



UNITED STATES  
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

January 22, 1997

B&W Fuel Company  
Commercial Nuclear Fuel Plant  
ATTN: Mr. Charles W. Carr, Vice President  
Manufacturing and Field Services  
P.O. Box 11646  
Lynchburg, VA 24506-1646

SUBJECT: REPLY TO ADDENDUM OF CONFIRMATORY ACTION LETTER No. H-96-001

Dear Mr. Carr:

This refers to your letter of December 20, 1996, responding to our Confirmatory Action Letter (CAL) No. H-96-001 and its addendum of December 3, 1996.

Based on our review of the information presented in your reply, we have determined that your root cause analysis and your corrective action plan are appropriate for contributing causes, but we are uncertain that the root causes have been identified and assessed with comporting corrective actions. Following are examples of our evaluation:

1. In the area of management oversight, you identified the management system, Quality Assurance (QA) program, worksite supervision, and procedure adherence as the causes. We believe these factors are contributing causes to your performance, whereas you did not identify the root causes. For example:
  - What caused and why did your management system not assure an implemented QA program? What elements of your management system failed and why did they fail (i.e., management control, responsibility, culture, internal audits, conduct of operations, inspection procedures, etc...)?
  - What caused and why was your QA program not appropriately applied? What elements of this program failed to identify the need to apply QA (i.e., overcheck program, design and conduct of item monitoring system, revised procedures to reflect operation/system changes, etc...)?
  - What caused your worksite supervision to be less than sufficient (i.e., number of supervisors, ability of staff, management understanding of operation and cognizance, procedure inadequacy, etc...)?

Therefore, comporting corrective actions (i.e., management performance criteria, administrative procedures, supervision training,) remain uncertain in remedying the root causes which were not fully identified and assessed in your analysis.

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2. In the area of operating procedures, you used a similar approach to derive six contributing causes, but you did not identify what factors caused your performance and why. Consequently, your correction action plan does not address the root causes yet to be identified.

The violations identified in our Inspection Report No. 70-1201/96-202, your root cause analysis, and your corrective actions will be discussed in a predecisional enforcement conference which has been scheduled for January 27, 1997. At this meeting, you are invited to present additional information for NRC consideration relative to determining an appropriate enforcement action.

Further, we will examine and evaluate the implementation of your corrective actions during future reviews and inspections including the programmatic elements of your improvement program to strengthen the facility operations and to avoid recurring and similar non-compliance. Following our final evaluation of your corrective actions, we will contact you regarding the resumption of the VVER fuel assembly downloading operation.

Questions concerning this matter should be referred to Tom Pham on (301) 415-8154 or D. L. Whaley on (301) 415-8108.

Sincerely,

(Original signed by)

Elizabeth Q. Ten Eyck, Director  
Division of Fuel Cycle Safety  
and Safeguards, NMSS

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