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FRAMATOME COGEMA FUELS

January 27, 1997

Ms. Elizabeth Q. Ten Eyck, Director
Division of Fuel Cycle Safety & Safeguards, NMSS
United States Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Subject: Framatome Cogema Fuels Response to CAL No. H-96-001; Docket No. 70-1201; License No. SNM-1168

- References:
1. Confirmatory Action Letter No. H-96-001; from Dr. Carl J. Paperiello, USNRC to Mr. Charles W. Carr, FCF; Dated November 20, 1996
 2. Framatome Cogema Fuels' Response to Confirmatory Action Letter No. H-96-001; from Ms. G. F. Elliott, FCF to Mr. Philip Ting, USNRC; Dated November 27, 1996
 3. Addendum to Confirmatory Action Letter No. H-96-001 from Ms. Elizabeth Q. Ten Eyck, USNRC to Mr. Charles W. Carr, FCF; Dated December 3, 1996
 4. U.S. Nuclear Regulatory Commission's Reply to Addendum of Confirmatory Action Letter No. H-96-001; from Ms. Elizabeth Q. Ten Eyck, USNRC to Mr. Charles W. Carr, FCF; Dated January 22, 1997

Dear Ms. Ten Eyck:

Thank you for your letter dated January 22, 1997. The overarching root cause and the associated corrective actions has not been discussed as a singular subject in any of the correspondence referenced. The corrective actions in our December 20, 1996 letter which deal with changes in management practices and the addition of administrative procedures are intended to correct what we feel is the broader root cause of inadequate management oversight.

Until the event investigation, FCF senior management missed the key issue which caused the event. The organization, for reasons still unclear but probably related to controlling the cost of the work, believed that this work could be completed outside the normal procedures and guidelines up to the point where the SNM was removed from the cladding. The contract work authorization stated that the work was safety-related and that the Quality Assurance Program applied "as applicable". This was the case from the formation of the proposal to the customer over 4 years ago.

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The assemblies were treated as shipping containers for the pellets not as discrete SNM items. In effect, this operation was considered a "scrap" operation and was not deemed worthy of the same requirements applied to the manufacture of fresh fuel. This attitude developed and was not detected by senior management. The Management of the Lynchburg Manufacturing Facility of Framatome Cogema Fuels takes full responsibility for not detecting and correcting the attitude toward this work which caused the deficiencies in procedures, practices, compliance, and human performance.

It was clear to all, including project management, plant floor management, plant floor supervision, and manufacturing engineering, that this work did not need to be handled in the normal course of business. Essentially, FCF was trying to do a job that did not require full quality programs in the same facility where full Appendix B quality programs are required.

When combined with changing conditions, weak procedures, and an unusually long interval between training and execution, this attitude caused the event.

Our corrective actions are intended to make sure that in the future, all work involving SNM will receive full quality treatment and careful planning and management oversight.

Attitudes derived from unintended messages in everyday communications with the workforce by management also played a role in the misunderstanding of what was expected. Use of terms like "scrap", "fill-in work", and "must win", all send messages which can have unintended effects in the operation of a nuclear facility. These lessons learned are all targeted in the corrective actions.

I think the foregoing responds to your question about the overarching root cause. If you have any further questions, please contact me at (804) 832-5015.

Sincerely,

FRAMATOME COGEMA FUELS
Lynchburg Manufacturing Facility



Charles W. Carr
Vice President, Manufacturing and Field Service

CC: Mr. E. J. McAlpine - NRC Region II
Mr. Philip Ting - NRC- Operations Branch
Dr. Carl A Paperiello - NRC- Director NMSS