



**babcock & wilcox nuclear operations group**

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May 8, 2015  
15-052

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

Reference: (1) License SNM-42, Docket 70-27  
(2) Letter dated March 20, 2015, Burch (B&W) to Lesser (NRC), 60 Day Written Report for Event Number 50776  
(3) Letter dated March 30, 2015, Lesser (NRC) to Burch (B&W), Babcock & Wilcox Nuclear Operations Group, Inc. - Nuclear Regulatory Commission Inspection Report Number 70-27/2015-006  
(4) RAI mailed to Marvin Sykes, CRD, 3/30/15,

- NCS Technical Work Record – NCS-2015-017, NCS Safety Analysis for Solids Accumulations in the Low Level Dissolver (LLD) Hood Catch Tray
- OP-0061141, Low Level Dissolver Hood Operation
- B&W Response to NRC Low Level Dissolver Questions

(5) RAI mailed to Marvin Sykes, CRD, 4/17/15,

- NCS Technical Work Record, NCS-2015-011, Revised Safety Concern Analysis for Cleanup Piles in LLD Enclosure that were Larger than 2.5l

Subject: Response to Apparent Violations in Inspection Report No. 70-27/2015-006

Dear Sir or Madam:

B&W Nuclear Operations Group-Lynchburg (NOG-L) is providing written response to the Apparent Violations (AV) in Inspection Report No. 70-27/2015-006 (Reference 3). The response to the AVs is provided in the Enclosures 1 and 2. The response to the AVs was originally due on April 29, 2015; however, the NRC granted an extension until May 8, 2015 via email correspondence between Tony England of B&W and Mark Lesser of the NRC on April 28<sup>th</sup>. The extension was necessary to address comments from the NRC staff received during a phone call on April 28, 2015.

B&W NOG-L acknowledges that the violations existed as stated in the NRC Apparent Violations. Provided within Enclosure 1 is an explanation for the Apparent Violation AV 70-27/2015-006-01 and a status of planned and completed corrective actions. Our explanation of the violation also includes a risk assessment performed in accordance with NRC Inspection Manual Chapter 2606, *Assessment of the Change in Risk Resulting from a Violation at a Fuel Cycle Facility*. If the NRC disagrees with our risk assessment of the violation, Enclosure 1 includes a Request for Enforcement Consideration in which B&W NOG-L requests that the NRC apply a risk informed approach in their evaluation of the appropriate enforcement action. Provided in Enclosure 2 is an explanation for the Apparent Violation AV 70-27/2015-006-02 and a status of planned and completed corrective actions.

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If you have questions or require additional information, please contact Tony England, Manager of Licensing and Safety Analysis, at [caengland@babcock.com](mailto:caengland@babcock.com) or 434-522-6405.

Sincerely,

A handwritten signature in black ink, appearing to read "B. Burch", with a stylized flourish at the end.

B. Joel Burch  
Vice President and General Manager  
Babcock & Wilcox Nuclear Operations Group, Inc. – Lynchburg

Enclosure

cc: NRC, Region II  
NRC, Resident Inspector  
NRC, M. Baker