



**Global Nuclear Fuel**

A Joint Venture of GE, Toshiba, & Hitachi

**Global Nuclear Fuel**

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March 1, 2013

U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555-0001

Attn: Document Control Desk

Subject: 30-day Report of Event – Completion of ISA Action Plan Balance of Plant (BOP) Milestone

References:   1) NRC License SNM-1097, Docket 70-1113  
                  2) Letter S. P. Murray to M. N. Baker, GNF-A Request to Reschedule BOP  
                      Milestone, 12/6/12  
                  3) GNF-A Event Report 48709, 1/31/13

Dear Sir or Madam:

In accordance with 10CFR70.50(c)(2), Global Nuclear Fuel – Americas L.L.C. (GNF-A) hereby submits the 30 day follow-up report to Event Notification 48709, which was provided on January 31, 2013 (Reference 3). As discussed in the event report, GNF-A reported completion of the Integrated Safety Analysis (ISA) third action plan interim milestone. Consistent with 10CFR70.50(c)(1), a facsimile was submitted on January 31, 2013 providing additional information and is included as an attachment to this letter.

**Event Details and Safety Significance**

In response to a Notice of Violation (NOV) in 2010, Global Nuclear Fuels – America (GNFA) committed to perform a review of the existing Integrated Safety Analysis (ISA). An ISA Action Plan and schedule for performing the ISA review was described in GNF-A's response to the NOV and the third interim milestone (balance of plant) was scheduled for completion by December 31, 2012. This milestone was subsequently extended by approximately 30 days (Reference 2).

On 1/30/13, GNF-A completed the ISA review for the BOP areas and identified an additional 110 items relied on for safety (IROFS) which were existing safety controls for these areas. Implementation of the revised safety basis, IROFS and application of management measures to the new IROFS will be completed within 60 days per the current ISA Action Plan.

Because the revised ISA has designated existing safety controls as additional IROFS, GNF-A made a report of this completion within 24 hours pursuant to the reporting requirements of 10CFR70 Appendix A(b)(1).

**Probable Cause**

Programmatic weaknesses in the GNF-A ISA implementation and documentation were identified during NRC inspections. GNF-A acknowledged these deficiencies and developed actions to correct the identified issues.

**Near-term Corrective Actions Taken**

GNF-A initiated comprehensive actions to (1) ensure that appropriate compensatory measures exist and to correct the identified programmatic deficiencies to ensure adequate protection of workers, the public, and the environment and (2) address inconsistencies identified in the application of the ISA methodology.

GNF-A confirmed that double contingency (i.e., at least two unlikely, independent, and concurrent changes in process conditions must occur before a criticality accident is possible) exists as the basis of ongoing facility safety by confirming that current criticality safety analyses exist for fissile material processes.

GNF-A developed, reviewed, and approved a comprehensive ISA action plan and schedule to address the identified programmatic ISA issues.

**Longer-term Preventive Actions**

The ISA action plan not only addresses the items identified in the 2010 violations but also provides an opportunity to ensure that other programmatic issues are identified and addressed, and allows GNF-A to incorporate quantitative elements into the methodology.

A schedule was developed for a timely program review of material processes and this review continues. The schedule includes a phased implementation approach to bring the program into full compliance with the license and regulations. The ISA review is being performed in accordance with the revised schedule discussed with the Staff in a public meeting on April 27, 2011 and the revised schedule detailed in Reference 2.

GNF-A will continue to apprise the NRC of the status and results of the ISA evaluations through periodic meetings and site visits. GNF-A will provide the NRC a listing of all controls re-designated as IROFS in accordance with the phased implementation schedule shown in Reference 2.

If you have any questions regarding this matter, please contact me at (910) 819-5950.

Sincerely,



Scott Murray, Manager  
Licensing & Liabilities

Commitments: Stated above

Attachment 1: Event description

cc: NRC Region II Administrator, Atlanta, GA  
M. Sykes, NRC RII Atlanta. GA  
M. L. Thomas, NRC RII Atlanta. GA  
M.N. (Nick) Baker, NRC NMSS, Washington, DC

**Attachment 1**  
Event Description

Completion of ISA Action Plan BOP Milestone

In response to a Notice of Violation (VIO 70-1113/2010-003), Global Nuclear Fuel – Americas, LLC (GNF-A) committed to perform a review of the existing Integrated Safety Analysis (ISA). An ISA Action Plan and schedule for performing the ISA review was described in GNF-A's response to the NOV and the third milestone (balance of plant) was scheduled for completion by January 31, 2013.

On January 30, 2013, GNF-A completed the ISA reviews for the balance of plant and has identified an additional 110 items relied on for safety (IROFS) for these areas which were existing safety controls. Implementation of the revised safety basis, IROFS and application of management measures to the IROFS will be completed by March 31, 2013 per the current ISA Action Plan schedule.

Because the revised ISA has designated existing safety controls as additional IROFS, GNF-A is making a report of this completion pursuant to the reporting requirements of 10CFR70 Appendix A(b)(1) within 24 hours.

Scott Murray,  
Manager, Facility Licensing  
1400 1/31/2013