UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
245 PEACHTREE CENTER AVENUE NE, SUITE 1200
ATLANTA, GEORGIA 30303-1257

January 26, 2017

Dr. Ronald J. Land
Site Manager
AREVA, Inc.
2101 Horn Rapids Road
Richland, WA 99354-0130

SUBJECT: AREVA NP, INC. (RICHLAND) – NUCLEAR REGULATORY COMMISSION INTEGRATED INSPECTION REPORT 70-1257/2016-005

Dear Dr. Land:

The Nuclear Regulatory Commission (NRC) conducted an announced, routine inspection from October 31 through November 3, 2016, at the AREVA NP, Inc., facility in Richland, Washington. The purpose of this inspection was to perform routine reviews of the emergency preparedness, fire protection (annual), maintenance and surveillance, and operational safety programs. The enclosed report presents the results of the inspection. At the conclusion of the inspection, the results were discussed with members of your staff at an exit meeting held on November 3, 2016.

During the inspection, NRC staff examined activities conducted under your license, as they related to public health and safety, to confirm compliance with the Commission's rules and regulations and with the conditions of your license. The inspection consisted of facility walk downs, selective examinations of relevant documents, interviews with plant personnel, and observations of activities. Based on the results of this inspection, no violations of NRC requirements were identified.

In accordance with Title 10 of the *Code of Federal Regulations* 2.390 of NRC's "Rules of Practice and Procedure," a copy of this letter and its enclosure will be made available electronically for public inspection in the NRC Public Document Room or from the NRC's Agencywide Documents Access and Management System (ADAMS), which is accessible from the NRC Website at http://www.nrc.gov/reading-rm/adams.html.

If you have any questions, please contact Noel Pitoniak of my staff at 404-997-4634.

Sincerely,

/RA/

Eric C. Michel, Chief
Projects Branch 2
Division of Fuel Facility Inspection

Docket No. 70-1257
License No. SNM-1227

Enclosure:
NRC Inspection Report 70-1257/2016-005
w/Supplemental Information

cc: (See page 3)

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DATE	1/26/2017	1/26/2017	1/26/2017	1/26/2017	1/26/2017		
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cc:
Calvin D. Manning, Manager
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William L. Doane, Jr., Manager
Nuclear Criticality Safety
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U. S. NUCLEAR REGULATORY COMMISSION
REGION II

Docket No.:	70-1257
License No.:	SNM-1227
Report No.:	70-1257/2016-005
Licensee:	AREVA NP, Inc.
Facility:	Richland Facility
Location:	Richland, Washington 99354
Dates:	October 31, 2016, through November 3, 2016
Inspectors:	T. Vukovinsky, Senior Project Inspector (Paragraph A.1) R. Womack, Project Inspector (Paragraph A.1) G. Goff, Project Inspector (Paragraph A.2) D. Morgan, Project Inspector (Paragraph B.1) D. Anderson, Project Inspector (Paragraph B.2)
Approved by:	E. Michel, Chief Projects Branch 2 Division of Fuel Facility Inspection

Enclosure

EXECUTIVE SUMMARY

AREVA NP, INC. - Richland
NRC Integrated Inspection Report 70-1257/2016-005
October 1 through December 31, 2016

An inspection was conducted by regional inspectors during normal shifts in the performance areas of safety operations and facility support. The inspectors performed a selective examination of licensee activities that were accomplished by direct observation of safety-significant activities and equipment, tours of the facility, interviews and discussions with licensee personnel, and a review of facility documents. No violations of NRC requirements were identified during this inspection.

Safety Operations

- In the area of Operational Safety (Plant Operations), no violations of NRC requirements were identified. (Paragraph A.1)
- In the area of Fire Protection, no violations of NRC requirements were identified. (Paragraph A.2)

Facility Support

- In the area of Maintenance/Surveillance, no violations of NRC requirements were identified. (Paragraph B.1)
- In the area of Emergency Preparedness, no violations of NRC requirements were identified. (Paragraph B.2)

Attachment

Key Points of Contact
List of Items Opened, Closed, and Discussed
Inspection Procedures Used
Documents Reviewed

REPORT DETAILS

Summary of Plant Status

The AREVA-Richland facility converts uranium hexafluoride (UF_6) into uranium dioxide (UO_2) for the fabrication of low-enriched fuel assemblies used in commercial light water reactors. During the inspection period, normal production activities were ongoing.

