

LOCKHEED MARTIN

Gregory H. Baker
President

June 6, 1997
GDP-97-2006

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

Portsmouth Gaseous Diffusion Plant (PORTS)
Docket No. 70-7002
Response to Inspection Report (IR) 70-7002/97-002 Notice of Violation (NOV)

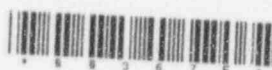
Nuclear Regulatory Commission (NRC) letter dated May 9, 1997, transmitted the subject Inspection Report (IR) that contained two violations involving three examples of failure to comply with Technical Safety Requirements. USEC's response to these violations is provided in Enclosures 1 and 2. Enclosure 3 lists the commitments made in this report. Unless specifically noted, the corrective actions specified in each enclosure apply solely to PORTS.

In page 8 of the IR, NRC states that the events that led to the NOV's were indicative of a generic problem with the plant staff's implementation of the TSRs. We concur with this concern and have taken positive actions to raise the staff's awareness and expectation for TSR compliance, to improve the plant's understanding of operability, and improve identified incomplete TSR procedures. Specifically, a senior manager of my staff was assigned to facilitate a management analysis into why TSR violations were occurring and determine the root causes of this negative trend. A TSR compliance enhancement plan was developed and is being implemented to address those awareness and expectation issues which led to our poor performance. The Plant Shift Superintendent (PSS) roles and responsibilities have been expanded to strengthen the command and control function providing greater control over operability evaluations related to TSR Mode changes. Additionally, as communicated in the attached responses, my staff is taking actions to improve weak TSR implementation procedures and we are committed to strengthen TSR implementation procedures as procedure weaknesses are identified.

I have taken a personal interest in improving TSR compliance and have communicated my expectations through meetings, articles, and personal discussions with my staff. I believe we are being responsive to this very important subject and I will continue my personal involvement to ensure plant personnel develop a questioning attitude which includes an improved awareness of TSR requirements, an increased level of knowledge related to regulatory compliance, and continued self-assessments to identify compliance weaknesses. Our goal is to achieve a high level of regulatory compliance through a position of self-regulation and control.

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U.S. Nuclear Regulatory Commission

June 6, 1997

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If you have any questions regarding this submittal, please contact Charly Blackston at (614) 897-3120.

Sincerely,

A handwritten signature in cursive script, appearing to read "Dale Allen".

Dale Allen
General Manager

DIA:CB

Enclosures

cc: Regional Administrator, Region III
NRC Resident Inspector - PORTS

U.S. Nuclear Regulatory Commissioner

June 6, 1997

Page Three

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Concurrence line

CRS / /97

Enclosure 1

UNITED STATES ENRICHMENT CORPORATION (USEC) REPLY TO NOTICE OF VIOLATION (NOV) 70-7002/97002-01

Restatement of Violation

Technical Safety Requirement (TSR) 3.2.2.a states that minimum staffing requirements for each facility are shown in Table 3.2.2-1.

TSR Table 3.2.2-1 requires that the minimal staffing level for the Tails Withdrawal Station have one assigned Operator during Modes II and III.

Contrary to the above, on March 21, 1997 between 2:00 p.m. and 2:30 p.m., there was no assigned Operator present at the Tails Station during Mode II.

I. Reasons for Violation

The reason for this violation was that a process/procedure was not in place to address manning requirements for the cascade facilities as outlined in the TSR Table 3.2.2-1 nor were these requirements flowed into the appropriate operating procedures. Contributing to the failure was the unavailability of TSRs at the floor level and a lack of understanding of the new TSR manning requirements by the facility's operating staff.

II. Corrective Actions Taken and Results Achieved

- 1) The TSR minimum staffing requirements were documented in the cascade facilities Daily Operating Instructions (DOI) and communicated to cognizant personnel in the three process buildings and Plant Control Facility (PCF).
- 2) Operators in the cascade buildings were briefed on the minimum staffing requirements specific to their facility to ensure operations personnel understood the manning requirements as stated in the TSR, the requirements of the DOI, and how these manning requirements are to be implemented.
- 3) Additional controlled TSR manuals were distributed to process areas in the X-333, X-330, X-326, and X-300 to make TSRs available at the floor level.

III. Corrective Steps to be Taken

- 1) USEC will develop a procedure that describes process facilities manning requirements, establishes a methodology of how minimum staffing levels are maintained, and designates a more descriptive area of operation for assigned personnel. This action item will be completed by June 30, 1997.
- 2) Once the procedure is complete and approved for use, appropriate operations personnel will be trained to ensure personnel adequately understand manning expectations. This action item will be completed by July 30, 1997.

IV. Date of Full Compliance

Full compliance was achieved when the TSR manning requirement at the Tails Withdrawal Station was restored at or about 2:30 p.m. on March 21, 1997. The corrective actions to mitigate/prevent recurrence will be completed by July 30, 1997.

Enclosure 2

UNITED STATES ENRICHMENT CORPORATION (USEC) REPLY TO NOTICE OF VIOLATION (NOV) 70-7002/97002-02

Restatement of Violation

Technical Safety Requirement (TSR) 1.6.2.2.d states that entry into an OPERATIONAL MODE that is applicable to the particular LIMITING CONDITION for OPERATION (LCO) shall not be made unless the conditions for the LCO are met without reliance on provisions contained in the ACTION statement.

TSR 2.7.3.13 and TSR 2.2.3.14 require DC control power for uranium hexafluoride stage motors to be operable for Mode II and Mode III.

TSR 2.2.3.1 requires the coolant high pressure relief system to be operable and their block valves verified open prior to entry into Modes II or III.

