducted from February 22–26, 2010, at the Global Nuclear Fuel – Americas, L.L.C. (GNF-A) Wilmington, NC facility. 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 on February 26, 2010, the inspectors discussed the findings with members of your staff.

This inspection was an examination of activities conducted under your license as they relate to safety and compliance with the Commission's rules and regulations and with the conditions of your license. Within these areas, the inspection consisted of a selective examination of procedures and representative records, observations of activities, and interviews with personnel. The NRC also considered the information included in your letter dated March 12, 2010. The review of this information is documented in the enclosed inspection report.

Based on the results of this inspection, the NRC has determined that two Severity Level IV violations of NRC requirements occurred. The violations were evaluated in accordance with the NRC Enforcement Policy available on the NRC's Web site at <a href="http://www.nrc.gov/about-nrc/regulatory/enforcement/enforce-pol.html">http://www.nrc.gov/about-nrc/regulatory/enforcement/enforce-pol.html</a>. You may find it helpful to consider the information in NRC Information Notice 96-28, Suggested Guidance Relating to Development and Implementation of Corrective Action, when formulating your reply. The violations are cited in the enclosed Notice of Violation (Notice) and the circumstances surrounding it are described in the NRC Form 591FF, SAFETY AND COMPLIANCE INSPECTION REPORT, Parts 1 and 3. The violations are being cited in the Notice because they were identified by the NRC.

You are required to respond to this letter and should follow the instructions specified in the enclosed Notice 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.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter and its enclosures will be made available electronically for public inspection in the NRC Public

S. Fuller 2

Document Room or from the NRC's document system (ADAMS), accessible from the NRC Web site at <a href="http://www.nrc.gov/reading-rm/adams.html">http://www.nrc.gov/reading-rm/adams.html</a>. To the extent possible, your response should not include any personal privacy, proprietary, or safeguards information so that it can be made available to the Public without redaction. Should you have any questions concerning this letter, please contact us.

Sincerely,

/RA/

Daniel W. Rich, Chief Fuel Facility Inspection Branch 3 Division of Fuel Facility Inspection

Docket No. 70-1113 License No. SNM-1097

Enclosures: 1. Notice of Violation

2. NRC Form 591FF Parts 1 and 3

cc w/encls:

Scott Murray, Manager Facility Licensing Global Nuclear Fuels - Americas, L.L.C. Electronic Mail Distribution

Beverly Hall, Chief Radiation Protection Section N.C. Department of Environmental Commerce & Natural Resources Electronic Mail Distribution S. Fuller 2

Document Room or from the NRC's document system (ADAMS), accessible from the NRC Web site at <a href="http://www.nrc.gov/reading-rm/adams.html">http://www.nrc.gov/reading-rm/adams.html</a>. To the extent possible, your response should not include any personal privacy, proprietary, or safeguards information so that it can be made available to the Public without redaction. Should you have any questions concerning this letter, please contact us.

Sincerely,

#### /RA/

Daniel W. Rich, Chief Fuel Facility Inspection Branch 3 Division of Fuel Facility Inspection

Docket No. 70-1113 License No. SNM-1097

Enclosures: 1. Notice of Violation

3. NRC Form 591FF Parts 1 and 3

cc w/encls:

Scott Murray, Manager Facility Licensing Global Nuclear Fuels - Americas, L.L.C. Electronic Mail Distribution

Beverly Hall, Chief Radiation Protection Section N.C. Department of Environmental Commerce & Natural Resources Electronic Mail Distribution

\*See previous concurrence

oxdiv Publicly available oxdiv Non-Publicly available oxdiv Sensitive oxdiv Non-Sensitive

ADAMS: ☑ Yes ACCESSION NUMBER:\_\_\_\_\_ ☑ SUNSI REVIEW COMPLETE

OFFICE	RII:DFFI	RII:DF	-1	RII:DFFI		RII:DFFI		RII:DFFI					
SIGNATURE	/RA/	/RA by	/RA by RGibson/		/RA/		/RA by RGibson/		/RA/				
NAME	OLopez	opez CCramer		JFoster		PStartz		RGibson					
DATE	3/23/2010	3/23	3/23/2010		3/23/2010		3/23/2010		3/23/2010		/2010	3/	/2010
E-MAIL COPY?	YES N	O YES	NO	YES	NO	YES	NO	YES	NO	YES	NO	YES	NO

