



Global Nuclear Fuel

A Joint Venture of GE, Toshiba, & Hitachi

Global Nuclear Fuel

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SPM 13-028

May 24, 2013

US Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555-0001

Subject: Reply to a Notice of Violation

References: 1) SNM-1097, Docket 70-1113
2) GNF-A 30 Day Report of Event – Chemet Lab Hydrogen Supply Piping System, 12/7/12
3) NRC Inspection Report No. 70-1113/2013-002 and Notice of Violation, 4/25/13

Dear Mr. Sykes:

Attached to this letter is Global Nuclear Fuel – Americas, LLC's (GNF-A) response to the Notice of Violation described in Reference 3.

Please contact me at (910) 819-5950 if you have any questions or would like to discuss this matter further.

Sincerely,

A handwritten signature in black ink that reads 'Scott Murray'.

Scott Murray, Manager
Facility Licensing

Commitment: Complete additional long term preventive action by 5/31/13

Attachment: GNF-A response to violation

cc:

V. M. McCree, NRC Regional Administrator, Region II Atlanta
M. L. Thomas, NRC Region II, Atlanta
R. Johnson, NRC NMSS, Washington, D.C.
T. D. Naquin, NRC NMSS, Washington, D.C.
L. Cox, NCDHSR

Attachment

The information provided below summarizes the Notice of Violation 01 dated April 25, 2013 associated with NRC Inspection Report 70-1113/2013-002

VIOLATION NO. 2013-002-01

During an NRC inspection conducted between January 1 and March 30, 2013, a violation of NRC requirements was identified. In accordance with the NRC Enforcement Policy, the violation is listed below:

Safety Condition S-1 of Special Nuclear Material (SNM) License 1097 requires that material be used in accordance with statements, representations, and conditions of application dated and supplements dated April 2, 2007; June 29, 2007; February 14, 2008; November 25, 2008; January 8, 2009; August 13, 2010; and December 2, 2010.

Section 11.2.1 of the License Application for License SNM-1 097 states, in part, that GNF-A commits to maintain a formal configuration management process, governed by written, approved practices, and ensures that plant design changes do not adversely impact safety, health, or environmental protection programs at GNF-A. Prior to implementing a change the impacts or modifications to the Integrated Safety Analysis (ISA) or ISA Summary are addressed.

Contrary to the above, on April 2011, the licensee implemented a plant configuration change to realign hydrogen gas to the Chemet Lab which resulted in an unanalyzed condition. As a result of the action, the licensee failed to meet the requirements of 10 CFR 70.72.

This is a Severity Level IV violation (Section 6.2).

GNF-A's Response to Violation:

GNF-A does not contest the violation.

As part of the ongoing GNF-A review of its FMO Integrated Safety Analysis (ISA), accident sequences associated with the balance of plant were being evaluated. As part of that evaluation, facility walk downs of the hydrogen supply piping were performed that identified a configuration in the chemical/metallurgical laboratory (Chemet lab) area that may have had inadequate leak protection measures. Based on a review of this as-found condition, it was determined at approximately 11AM on November 9, 2012 that the existing system was inadequately analyzed in the ISA and this condition resulted in a failure to meet performance requirements. Consistent with 10CFR70 Appendix A(b)(1), the discovery was then reported to the NRC within 24 hours.

1) The reason for the violation

An investigation determined that the probable causes of the event were:

- The identified portion of the hydrogen supply piping system had been inactive since August 2011 and was put back into service in April 2012; therefore, a large gap in time occurred between the two actions.
- At the time the system was put back into service, there was inadequate communication to the affected area manager regarding the lab hydrogen supply requirements. As a result, adequate leak protection measures were not identified and implemented at that time for the Chemet lab process area.

2) Short term corrective actions taken

- The hydrogen gas flow to the affected piping system for the laboratory was valved out on November 8, 2012.
- A review team performed a walk down of other laboratory area hydrogen supply piping systems on November 9, 2012 and no other issues or affected areas were identified with inadequate leak protection measures.
- The event was reported to the NRC Operations Center on November 9, 2012 (EN 48497).

3) Longer term preventive actions

1. Perform additional walk downs of FMO hydrogen supply piping to confirm there are no similar conditions in other inactive portions of a system.

Completed – April 5, 2013

2. Perform additional analysis and provide adequate controls for using the hydrogen supply system in the Chemet Lab processing area.

Completed – April 10, 2013

3. Update internal configuration control procedures to provide a more stringent review of gas utilities (e.g. hydrogen) supply piping or valve changes that impact adjacent process areas (other than routine maintenance).

Scheduled completion – May 31, 2013

4) The date when full compliance will be achieved

Full compliance has been achieved. A longer term preventive action has been scheduled.