A. Safety Operations

1. Operational Safety (Inspection Procedure 88020)

a. Inspection Scope and Observations

To verify compliance with License Application section 5.3.4 Nuclear Criticality Safety Analyses (NCSAs), the inspectors reviewed the accident sequences listed in the Nuclear Criticality Safety Analyses (NCSAs) for the following accident sequences: E04-NCSA-080, E04-NCSA-090, and E04-NCSA-130. The inspectors noted that design base assumptions, as detailed in the NCSAs, were accurately reflected in the process areas.

The inspectors interviewed staff and reviewed records associated with the Ammonium Diuranate (ADU) Powder Production and Conversion of UO_2 Pellets to U_3O_8 Powder systems. The following Items Relied On For Safety (IROFS) related to these systems were inspected: 1405, 1410.1, 2203, 2204, 2206, 2207, 2209, 2211, 2225, 3503, 1405, 1410.1, 3808, and 3810. The inspectors verified that the selected IROFS reviewed were being implemented and properly communicated as described in the Integrated Safety Analysis (ISA) Summary. The inspectors confirmed that the IROFS reviewed were present and capable of performing their intended safety function(s).

The inspectors reviewed standard operating procedures (SOPs) and preventative maintenance procedures and records related to the selected systems and identified that the requirements, as identified in the ISA Summary, have been correctly transcribed into written operating procedures. A detailed list of specific procedures reviewed is included in Section 4 of this report. The inspectors noted that the licensee was conducting preventive maintenance and calibrations as required by the ISA Summary for the selected safety controls.

The inspectors interviewed three operators and one technician conducting work activities associated with the selected systems. The inspectors reviewed the postings and operator aids applicable to the tasks being observed and confirmed that these postings and operator aids were current, reflect safety controls, and were followed by the operators. The inspectors reviewed area and work specific training requirements for operators and technicians and verified that active personnel were current on all required training.

The inspectors reviewed operational safety entries in the licensee's corrective action program (CAP) and reportability analyses for the 2015 and 2016 calendar years to verify that deviations from procedures and unforeseen process changes affecting nuclear criticality, chemical, radiological, or fire safety were documented and investigated promptly. Also, the inspectors reviewed records from AREVA U.S. Fuels Business Unit

Horn Rapids Road Fuel Fabrication Facility Configuration Control Assessment Report, June 16-18, 2015 and Quality Assurance Elements Audit, May 17, 2016, to confirm that the licensee was conducting routine self-assessments in the area of operational safety.

b. Conclusion

No violations of NRC requirements were identified.

2. Fire Protection (Annual) (IP 88055)

a. Inspection Scope and Observations

To assess that the material condition of fire protection equipment, systems, and features were in accordance with Chapter 7 of the license application and drawings/diagrams, the inspectors walked down plant areas containing safety controls and IROFS. The areas inspected were: Dry Conversion Facility (DCF), UO_2 Building, Blended Low Enriched Uranium (BLEU) area, the ceramics area, the fuel bundling and assembly area, Specialty Fuels (SF) building, Warehouses 2 and 7, and outdoor areas.

The inspectors observed flammable materials storage to verify proper storage in marked cabinets, as specified in approved procedures. Inspectors conducted walk downs and noted that housekeeping and the control of combustible materials were consistent with approved procedures. Through interviews with supervisors and reviews of hot work documentation, the inspectors noted that the hot work program (cutting, grinding, welding, etc.) was being implemented in accordance with approved procedures.