# NOTICE OF VIOLATION

Global Nuclear Fuel - Americas, L.L.C. Wilmington, NC

Docket No. 70-1113 License No. SNM-1097

During an NRC inspection conducted February 22-26, 2010, two violations of NRC requirements were identified. In accordance with the NRC Enforcement Policy, the violations are listed below:

A. 10 CFR Part 70, Appendix A section (b)(2) states, in part, that a report must be made to the NRC Operations Center within 24 hours of discovery, of the loss or degradation of items relied on for safety that results in failure to meet the performance requirement of 10 CFR 70.61.

10 CFR 70.61(b) states, in part, that engineered controls, administrative controls, or both, shall be applied to the extent needed to reduce the likelihood of occurrence of the event so that, the event is highly unlikely or its consequences are less severe than those in paragraphs (b)(1)(4) of this section. Paragraph (b)(1) describes a high consequence event that result in an acute worker dose of 1 Sv (100 rem) or greater total effective dose equivalent.

Contrary to the above, on January 26, 2010, the licensee failed to report within 24 hours of discovery, a loss or degradation of an item relied on for safety that resulted in the failure to meet the performance requirement of 10 CFR 70.61(b). Specifically, a safe geometry gad slugger hood feed tube (IROFS 30206) failed to perform its intended safety function. This increased the likelihood of a high consequence accident scenario, "Loss of moderation and geometry control," from highly unlikely to unlikely, and therefore a report to the NRC Operations Center within 24 hours of discovery was required.

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

B. Safety Condition No. S-1 of Special Nuclear Material License No.1097 requires that material be used in accordance with statements, representations, and conditions of application dated June 5, 1997 and December 7, 1999; and supplements thereto.

Section 7.7.1 of the Licensee Application states that areas where fire or explosion hazards are present, automatic detection equipment is installed.

Contrary to the above, as of February 26, 2010, the licensee failed to install automatic detection equipment in areas where fire or explosion hazards were present. Specifically, fire hazards (i.e. combustible materials) were present in the Process Technology laboratory area and automatic detection equipment was not installed.

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

S. Fuller 2

Pursuant to the provisions of 10 CFR 2.201, Global Nuclear Fuel - Americas, L.L.C., is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555-0001 with a copy to the 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 violations, or, if contested, the basis for disputing the violations or severity level; (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 a Demand for Information may be issued as to why the license should not be modified, suspended, or revoked, or why such other action as may be proper should 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, with the basis for your denial to the Director, Office of Enforcement, United States Nuclear Regulatory Commission, Washington, DC 20555-0001.

Because 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 <a href="http://www.nrc.gov/reading-rm/adams.html">http://www.nrc.gov/reading-rm/adams.html</a> 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 basis 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 2.390(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 26th day of March 2010

NRC FORM 591FF PART 1 (12-2007)				U.S. NUCLEAR RE	EGULATORY COMMISSION			
10 CFR 2.201	INSPECTION	ON REF	PORT					
1. LICENSEE OR CERTIFICATE HOL Global Nuclear Fuels - Amer P.O. Box 780 Wilmington, NC 28402	DER/LOCATION INSPECTED: ricas, L.L.C.	NRC/REGIONAL OFFICE:     U.S. Nuclear Regulatory Commission     Region II     61 Forsyth Street, Suite 23T85						
REPORT NO:	2010-002	Atlanta, GA 30303-8931						
3. DOCKET NUMBER: 70-1113	4. LICENSE OR CERTIFIC SNM-		IBER:	5. DATE(S) OF INSPECTION February 22, 2010 – F				
LICENSEE OR CERTIFICATE	HOLDER:							
The inspection was an examination safeguards and to compliance with or certificate. The inspection cons and observations by the inspector.	n the Nuclear Regulatory Commis isted of selective examinations o The inspection findings are as f	ssion (NF f procedu follows:	RC) rules and regures and regerese	gulations and the condition	ns of your license			
·	ction findings, no violations	were ic	ienunea.					
<ul><li>2. Previous violation(s)</li></ul>	2. Previous violation(s) closed.							
3. Reported events rev	□ 3. Reported events reviewed							
cited because they were remaining criteria in the	ecifically described to you b e self-identified, non-repeti e NRC Enforcement Policy, vas/were discussed involvi	tive, an to exer	d corrective a cise discretio	ction was or is being n, were satisfied.	taken, and the			
		is a NC	TICE OF VIC					
LICENSEE OR CER	RTIFICATE HOLDER STATEMENT of the actions described by me to							
statement of corrective actions is n steps which will be taken, date who required, unless specifically reques	nade in accordance with the requent full compliance will be achieve sted.	uirements	of 10 CFR 2.20	1 (corrective steps alread	y taken, corrective			
Title	Printed Name			Signature	Date			
LICENSEE/CERTIFICATE HOLDER REPRESENTATIVE	/RA/				3/23/2010			
NRC INSPECTOR López, Cramer, Fos		artz						

