



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
101 MARIETTA STREET, N.W.
ATLANTA, GEORGIA 30323

AUG 01 1985

Report No.: 70-1201/85-06

Licensee: Babcock and Wilcox Company
Commercial Nuclear Fuel Plant
Lynchburg, VA 24505

Docket No.: 70-1201 (CNFP)

License No.: SNM-1168

Facility Name: Commercial Nuclear Fuel Plant

Inspection Conducted: July 17-19, 1985

Inspector:

G. L. Troup

7/31/85
Date Signed

Approved by:

E. J. McAlpine, Chief, Material Control
and Accountability Section
Nuclear Materials Safety and Safeguards Branch
Division of Radiation Safety and Safeguards

7/31/85
Date Signed

SUMMARY

Scope: This routine, unannounced inspection involved 19 inspector-hours on site in the areas of Management Organization and Controls, Nuclear Criticality Safety, Procedures, Operations Review and Audits.

Results: No violations or deviations were identified.

REPORT DETAILS

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1. Key Persons Contacted

- *R. A. Alto, Plant Manager
- *C. W. Speight, Manager, Facilities and Services
- *W. T. Engelke, Manager, Quality Control
- J. T. Ford, Manager, Fuel Manufacturing
- *J. P. Watters, License and Control Administrator
- *K. E. Shy, Health Physicist
- F. M. Alcorn, Supervisor, Nuclear Criticality Safety (LRC)

The inspector also interviewed several other licensee employees.

*Denotes those present at the exit interview.

2. Exit Interview

The inspection scope and findings were summarized on July 1, 1985, with those persons indicated in paragraph 1 above. The inspector described the areas inspected and discussed in detail the inspection findings. No dissenting comments were received from the licensee. The licensee did not identify as proprietary any of the materials provided to or reviewed by the inspector during this inspection.

3. Licensee Action on Previous Enforcement Matters

This subject was not addressed in the inspection.

4. Management Organization and Controls (88005)

- a. A change to the facility organization was implemented on May 1, 1985. The Plant Manager is functioning in the position of Manager, Safety and Licensing, as reported to the NRC on April 1, 1985, until the position is permanently filled. By memorandum dated April 30, 1985, the Safety Review Committee was reappointed and assignments were made to the various positions consistent with Section 5.1 of the license application. Management representatives stated that once the position of Manager, Safety and Licensing is staffed, a license amendment will be submitted to revise Section 5.1 of the license application, and procedure RC-1805, CNFP Safety Review Board, will be revised accordingly.
- b. The inspector reviewed minutes of the Safety Review Board meeting of June 28, 1985, and verified the attendees were as required by Procedure RC-1805, and the topics discussed were in accordance with the license requirements. No violations or deviations were identified.

5. Internal Review and Audits (88005 and 88015)

An examination of the records showed that inplant health-safety audits had been performed on a weekly basis and that independent nuclear criticality safety and health physics audits had been performed quarterly by B&W-LRC and B&W-NNFD. The audit results showed the audit program was comprehensive in scope and that the licensee had been performing operations involving licensed material in accordance with the regulatory, license conditions and procedural requirements. Verification was made that audit reports were provided to the Plant Manager. No violations or deviations were identified.

6. Procedures (88005 and 88015)

- a. Licensee administrative procedures (PC-1300, Rev. 6, May 11, 1983, CNFP Procedures Numbering System, PC-1302, Rev. 1, March 30, 1981, Distribution and Control of CNFP Production Planning and Control Procedures, and PC-1330, Rev. 3, May 27, 1983, Preparation and Approval of CNFP Administrative and Operative Procedures) provide the guidance and establish the controls for initiating, preparing, reviewing, approving, issuing, and revising licensee procedures. Each functional component within the licensee's organization is responsible for their operating procedures conforming to the above procedures. The inspector verified that the manufacturing and the health safety procedures met the administrative and operative format and content requirements.
- b. During tours of plant areas, the inspector observed that operating and health safety procedures were available to workers. The inspector verified by spot-checking procedures in the work areas against the master list that current revisions are in use. No violations were identified.
- c. The inspector reviewed selected manufacturing procedures and verified that they contain nuclear safety and health safety requirements or refer to requirements posted in the operating area. During tours of the plant, the inspector observed that nuclear safety limits were posted.
- d. In reviewing several manufacturing procedures, the inspector noted that several contained the statement "Deviation from posted limits must not be undertaken without prior Health Safety approval." The inspector discussed this with licensee management representatives as to on what basis would Health Safety approve deviations from posted Nuclear Safety requirements. Licensee representatives stated that deviations or changes would be approved only after a nuclear safety analysis was performed and approved by the Safety Review Committee. However, they stated that the statement in the procedure served two purposes: (1) emphasize to the workers the need to comply with the posted requirements; and (2) provide a means for bringing potential problems to the safety function and management's attention. The inspector acknowledged this and had no further questions.

7. Nuclear Criticality Safety (88015)

- a. Section V, Paragraph 5.5 of the license application requires that nuclear criticality safety analyses capability shall be available for consultation and assistance, and shall be organizationally independent of the CNFP. This function is performed by the Nuclear Criticality Safety Group at the Lynchburg Research Center. Section V, Paragraph 7.1.5 of the license application requires that a library of computer codes be maintained and utilized in conducting nuclear safety evaluations. The inspector discussed the CNFP nuclear safety evaluations with the cognizant supervisor and determined that a library of codes is maintained and utilized in performing the analyses.
- b. The inspector reviewed the nuclear safety analyses performed for one plant modification which involved SNM. The analysis was performed by qualified individuals and was submitted to the Safety Review Board prior to being implemented. The inspector also reviewed the nuclear safety, health physics, and industrial safety audits which were performed after the modification was made, and the written release for operation. No violations were identified.
- c. The inspector reviewed the records for the monthly emergency evacuation system tests for the period April-June 1985 and the annual calibration of the plant criticality alarm system performed on May 28, 1985. No violations were identified. During the annual calibration of the system, an alarm was received which resulted in plant evacuation. The inspector reviewed the cause of this alarm (which requires two independent alarm signals) with the cognizant supervisor. The cause was identified as a two units being in an alarm condition from the calibration when they were returned to service. A change to the procedure is being made to preclude such a situation in future calibrations.

8. Operations Review (88015 and 88020)

- a. The inspector observed the operations for disassembling fuel bundles and removing the fuel pellets from the rods for a group of previously fabricated fuel bundles were being accomplished in accordance with the nuclear safety and health physics requirements established for the work. The inspector discussed the operation with licensee representatives and observed the operations. No violations were identified.
- b. The inspector observed that pellet containers were stored in accordance with nuclear safety requirements (safe slab geometry). Completed fuel bundles were stored in permanent fixtures to maintain separation. Protective coverings for fuel bundles were provided with drain ports to preclude the accumulation of water in the bundles.
- c. No apparent fire or industrial safety hazards were observed. General housekeeping conditions were satisfactory.