The inspectors reviewed preventive maintenance and functional test records and noted that fire detection and suppression equipment was being properly tested to perform the intended safety function. Inspectors subsequently performed walk downs and noted that the fire protection equipment was maintained in a state of readiness. The inspectors reviewed maintenance records in order to determine that fire dampers, doors, and penetration seals were being maintained in a condition that would ensure availability and reliability to perform the intended safety function. Also during the walk downs, the inspectors noted that fire hoses and portable extinguishers were provided at their designated locations, in adequate condition, and access was unobstructed.

The inspectors reviewed the licensee's CAP since the last fire protection inspection in order to verify that the licensee was identifying safety controls or IROFS fire protection operability problems and entering them into their corrective action program. Inspectors also evaluated the corrective actions associated with fire protection to determine that both in-progress and completed corrective actions were being tracked or completed in accordance with procedures.

b. Conclusion

No violations of NRC requirements were identified.

B. Facility Support

1. Maintenance and Surveillance of Safety Controls (Inspection Procedure 88025)

a. Inspection Scope and Observations

The inspectors evaluated elements (maintenance implementation, surveillance and calibration, audits, training, and maintenance problem identification and resolution) of the licensee's maintenance and surveillance program to verify compliance with section 11.2 of the license application. The inspectors focused on the ADU Powder Production and Conversion of UO_2 Pellets to Triuranium Octoxide (U_3O_8) Powder systems. The inspectors performed walk-downs and observed selected IROFS and safety controls.

The inspectors interviewed the maintenance manager, supervisors, engineers, and technicians; attended plan-of-the-day meetings; performed document reviews; and observed maintenance and surveillance field activities to verify that IROFS and other safety controls were maintained available and reliable to perform their safety function when needed.

The inspectors evaluated the licensee's work control program to verify that the program had provisions to ensure pre-job planning and preparation of work orders to support maintenance and surveillance activities were conducted in accordance with licensee procedures and requirements. The inspectors reviewed preventive maintenance and instrument repetitive maintenance, as part of surveillance work packages, and work orders for accuracy and to ensure that test packages challenged and verified operability of IROFS and safety controls.

The inspectors observed maintenance work activities on select systems and processes and determined that work activities were conducted in accordance with licensee requirements and approved procedures. Appropriate corrective actions were taken when a safety control was determined to be failed or degraded. The inspectors observed post-maintenance testing and calibrations to verify adequate performance prior to restoring equipment to operational status, as specified by the licensee requirements. Completed work orders were reviewed prior to returning equipment to service.

The inspectors observed calibration of radiation detectors. The inspectors verified that calibrations were conducted in accordance with the licensee's procedures and required frequency.

The inspectors evaluated the licensee's maintenance program audit. Specifically, the inspectors reviewed the written plan for the audit, the depth of review, and corrective actions taken as a result of deficiencies identified. The inspectors verified that the maintenance program audit was in compliance with license requirements regarding audit content and required frequency.

The inspectors reviewed training records for select maintenance technicians. Specifically, the inspectors reviewed training requirements for discipline, annual, general, and on-the-job training. All training records reviewed were completed by the licensee's required completion date.

The inspectors also reviewed a sample of corrective action reports. Specifically, the inspectors assessed the reports for appropriateness, timeliness, and tracking. The inspectors verified that the licensee's problem identification and resolution program identified performance issues relating to the maintenance and surveillance of IROFS and safety controls. The identified issues were entered into the CAP and the assigned corrective actions were taken.

b. Conclusion

No violations of NRC requirements were identified.

2. Emergency Preparedness (Inspection Procedure 88050)

a. Inspection Scope and Observations

The inspectors interviewed staff, reviewed records, and determined that any changes made to the Emergency Plan or within the facility had been properly coordinated within the emergency preparedness program to verify compliance with Chapter 8 of the license application. The inspectors reviewed procedures with significant revisions since the last emergency preparedness inspection and determined that the changes were in compliance with the Emergency Plan. The inspectors discussed and reviewed the licensee emergency call list and verified that the list was current.