NRC FORM 591FF PART 3 U.S. NUCLEAR REGULATORY COMMISSION

(12-2007) 10 CFR 2.201

#### INSPECTION REPORT

1. LICENSEE OR CERTIFICATE HOLDER/LOCATION INSPECTED:

Global Nuclear Fuels - Americas, L.L.C.

P.O. Box 780

REPORT NO:

Wilmington, NC 28402

2010-002

2. NRC/REGIONAL OFFICE:

U.S. Nuclear Regulatory Commission

Region II

61 Forsyth Street, Suite 23T85

Atlanta, GA 30303-8931

4. LICENSE OR CERTIFICATE HOLDER NUMBER: 3. DOCKET NUMBER: 5. DATE(S) OF INSPECTION:

> 70-1113 SNM-1097 February 22, 2010 - February 26, 2010

6. INSPECTOR(S): Omar López, Chad Cramer, Paul Startz, Jennifer Foster

7. INSPECTION PROCEDURES USED: 88020, 88054, and 88055

#### **EXECUTIVE SUMMARY**

# Summary of Plant Status

The Global Nuclear Fuels Americas L.L.C (GNF-A) facility converts uranium hexafluoride into uranium dioxide and fabricates fuel assemblies for use in commercial nuclear power reactors. During the inspection period, normal production activities were ongoing. This routine, announced inspection evaluated plant operations and the fire protection program. The inspection involved observation of work activities, a review of selected records, and interviews with plant personnel. The inspection identified the following aspects of the licensee programs as outlined below:

# Plant Operations (88020)

- The inspectors verified that items relied on for safety (IROFS) in the conversion area were available to perform their intended safety function. The inspectors also reviewed functional tests for the IROFS and reviewed other management measures to ensure the IROFS were reliable. No significant issues were identified.
- The inspectors reviewed the licensee's investigation of a uranium powder spill which occurred in a moderator restricted area (MRA). The licensee had analyzed the spill in a Nuclear Safety Release/Requirements (NSRR) document. The inspectors also reviewed the licensee's TapRoot™ Investigation Report. The inspectors did not find any significant issues with the licensee's investigation into the spill of powder.
- The inspectors reviewed event notification (EN) 45717, Unanalyzed Condition Incomplete List Of Safety Controls in Integrated Safety Analysis Summary. The licensee added five additional IROFS for two accident scenarios, related to the release of hydrogen fluoride (HF) to the environment between the HF Building and the dry conversion process (DCP) building. The inspectors reviewed the IROFS (three administrative, one passive engineered control, and one active engineered control) to ensure they were implemented so that they were available and reliable to perform their intended safety function. The inspectors observed the licensee's performance of a functional test for the active engineered control. No significant issues were identified. This issue is related to previous inspection findings for which enforcement action, under EA 2009-268, is still being evaluated. EN 45717 remains open as the licensee may add additional observations from ongoing reviews.
- The inspectors reviewed the licensee's IROFS in the conversion area to determine if the licensee had addressed credible accident scenarios related to conversion area equipment. No significant issues were identified.

