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

October 29, 2021

Mr. Wyatt Padgett
Compliance and Licensing Manager
LOUISIANA ENERGY SERVICES (LES) dba URENCO USA
URENCO USA
P.O. Box 1789
Eunice, NM 88231

SUBJECT: URENCO USA – INTEGRATED INSPECTION REPORT 07003103/2021003

Dear Mr. Padgett:

On September 30, 2021, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection at URENCO USA (UUSA) and discussed the results of this inspection with you and other members of your staff. The results of this inspection are documented in the enclosed report.

Based on the results of this inspection, the NRC has determined that one Severity Level IV violation of NRC requirements was identified during the inspection. Because UUSA has an NRC-approved corrective action program, placed the violation into their corrective action program, and restored compliance, this violation is being treated as a non-cited violation (NCV) consistent with Section 2.3.2a of the Enforcement Policy. The NCV is described in the subject inspection report. If you contest the violation or the significance or severity of the violation documented in this inspection report, you should provide a response within 30 days of the date of this inspection report, with the basis for your denial, to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555-0001; with copies to the Regional Administrator, Region II; the Director, Office of Enforcement; and the NRC Resident Inspector at URENCO USA.

This letter, its enclosure, and your response (if any) will be made available for public inspection and copying at http://www.nrc.gov/reading-rm/adams.html and at the NRC Public Document

Room in accordance with Title 10 of the *Code of Federal Regulations* 2.390, “Public Inspections, Exemptions, Requests for Withholding.”

Sincerely,

/RA/

Cynthia D. Taylor, Chief (Acting)
Projects Branch 1
Division of Fuel Facility Inspection

Docket No. 07003103
License No. SNM-2010

Enclosure:
As stated

cc w/ encl: Distribution via LISTSERV®

SUBJECT: URENCO USA – INTEGRATED INSPECTION REPORT 07003103/2021003
DATED October 29, 2021

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ADAMS ACCESSION NUMBER: **ML21302A040**

X SUNSI Review		X Non-Sensitive ☐ Sensitive		X Publicly Available ☐ Non-Publicly Available	
OFFICE	RII/DFFI	RII/DFFI	RII/DFFI		
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DATE	10/26/21	10/26/21	10/29/2021		

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U.S. NUCLEAR REGULATORY COMMISSION
Inspection Report

Docket Number:	07003103
License Number:	SNM-2010
Report Number:	07003103/2021003
Enterprise Identifier:	I-2021-003-0118
Licensee:	LOUISIANA ENERGY SERVICES (LES) dba URENCO USA
Facility:	URENCO USA
Location:	Eunice, NM
Inspection Dates:	August 09 - 12 and September 13 - 16, 2021
Inspectors:	B. Adkins, Sr. Fuel Facility Project Inspector L. Cooke, Fuel Facility Inspector T. Sippel, Fuel Facility Inspector P. Startz, Fuel Facility Inspector
Approved By:	Cynthia D. Taylor, Chief (Acting) Projects Branch 1 Division of Fuel Facility Inspection

Enclosure

SUMMARY

The U.S. Nuclear Regulatory Commission (NRC) continued monitoring the licensee's performance by conducting an integrated inspection at URENCO USA (UUSA), in accordance with the fuel cycle facility inspection program. This is the NRC's program for overseeing the safe operation of licensed fuel cycle facilities. Refer to https://www.nrc.gov/materials/fuel-cycle-fac.html for more information.

List of Violations

Criticality Accident Alarm System (CAAS) inaudibility not reported	
Significance	Report Section
Severity Level (SL) IV Non-Cited Violation (NCV) 07003103/2021003-01 Open/Closed	88015
The NRC inspectors identified a SL-IV NCV of the reporting requirements in 10 Code of Federal Regulation (CFR) 70.50(b)(2).	

Additional Tracking Items

None.