To verify training requirements and personnel qualifications were in compliance with the Emergency Plan, the inspectors reviewed Plant Emergency Response Management Team and Plant Emergency Response Team training records (see section 4 of the Attachment) and interviewed licensee staff regarding emergency preparedness training in the past year. The inspectors verified that the licensee provided training for their personnel and tested emergency equipment as per the Emergency Plan. The inspectors verified that the licensee provided training for hypothetical emergency situations which were effective and consistent with the frequency and performance objectives required in the Emergency Plan. The inspectors attended a first-aid training session for selected members of the Plant Emergency Response Team and to verify that the training was in compliance with the training requirements.

The inspectors reviewed the written agreements with the off-site agencies and verified that the organizations, required by the Emergency Plan, had up-to-date mutual aid agreements, and a Memorandum of Understanding. The inspectors interviewed representatives of the Richland Police Department and Benton County Emergency Services and determined that each maintained an adequate understanding of the written agreements. The inspectors interviewed off-site personnel and reviewed records and verified that the licensee invited the off-site agencies for training as required by the Emergency Plan and determined that the training given was in accordance with the license application. The inspectors reviewed records and verified that the licensee performed communication checks with the off-site organizations as required by the Emergency Plan.

The inspectors observed the storage of the emergency equipment repositories at the Emergency Operations Center (EOC), the Dry Conversion Facility, the Specialty Fuel Building, the Engineering Laboratory Operations Building, and the Central Emergency Equipment Shed, and verified that the inventory levels were maintained as required by

the Emergency Plan. The inspectors performed a check of selective items of emergency response equipment and verified functionality. The inspectors also verified that the required maintenance and testing of the emergency response equipment were conducted at the required frequency. The inspectors toured the on-site EOC and the Alternate EOC at Energy Northwest and verified that the areas were readily accessible and maintained the appropriate amount of communication equipment. The inspectors reviewed the accountability procedure and verified that accountability meeting points were accessible.

The inspectors reviewed independent audits of the emergency program and verified that any problems or deficiencies were corrected. The inspectors reviewed the self-assessments generated since the last inspection and verified that the licensee utilized their tracking system to adequately track and resolve self-assessment findings.

b. Conclusion

No violations of NRC requirements were identified.

C. Exit Meeting

The inspection scope and results were presented to members of the licensee's staff at various meetings throughout the inspection period and were summarized on November 3, 2016, to R. Land and staff. No dissenting comments were received from the licensee. Proprietary information was discussed but not included in the report.

SUPPLEMENTAL INFORMATION

1. KEY POINTS OF CONTACT

Name	Title
W. Backus	Training Specialist
D. Davis	Emergency Manager, Benton County Emergency Services
J. Deist	Emergency Preparedness
W. Doan	Nuclear Criticality Safety Manager
D. Harris	Principal Mechanical Engineer
J. Henn	Maintenance Supervisor
J. Kreitzburg	Criticality Safety Engineer
R. Land	Site Manager
P. Lee	Preventative Maintenance Administrator
C. Manning	Licensing and Compliance Manager
S. Nunez	Emergency Preparedness/Security
K. O'Brien	Fire Systems Inspector (contractor)
G. Purser	Instruments Technician
T. Tate	Environmental, Health, Safety and Licensing, Manager
J. Taylor	Captain, Richland Police Department
J. Veysey	Manager of Plant Engineering, Technical Support & Maintenance
S. Wright	Safety Manager

Other licensee employees contacted included operators, technicians, production staff, and office personnel.

2. LIST OF ITEMS OPENED, CLOSED, AND DISCUSSED

None

3. INSPECTION PROCEDURES USED

88020	Operational Safety
88025	Maintenance and Surveillance of Safety Controls
88050	Emergency Preparedness
88055	Fire Protection (Annual)

4. DOCUMENTS REVIEWED

Records:

Audits: Fire Hazards Management (external, triennial audit), dated august 31, 2016
Richland Fire Department (Fire Marshal Inspections), dated March 22, 2016 and September 21, 2016