- The inspectors reviewed the licensee's IROFS related to the licensee's computer programs which ensures that powder does not contain excessive moderator. No significant issues were identified.
- The inspectors observed a routine nuclear criticality safety audit performed by the licensee. No significant issues were identified.
- The inspectors reviewed an incident where the licensee determined that a safe geometry IROFS had failed. During the incident involving IROFS 30206, "Slugger Hood Geometry", the tube which connects the feeder station and the slugger became misaligned from its source. The misaligned feed tube spilled approximately 7 kilograms of uranium powder into an unfavorable geometry enclosure. Due to the loss of favorable geometry control, a significant amount of uranium powder spilled into the unfavorable geometry hood. Node 42.3 of the Integrated Safety Analysis (ISA) Summary, defines the hazard as a criticality. Without IROFS 30206 in place, a high consequence event was no longer highly unlikely and therefore, the licensee was not meeting the performance requirement of 10 CFR 70.61(b).

The inspectors reviewed the licensee's letter dated March 12, 2010, regarding the licensee's evaluation of the reportability of the event. In the letter, the licensee stated that in order for the IROFS to have completely failed to perform its intended safety function, the tube would have had to have been completely misaligned, allowing the entire contents to be discharged into the enclosure. The licensee stated the IROFS was not failed, but was degraded. The licensee stated the IROFS was still able to perform its safety function long enough for the operator to shut the equipment down and stop the event.

The NRC does not agree with the licensee's assessment. The licensee asserted that due to rapid actions on the part of the operator, the equipment was in operation for a short period of time, apparently less than ten minutes. However, the degraded condition of the tube still allowed approximately 7 kg of material to escape. Therefore, a delay on the part of the operator in shutting down the equipment would have allowed the contents to be discharged into the hood. If the feed tube had been able to perform its safety function of maintaining safe geometry, it would not have allowed bulk quantities of material to escape into the hood. Additionally, although fortunate that the operator took appropriate action, the licensee's safety analysis does not include any description of operator action as a safety control or an IROFS. Therefore, in terms of meeting the performance requirement of 10 CFR 70.61(b), no credit can be assumed for operator action to compensate for a failed IROFS.

10 CFR 70, Appendix A(b)(2) states that the licensee shall report to the NRC, within 24 hours of discovery, a loss or degradation of items relied on for safety that results in failure to meet the performance requirement of 10 CFR 70.61. Failure to report to the NRC a loss of IROFS that results in failure to meet the performance requirement of 10 CFR 70.61 is considered a violation of NRC requirements (VIO 70-1113/2010-002-01).

#### Fire Protection (88054 and 88055)

- The inspection focused on the Dry Conversion Process, Ceramic Process, storage areas, and the incinerator building.
- The inspectors reviewed a sample of fire extinguishers and fire hose reels located throughout the facility. The inspectors determined that the sampled fire extinguishers were tested and spaced in accordance with National Fire Protection Association (NFPA) 10 and the fire hose reels were tested in accordance with NFPA 25. The extinguishers sampled were properly rated for the hazards present in the areas. The inspectors determined that both the extinguishers and the fire hose reels sampled were accessible and in adequate material condition.

