

From: Rivera Ortiz, Joel
Sent: Friday, January 17, 2020 10:52 AM
To: Bixenman, Andrew B.
Cc: Padgett, Wyatt; Sippel, Timothy; Edwards, Denise; Cooke, Lindsey; Adkins, Brannen (Brannen.Adkins@nrc.gov)
Subject: Document Request - NRC Inspection on Feb 24th
Attachments: Document Request LES-OPS-MS-NCS-IR 2020-001.pdf

Dear Mr. Bixenman,

The NRC will conduct a routine inspection at the Urenco USA facility the week of February 24, 2020. The inspection will implement the following NRC inspection procedures (IPs):

IP 88015 – Nuclear Criticality Safety (Inspector: Denise Edwards)
IP 88020 – Operational Safety (Inspector: Joel Rivera)
IP 88025 – Maintenance and Surveillance of Safety Controls (Inspector: Timothy Sippel)

This email requests a number of documents that we would like to obtain for our preparation activities (see attachment). If practical, we would like to have the documents at least a week prior to the inspection to facilitate our preparation and be able to conduct a productive inspection. You can provide the documents in hard copy or electronic format. In the attachment, we also specified some items that we will need during the on-site inspection week.

If you have any questions or concerns regarding this request, please contact me to discuss.

Best Regards,

Joel Rivera-Ortiz

Sr. Fuel Facility Inspector
U.S. Nuclear Regulatory Commission/Region-II
Division of Fuel Facility Inspection
Projects Branch 1

404-997-4825

Joel.Rivera-Ortiz@nrc.gov

This letter contains mandatory information collections that are subject to the Paperwork Reduction Act of 1995 (44 U.S.C. 3501 et seq.). The Office of Management and Budget (OMB) approved these information collections (approval number 3150-0009). Send comments regarding this information collection to the Information Services Branch, Office of the Chief Information Officer, Mail Stop: O-1F13, U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by e-mail to Infocollects.Resource@nrc.gov, and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202, (3150-0009) Office of Management and Budget, Washington, DC 20503.



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**
REGION II
245 PEACHTREE CENTER AVENUE N.E., SUITE 1200
ATLANTA, GEORGIA 30303-1200

January 17, 2020

INSPECTION DOCUMENT REQUEST

Licensee: Louisiana Energy Services

Facility: URENCO USA

Docket Number: 07003103

License Number: SNM-2010

**Inspection Report
Number:** 2020-001

Enterprise Number: EPID: I-2020-001-0078

Inspection Dates: February 24 – 28, 2020

**Inspection Procedures &
Lead Inspectors:** IP 88020 – Operational Safety (Joel Rivera)
IP 88025 – Maintenance & Surveillance of Safety Controls (Timothy Sippel)
IP 88015 – Nuclear Criticality Safety (Denise Edwards)

NRC Team Lead: Joel Rivera
Sr. Fuel Facility Inspector
U.S. NRC/Region-II
P: 404-997-4825
E: Joel.Rivera-Ortiz@nrc.gov

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IP 88020 – OPERATIONAL SAFETY

Documents Requested for In-Office Preparation

- 1) Latest version of the ISA Summary
- 2) Latest version of the License Application and Safety Analysis Report
- 3) Copy of the governing procedure for the management of Items Relied on for Safety (IROFS)
- 4) Copy of the governing procedures for the implementation of the following management measures, as applicable to IROFS:
 - Configuration Management
 - Maintenance
 - Training and Qualifications
 - Procedures
 - Audits and Assessments
 - Incident Investigations
 - Records Management
 - Other Quality Assurance (QA) Elements
- 5) List of corrective action program documents generated in the last 12 months related to problems with IROFS. Please include a brief description of the problem, if practical.
- 6) List of changes implemented in the last 12 months that affected IROFS; including modifications of existing controls, elimination of previous controls, and addition of new controls
- 7) List of changes in the Operations Safety organization in the last 12 months that were subject to the position-specific requirements of the license
- 8) List of temporary compensatory measures put in place in the last 12 months to support deficiencies in IROFS. Please include a brief description of the compensatory measure, if practical.
- 9) Copy of the most recent self-assessment and/or audits report in the area of Operational Safety

Documents/Support Requested for On-site Inspection

- 1) The inspectors will select a sample of safety controls for review based on the information provided for items 1 through 9 above. For the selected safety controls (IROFS), please provide:
 - a. Plant procedures showing the specific implementation of the IROFS

- b. Procedures and records of recent activities performed to demonstrate functionality of the IROFS (e.g. testing, inspection, calibration, preventive maintenance, etc.)
 - c. Examples of training procedures and records showing that training requirements for the selected IROFS have been maintained
 - d. Complete configuration management package for recent changes affecting the selected IROFS
- 2) Site support to conduct plant tours and observe ongoing operations in the control room and other production areas
 - 3) Site support to coordinate interviews with plant operators
 - 4) Site support to attend the “plan of the day” meetings
 - 5) Keep inspectors informed of plant operations on a daily basis
 - 6) Inform the inspectors of any updates to the Operational Safety program that have occurred since this document request was issued.