C090I001, Foxboro Model E12D1 D/P Transmitter, Version (Ver.) 1
C090I002, Edgetech Hygrometer Model Com.Air, Ver. 2
C090I003, Omega Thermocouples Model NB1-CAIN-140-20, Ver. 3
C090I004, Acromag Model 655T-0600, T/C Transmitter, Ver. 2
C090I007, Acromag Model 655T-0600, T/C Transmitter, Ver. 2
C090I008, Acromag Model 655T-0600, T/C Transmitter, Ver. 2

C090I009, Edgetech Hygrometer Model Com.Air, Ver. 2
C090I010, GSE Model #660 w/ Rice Lake Platform Model 2.5x2.5 HP-1K, Ver. 6
C090I011, GSE Model #660 w/ GSE Model 4440, Ver. 2
C090P001, ADU UO_2 Powder Production Interlocks, Revision (Rev.) 15
C090P002, Valve Diverter Calciner UF6 L2 Cal Drop, Rev. 7
C090P005, Calciner Line 2 12MO MW, Rev. 11
C090P019, Calciner Line 2 5YR MW, Rev. 5
C090P021, Calciner Line 2 Lubrication 1MO MW, Rev. 3
C100P001, Rev. 29, Overflow/Vents 12MO PF
C130P001, Rev. 3, U_3O_8 Line 1 & Line 2
C130P002, Rev. 5, Pellet Oxidizer Burnback System 3 MO EL
IRM Out-of-Tolerance Web Cap From, FRM-30325E, Ver. 2.1
Maintenance Order 11334726
PMs: CG06P001, CG06P002, CG06P003, CG06P004, CG06P005, CG06P006, CG06P007, CG06P008, CG06P009, CG06P010, CG06P014, CG06P016, CG06P018, CG06P019
PM, C810I001-0001, Ver. 2
SOP-40020, In-Plant Air Sampling
SOP-40239, U_3O_8 Oxidation Ovens
SOP-40240, Sweco Operations
SOP-40274, ADU Conversion Line 2 Process Start Up
SOP-40276, ADU Conversion Line 2 Calciner Operation
SOP-40486, Richland Operations General Rules

<u>Procedures</u>:
E08-01-1, Emergency Plan, Ver. 11
E08-03-2.1, Protective Action Decisions, Ver. 3.4
E08-03-3.1, Plant Emergency Director, Ver. 7
E08-03-3.2, Security Liaison, Ver. 7
E08-03-3.4, Accountability Liaison, Ver. 8
E08-03-3.9, Public Information Liaison, Ver. 6
E08-03-3.14, Corporate CAT Liaison, Ver. 1
E08-03-4.2, Incident Notification Worksheet – Alert and HazMat Level 2, Ver. 13
E08-03-4.3, Incident Notification Worksheet – Site Area Emergency and HazMat Level 2, Ver. 15
E08-03-7.2, Assistant Public Information Officer, Ver. 5
E08-03-8.6, Admittance of Essential Personnel through Roadblocks, Ver. 9
E08-03-8.5, Emergency Equipment Lists, Ver. 8
E08-03-8.11, Response to Offsite Transportation Event, Ver. 1
E08-03-8.12, Relocating the Emergency Operations Center, Ver. 1
E08-04-2.2, Kadlec Regional Medical Center, Ver. 5
E08-04-2.7, Richland Police Department, Ver. 5
E08-04-2.8, Benton County Emergency Services, Ver. 5
E08-04-2.10, Energy Northwest, Ver. 5
E08-04-2.11, Franklin County Emergency Management, Ver. 5
E08-04-2.12, Richland Fire Department, Ver. 3
E08-04-3.1, Perma-Fix Northwest Richland, Incorporated, Ver. 3
E04-NCSS-G06, Fire Prevention and Firefighting, Ver. 25.0, dated April 25, 2016
E10-08-011, Management Measures, SNM-1227 – Chapter 11
E12-03-064, Annual Maintenance Audit, Ver. 2