- The inspectors reviewed an independent audit of the fire protection program and verified that adequate corrective actions were identified for issues identified during the audit.
- The inspectors verified the storage of flammable materials in marked cabinets as specified in approved procedures. The inspectors verified that housekeeping and the control of combustible materials were adequate and consistent with the approved procedures. No significant issues were identified.
- The inspectors reviewed a sample of hot work permits and procedure changes regarding the hot work control program. The inspectors determined that the permits were in accordance with approved procedures and that the procedural changes were conservative and maintained the safety program requirements.
- The inspectors reviewed the pre-fire plans which had recently been revised. The inspectors verified that the pre-fire plans contained sufficient information to support the response of the facility's emergency response team and offsite fire department. No issues of significance were identified.
- The inspectors reviewed training class and drill attendance sheets from 2009 and verified the Emergency Response Team members received training and participated in drills on at least an annual basis. The inspectors verified that the offsite fire support organizations were offered an opportunity for site orientation. The inspectors observed an Emergency Response Team training class and reviewed the inventory of a fire truck. The inspectors did not note any issues with the communication equipment and verified that the members of the Emergency Response Team had access to their own portable radio communications while they were on duty. No significant issues were identified.
- The inspectors verified, with one exception, that sprinklers systems were not obstructed, that water supply to the system was readily available with correct valve positioning and pumping capability, and that there was not visual evidence of physical degradation. The inspectors verified that sprinkler systems complied with the design requirements of NFPA 13.
  - However, during the walk down of the sprinkler system in the pellet press process area, the inspectors identified four sprinklers that appeared to be blocked by ventilation ducts near the furnace area. The inspectors determined that the sprinkler system in the pellet press area was not in compliance with the requirements of NFPA 13 regarding obstruction to sprinkler discharge and spray pattern development. In response to the inspectors' concerns, the licensee will perform an evaluation of the sprinkler system in the pellet press process area. Section 7.8 of the License Application states that GNF-A's fire protection system is designed in accordance with the applicable NFPA. NFPA 13, Standard for the Installation of Sprinkler Systems, requires that sprinklers shall be installed under fixed obstructions over 4 ft wide such as ducts, decks, open grate flooring, cutting tables, and overhead doors. This issue will be tracked as unresolved item (URI 70-1113/2010-02-02) pending the review of the licensee evaluation of the sprinkler heads in the pellet press area.
- The inspectors verified that the inspection, testing, and maintenance (ITM) of the sprinkler systems complied with the requirements of NFPA 25. No significant issues were identified.
- The inspectors verified that smoke and heat detectors were clear of any interference that could impact the
  device functionality. The inspectors also verified that detectors were installed, and ITM was performed in
  accordance with NFPA 72. No significant issues were identified.
- The inspectors walked down plant areas where fire or explosion hazards were present to verify that
  these areas have adequate fire detection. The inspectors noted that the licensee stored radioactive
  materials in the Process Technology Laboratory (PTL) area where fire hazards (i.e. combustible

materials) were present. The inspectors noted that the PTL area did not have fire detection installed. Further inspection revealed there were sprinklers installed in the PTL but the system was physically disconnected from the building sprinkler system. Section 7.7.1 of the Licensee Application states that areas where fire or explosion hazards are present, automatic detection equipment is installed. The failure to install automatic detection equipment in the PTL area where fire hazards were present was considered a violation of NRC requirements, VIO 70-1113/2010-02-03. As a corrective action, the licensee developed a plan to reconnect the sprinklers located in the PTL area to ensure that automatic detection was available in the area.

- The inspectors conducted walk downs of fuel production areas and the incinerator building to evaluate the presence, condition, and effectiveness of passive fire protection features. Passive fire protection features included properly maintained fire walls, properly sealed penetrations through fire walls, properly maintained fire doors, and the presence of fire dampers in ducting that passes through fire walls. The inspectors also compared as-installed protective features to as-built building drawings and component specifications. No findings of significance were identified.
- The inspectors reviewed samples of preventative maintenance activities associated with the periodic inspection and functional testing of passive fire protection systems, features, and equipment.
   Documentation reviews included: (a) annual inspections of fire dampers in the DCP building; (b) two examples of quarterly inspections of fire doors; (c) annual functional tests for all DCP fire doors; and (d) triennial inspections of DCP fire walls. No findings of significance were identified.
- The inspectors performed walk downs of fuel manufacturing areas and the incinerator building to evaluate the adequacy, condition, and effectiveness of emergency lighting relative to the requirements of NFPA 101, Life Safety Code, Chapter 7. Inspectors noted that emergency lights in the incinerator building had been recently replaced with new wall mounted battery-pack units. The positions and quantities of emergency lights provided significant assurance that the lighting would support safe egress from all portions of the incinerator building. No findings of significance were identified in the incinerator building.

The inspectors discovered that at least eight emergency lighting fixtures in the DCP building were inoperative. Emergency lighting fixtures in the DCP building were similar to some general lighting fixtures within the building and were not labeled or otherwise identified as emergency lighting. Licensee personnel appeared to be unaware of which lighting fixtures were emergency fixtures, where the fixtures were located, and how they functioned. NFPA 101, Chapter 7.9 requires monthly 30-second functional testing, annual 90-minute functional testing, functional testing of generators that power emergency lighting, and required record keeping. The inspectors determined that there was no established functional testing of the emergency lighting systems in the DCP. In response, a licensee engineer reviewed building drawings and determined that one grid of emergency lights was powered by a battery backup system, and another grid was powered by a generator. As a result of the findings, the licensee committed to repairing all emergency lighting and would establish functional testing in accordance with NFPA 101. In addition, the licensee committed to confirming the locations and adequacy of emergency lighting fixtures, labeling the fixtures, and performing functional testing of all backup lighting systems during an upcoming power outage.

