



January 19, 2018  
18-004

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 December 21, 2017, NRC (Lesser), to BWXT (Burch), BWXT Nuclear Operations Group - Nuclear Regulatory Commission - Inspection Report 70-27/2017-008  
(3) Letter dated August 9, 2017, BWXT (Burch), to Director, NMSS (NRC), 60-Day Written Report for EN 52840  
(4) Letter dated September 7, 2017, NRC (Lesser) to BWXT (Burch), BWXT Nuclear Operations Group - Nuclear Regulatory Commission Special Inspection Report 70-27/2017-007  
(5) Letter dated October 16, 2017, BWXT (Burch) to NRC (Lesser), 60-Day Report Additional Information

Subject: Response to Apparent Violations in Inspection Report 70-27/2017-008

Dear Sir or Madam:

BWXT Nuclear Operations Group-Lynchburg (NOG-L) is providing written response to the Apparent Violations (AV) in Inspection Report No. 70-27/2017-008 (Reference 2). The response to the AVs is provided in the four attached Enclosures.

BWXT NOG-L acknowledges that the violations existed as stated in the NRC in Reference 2.

- Enclosure 1 provides an explanation and a status of planned and completed corrective actions for Apparent Violations AV 70-27/2017-008-001, AV 70-27/2017-008-002 and AV 70-27/2017-008-003.
- Enclosure 2 provides additional information on BWXT NOG-L's risk assessment of the AVs and our position that we still consider a criticality highly unlikely.
- Enclosure 3 provides additional information documenting our position that a critical mass was not present in the desiccant filters at the time of discovery.

Document transmitted contains  
OUO information

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- Enclosure 4 includes a Request for Enforcement Consideration in which BWXT NOG-L requests that the NRC consider credit for Licensee Identification and for an Immediate, Effective and Comprehensive Investigation and Corrective Actions in your evaluation of the appropriate enforcement. Enclosure 4 also requests that the NRC consider consolidating the AVs as they are directly related to the same issue as described in the NRC Enforcement Manual.

If you have questions or require additional information, please contact Chris Terry, Manager of Licensing and Safety Analysis, at [cterry@bwxt.com](mailto:cterry@bwxt.com) or 434-522-5202.

Sincerely,

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

Enclosures

cc: NRC, M. Lesser, Region II  
NRC, Resident Inspector  
NRC, M. Baker  
President & COO BWXT NOG, JG Henry