MCP-30031, Flammable and Combustible Liquids/ Solids Storage & Handling, Ver. 1.0, dated March 29, 2016
MCP-30039, Hot Work Procedure, Ver. 9.0, dated April 22, 2016
MCP-30040, Fire Protection Program, Ver. 8.1, dated June 9, 2015
SOP-40857, Maintenance Hot Work Permit Procedure, Ver. 9.0,
SOP-40486, Richland Operations General Rules, Ver. 34,
SOP-40789, Work Order Instructions, Ver. 15
SOP-40791, Maintenance Work Permit and Pre-Job Briefing, Ver. 12
SOP-40839, Instrumentation Repetitive Maintenance (IRM), Ver. 12
SOP-41044, Designated Hot Work Area Requirements Procedure, Ver. 2.0,

Condition Reports Written as a Result of the Inspection:
None

Condition Reports Reviewed:
2015-6520, Internal Audit 15:54
2015-9434, NRC Observations, dated May 31, 2015
2016-1378, Evaluation of Reportability for NCS Infraction 16-003
2016-1521, Evaluation of Reportability for NCS Infraction 16-004
2016-3242, Evaluation of Reportability for NCS Infraction 16-008
2016-4113, Evaluation of Reportability for NCS Infraction 16-011
2016-4144, Evaluation of Reportability for NCS Infraction 16-012
2016-4760, TITLE NOT SPECIFIED
2016-4861, Evaluation of Reportability for NCS Infraction 16-018
2016-5600, Evaluation of Reportability for NCS Infraction 16-024
2016-5858 – Small Fire in MURS
2016-5911 – H_2 Detector in UO_2 Room 100 caused Fire Alarm Activation
2016-6028, Evaluation of Reportability for NCS Infraction 16-030
2016-7156 – Fire Alarm in Laundry Facility
2016-7388, FA Component Nonconformance, dated October 31, 2016
Apparent Cause Analysis, CR# 2015-9866, dated December 28, 2015, Rev.0
Apparent Cause Analysis, CR# 2016-5858, dated October 20, 2016, Rev. 0

Other Documents:
Annual EP Orientation for Offsite Agencies and Nearby Neighbors, December 15-16, 2015
Chapter 7 of the License Application (Fire Safety)
E04-NCSA-080, Uranium Recovery, Ver. 18
E04-NCSA-090, UO_2 Powder Production, Ver. 15
E04-NCSA-130, Conversion of UO_2 Pellets to U_3O_8 Powder, Ver. 11
Fire Hazards Analyses for: DCF, SF Building, UO2 Building, and Warehouses 2 and 7
HRR-EP-100002, 2015 PERMT Training, Plant Emergency Director (PED) Refresher Training
HRR-EP-100006, 2015 PERMT Training, Security Liaison and Traffic Control Monitor Refresher Training
HRR-EP-100026, 2015 HRR EP Refresher Training, Accountability and Staging Area Personnel
HRR-EP-100028, 2015 PERMT Training, EOC Public Information Team Refresher Training
HRR-EP-200001, 2016 PERT Training, Basic 1st Aid
HRR-EP-200002, 2016 PERT Training, HAZMAT Spill Response and Decontamination

HRR-EP-200003, 2016 PERT Training, CHEM RAD Field Teams
HRR-EP-200005, 2016 PERT Training, Hands-On Fire Extinguisher Training
HRR-EP-200006, 2016 PERT Training, SCBA Training
HRR-EP-200007, 2016 PERT Training, Advanced 1st Aid
Internal Audit Report, Audit No.: 16:91, Independent Audit of EP Program dated October 31, 2016
IR ARV SQE IG 16-034, Revision R 0, Emergency Preparedness Assessment May 9-12, 2016, dated June 28, 2016
Letter dated July 15, 2016, Critiques Lessons Learned Summary for AREVA Richland Facility Emergency Table Top Exercise Conducted on April 27, 2016
Letter to Preferred Freezer Services, AREVA Inc. Annual Emergency Preparedness Orientation for Offsite Agencies and Nearby Neighbors, dated December 4, 2015
Pre Fire Plans for DCF, SF Building, UO2 Building, and Warehouses 2 and 7
Work Orders: 13275276, 13281694, 13284068, 13293589, 13300526, 13303083 13309145, 13305941, 13308708, 13290416, 13306278, 13297125, 13999978