IP 88025 – MAINTENANCE & SURVEILLANCE OF SAFETY CONTROLS

Documents Requested for In-Office Preparation

- 1) List of corrective action program entries for the last 12 months pertaining to maintenance and surveillance of IROFS
- 2) List of maintenance activities performed on safety controls (IROFS) in the last 12 months
- 3) Copy of the most recent independent audits, self-assessments, and QA surveillances, as applicable, pertaining to maintenance and surveillance of safety controls. Please include the procedure governing audits and assessments, and the qualifications of the auditor(s).
- 4) List of maintenance and surveillance activities scheduled for the week of NRC's on-site inspection.
- 5) Maintenance and Surveillance Organizational Chart and list of changes in the organization that are applicable to the position-specific requirements of the license. Please include a brief description of the changes.
- 6) Procedure(s) governing maintenance activities and the overall maintenance program/work control, including post maintenance testing, functional testing and surveillance activities.
- 7) Procedure(s) governing the control and use of measurement & testing equipment (M&TE) for equipment used to perform calibrations including calibration of safety related equipment
- 8) Procedure(s) governing pre-job planning/pre-job briefs
- 9) Procedure(s) governing work packages (i.e. documentation of activities planned, executed, and completed)
- 10) List of any maintenance staff qualified in the last 12 months. Please include their qualification date and the associated procedure(s) that govern training for the maintenance organization.
- 11) Schedule for routine meetings conducted by the maintenance organization (i.e. maintenance plan of the day, turnover meetings, planning/work control meetings, etc.)

Documents/Support Requested for On-site Inspection

- 1) The inspectors will select a sample of maintenance activities completed since the last NRC inspection, with emphasis on risk-significant safety controls. Please provide work completion records of those activities (e.g. final work order packages)
- 2) The inspectors will directly observe a sample of maintenance activities scheduled for the week of the on-site inspection. Please provide updated copies of the daily/week's maintenance and surveillance schedule; keep the inspectors informed of maintenance activities, including emergent, safety significant work; and provide site support to observe selected activities.

- 3) The inspectors will interview staff who are responsible for and aid in implementing the maintenance and surveillance program. Please provide contact information for staff in the organization.
- 4) Inform the inspectors of any updates to the maintenance and surveillance program that have occurred since this document request was issued.

IP 88015 – Nuclear Criticality Safety (NCS)

Documents Requested for In-Office Preparation

- 1) Any new and revised NCS program procedures in the last 12 months (if none, please indicate)
- 2) List of Corrective Action Program entries in the last 12 months related to NCS issues, including the criticality accident alarm system (CAAS)
- 3) Copy of the following NCS-related analyses:
 - Criticality safety evaluations/analyses (CSEs/CSAs) covering the Liquid Effluent Collection and Transfer System
 - CSE/CSA(s) covering the Contingency Dump System
 - Any new or revised CSEs & CSAs since the last inspection
- 4) NCS weekly and internal audit procedures
- 5) NCS engineer qualification procedure
- 6) NCS procedure covering CSE/CSA development
- 7) List of any new qualifying/qualified NCS staff since the last NRC inspection in this area
- 8) Audit(s) and self-assessment(s) of the NCS program since the last NRC inspection in this area
- 9) NCS training materials/exam for personnel who handle special nuclear material (SNM)
- 10) Emergency response procedure and training material for criticality accident scenarios
- 11) Validation report for NCS computer codes (if revised since the last inspection)

Documents/Support Requested for On-site Inspection

- 1) Results of NCS inspections (a.k.a. weekly assessments/walkdowns) since the last NRC inspection in this area
- 2) Qualification and training records for any newly qualified/qualifying NCS engineers (if applicable)
- 3) CAAS maintenance (work orders)/testing/calibration records for the last 12 months
- 4) Logistic support to accompany an NCS engineer in a weekly walk-down
- 5) Coordinate an interview with the NCS manager