Contrary to the above, between March 3 and April 6, 1997, the plant entered Mode II with DC control power for uranium hexafluoride (UF_6) stage motors inoperable for four cells and without verifying that the coolant high pressure relief system block valves were open.

I. Reasons for Violation

The reason for the violation was a weakness in the process used to determine equipment operability at the time of transition to NRC oversight and inadequate administrative controls governing TSR LCOs. Specifically, operators relied upon surveillance data performed under DOE Operational Safety Requirements (OSRs) to confirm equipment operability under the new TSR specifications. However, the OSR surveillance data was not properly evaluated to ensure it satisfied the applicable TSRs prior to transition to NRC regulatory oversight. A similar condition with the High Pressure Fire Water System was self-identified and reported to NRC [Event Report 97-05] on April 9, 1997. Further discussion on each of the above examples is provided below:

Example 1:

On March 3, 1997, when USEC transitioned to NRC regulatory oversight, a condition existed in which the DC control power should have been declared inoperable because specific gravities in cells were documented as below the minimum acceptance specification of 1.180 specified in TSR surveillance requirements 2.7.3.13 and 2.2.3.14. This is because the surveillance procedure for battery cells, which existed prior to March 3, 1997, did not specify that a TSR LCO had to be entered if the specific gravity was below 1.180. Additionally, plant personnel did not perform an adequate review of this, and other, surveillances, to ensure the

conditions of the applicable TSR LCOs were satisfied prior to transition to NRC regulatory oversight.

Contributing to the error was the plant's lack of understanding of the difference between "operable" and "functional." Personnel believed that if a system was functional and was able to provide DC control power to the motor trip circuit, the system could be considered operable. This misinterpretation of the operability concept is contrary to management expectations and contrary to the Operability Determination procedure, UE2-TO-NS1032, currently in effect.

Example 2:

The second example describes a condition where personnel failed to recognize that restart and start-up of a cell from a "shut-down" state (Mode VI) are the same and have the same TSR limiting conditions for operation. Past practice allowed a cell to be quickly restarted when a cell tripped off-line if the cause of the trip was known and the brakes were verified disengaged. If a cell was shutdown (i.e., did not trip off-line), the cell would be started-up following a detailed prestart-up check which included verifying the Freon block valve was sealed open. In this example, where the cell tripped off-line, the application of the TSR requirement for the mode change was not clearly understood by cascade personnel.

II. Corrective Actions Taken and Results Achieved

- 1) All DC power control batteries that were identified on March 19, 1997 as being in an LCO have been restored to operable status in accordance with the new TSR procedures which were made effective as of March 3, 1997.
- 2) Systems Engineering performed a review of TSR surveillance test data submitted in preparation for transition to ensure that other systems were not inoperable due to failed surveillances. Identified discrepancies were documented on problem reports, reported to the PSS for an operability determination, and appropriate corrective actions were taken.
- 3) A Daily Operating Instruction (DOI) has been written to address the implementation of TSR required actions when an LCO condition is entered or mode changes occur. The DOI establishes a consistent approach to LCO monitoring and tracking by instructing the PSS to verify TSR required actions and surveillances are completed each time an LCO condition is entered. To document the approval the PSS reviews the TSR requirements and logs the condition in the PSS logbook and instructs the field organizations to document the same information in their operating logs.
- 4) Status Boards are also used to make LCO conditions very visible to the PSS and others in the control room.

- 5) A briefing was held with each PSS to communicate management's expectations related to surveillance testing and operability, TSR Limiting Conditions of Operation, LCO tracking and documentation, and mode changes.
- 6) LCOs are tracked on the Daily Status Report issued each morning by the PSS. The report communicates to management across plant site the condition and status of the plant.
- 7) Operations First Line Managers have been briefed by their Group Managers on how surveillances relate to operability and how Limiting Conditions of Operations are entered.

III. Corrective Steps to be Taken

- 1) A procedure is currently being developed which will establish a formal program to control LCOs. The procedure will provide guidance for the tracking of Limiting Conditions for Operations. The use of this tracking program will establish a process to ensure compliance with the TSR. The procedure is expected to be completed by August 30, 1997.
- 2) Once the procedure is complete and approved for use, appropriate operations personnel will be trained to ensure personnel adequately understand the LCO tracking process. This action item is expected to be completed by September 30, 1997.

Additional corrective actions concerning a similar condition are documented in Event Report 97-05 and were forwarded to the United States Nuclear Regulatory Commission under cover letter dated May 9, 1997 from Mr. Dale Allen, General Manager.

IV. Date of Full Compliance

USEC is in full compliance with the TSRs as confirmed by the in-depth engineering review of TSR surveillance data completed May 30, 1997. The corrective actions to prevent recurrence will be completed by September 30, 1997.

Enclosure 3

**UNITED STATES ENRICHMENT CORPORATION (USEC)
LIST OF COMMITMENTS 70-7002/97002**

NOV 97002-01

- 1) USEC will develop a procedure that describes process facilities manning requirements, establishes a methodology of how minimum staffing levels are maintained, and designates a more descriptive area of operation for assigned personnel. This action item will be completed by June 30, 1997.
- 2) Once the procedure is complete and approved for use, appropriate operations personnel will be trained to ensure personnel adequately understand manning expectations. This action item will be completed by July 30, 1997.

NOV 97002-02

- 1) A procedure is currently being developed which will establish a formal program to control LCOs. The procedure will provide guidance for the tracking of Limiting Conditions for Operations. The use of this tracking program will establish a process to ensure compliance with the TSR. The procedure is expected to be completed by August 30, 1997.
- 2) Once the procedure is complete and approved for use, appropriate operations personnel will be trained to ensure personnel adequately understand the LCO tracking process. This action item is expected to be completed by September 30, 1997.