The inspectors evaluated additional fuel production areas for compliance with emergency lighting and egress routes as required by NFPA 101. Inspectors were unable to identify adequate emergency lighting in the six areas listed below and requested the licensee follow-up and determine the status of these issues. The press room and the egress route through the press room did not appear to have any identifiable emergency lighting fixtures. In response, the licensee reviewed documentation and concluded there were some building lighting fixtures that were connected to a backup generator, and

that the system will be evaluated during an upcoming power outage. The laundry and the egress path through the laundry did not appear to have any identifiable emergency lighting fixtures. In response, the licensee reviewed documentation and concluded the situation would be evaluated during an upcoming power outage. The status indicating pilot lights on four out of five emergency lighting fixtures in the sintering furnace room suggested the fixtures were in a degraded condition. In response, the licensee retested the battery-pack emergency lighting and determined they were operational, and that the defective status lights would be repaired. The stairway from the sintering furnace room mezzanine to the press room did not have any identifiable emergency lighting fixtures. In response, the licensee concluded the situation would be evaluated during an upcoming power outage. The final weld production area and the evacuation path through the final weld area did not have any identifiable emergency lighting fixtures. In response, the licensee concluded the situation would be evaluated during an upcoming power outage. The established evacuation route through the old conversion calciner area did not have adequate identifiable emergency lighting fixtures over most of the route with only one relevant fixture near the waste area. In response, the licensee reviewed documentation and concluded there was a number of building emergency lighting fixtures powered by a backup generator, the system will be evaluated during an upcoming power outage, and periodic testing will be established.

In response to the inspectors' concerns, the licensee immediately developed a repetitive work instruction to identify and repair all emergency light fixtures in the DCP. The licensee also committed to evaluating the presence and adequacy of all emergency lighting within the production complex during an upcoming plant shutdown and power outage. The power will be disconnected allowing personnel to locate existing fixtures and evaluate the adequacy of all emergency lighting. Chapter 7.0, Fire Safety of the License Application states that GNF-A's fire protection strategy is achieved by appropriate combinations of fire prevention measures and response systems, that are designed and maintained in accordance with federal, state, and local codes. NFPA 101, Life Safety Code, Chapter 7.8 and 7.9 requires the presence and documented maintenance of adequate emergency lighting to allow safe egress from buildings. These issues will be tracked as an unresolved item (URI 70-1113/2010-02-04) pending the licensee's evaluation of the presence and adequacy of emergency lighting.

# Exit Meeting Summary

The inspection scope and results were summarized on Friday, February 26, 2010, with Sean Fuller, and members of his staff. The inspectors asked the licensee staff whether any materials examined during the inspection should be considered proprietary. No proprietary information was identified.

#### **Key Points of Contact**

<u>Name</u> <u>Title</u>

E. Anderson Manager, Emergency Preparedness and Site Security

D. Bianco Fire Safety & Emergency Coord. Res.

C. Bough Manager, PP&SS
G. Dickman Manager, FAB

S. Fuller GNF-A Chief Operating Officer, Facility Manager

S. Murray
Manager, Licensing and Liabilities
J. Reeves
Manager, Integrated Safety Analysis
J. Zino
Manager, GNF-A Criticality Safety

# List of Items Opened, Closed, Discussed

<u>Item Number</u> VIO 70-1113/2010-002- 01	<u>Status</u> OPEN	<u>Description</u> Failure to report to NRC in accordance with Appendix A to 10 CFR 70 section (b)(2), failure or degradation of an item relied on for safety that results in a failure to meet the performance requirements of §70.61.
URI 70-1113/2010-002- 02	OPEN	Review licensee's evaluation of the sprinkler heads in the pellet press area.
VIO 70-1113/2010-002- 03	OPEN	Failure to install automatic detection equipment in the PTL area.
URI 70-1113/2010-002- 04	OPEN	Failure to meet emergency lighting requirements in accordance with NFPA 101, Life Safety Code.
EN 45717	DISCUSSED	Unanalyzed Condition - Incomplete List Of Safety Controls in Integrated Safety Analysis Summary.