INSPECTION SCOPES

Inspections were conducted using the appropriate portions of the inspection procedures (IPs) in effect at the beginning of the inspection unless otherwise noted. Currently approved IPs with their attached revision histories are located on the public website at http://www.nrc.gov/reading-rm/doc-collections/insp-manual/inspection-procedure/index.html. Inspections were declared complete when the IP requirements most appropriate to the inspection activity were met consistent with Inspection Manual Chapter (IMC) 2600, "Fuel Cycle Facility Operational Safety and Safeguards Inspection Program." The inspectors reviewed selected procedures and records, observed activities, and interviewed personnel to assess licensee performance and compliance with Commission rules and regulations, license conditions, site procedures, and standards.

SAFETY OPERATIONS

88015 - Nuclear Criticality Safety

The inspectors evaluated selected aspects of the licensee's Nuclear Criticality Safety (NCS) program to verify compliance with selected portions of 10 Code of Federal Regulation (CFR) 70, including 70.24, 70.50, 70.61, 70.62, and Chapter 5, "Nuclear Criticality Safety," of the facility's safety analysis report (SAR), and applicable licensee procedures.

Criticality Analysis (IP Section 02.01)

The inspectors interviewed licensee staff and reviewed nuclear criticality safety analyses (CSAs), and associated documentation, to verify compliance with 10 CFR 70 and applicable sections of the SAR, including, 5.1.2, 5.2.1.3, and 5.2.1.4. Specifically, the inspectors interviewed licensee staff and reviewed the following:

- NCS-CSA-006, "Criticality Safety Analysis of the Product Vent Pump and Chemical Trap Set," Revision (Rev.) 10, because it contained a variety of calculations and information supporting the licensee's evaluation of Safe-By-Design (SBD) components in the Product Liquid Sampling and Product Takeoff Systems

Criticality Implementation (IP Section 02.02)

The inspectors selected SBD controls from the licensee's integrated safety analysis summary (ISAS) to verify proper implementation through a review of process and system descriptions, records, and plant walkdowns to verify compliance with 10 CFR 70 and applicable sections of the SAR, including 3.2.5.2. Specifically, the inspectors performed the following activities:

- reviewed SBD verification (SBDV) forms and nuclear safety releases (NSRs) performed by the licensee for the product liquid sampling and product takeoff systems;
- walked down NCS postings and storage areas for fissile baring waste in the cylinder receipt and dispatch building (CRDB); and
- walked down favorable geometry accumulation points (e.g., traps) in the product liquid sampling and product takeoff systems.

Criticality Operational Oversight (IP Section 02.03)

The inspectors assessed the NCS staff's oversight of plant operators, procedures, and operations of systems involving special nuclear material to verify compliance with 10 CFR 70 and applicable sections of the SAR. Specifically, the inspectors performed the following activities:

- reviewed the criticality general employee training (GET)/computer-based training (CBT) material for compliance with Chapter 11 of the SAR;
- walked down the product liquid sampling and product takeoff systems with a qualified NCS engineer; and
- observed a licensee NCS support staff member conduct a weekly walkthrough audit of the separations building module (SBM)-1003 criticality accident alarm system (CAAS).

Criticality Programmatic Oversight (IP Section 02.04)

The inspectors reviewed NCS program procedures, and NCS staff qualifications to verify compliance with 10 CFR 70 and applicable sections of the SAR, including 2.2.3.F, 5.1.1, and 5.1.5. Specifically, the inspectors interviewed licensee NCS staff and reviewed the following documents:

- procedure used for non-destructive verification of materials used in SBD components (QA-3-3000-36);
- qualification guides for licensee NCS engineers and NCS support staff (E-NCS-QG, and E-NCS-SS);
- training records for NCS staff; and
- annual continuing training records for a senior NCS engineer.

Criticality Incident Response and Corrective Action (IP Section 02.05)

The inspectors reviewed the licensee's CAAS, criticality emergency response procedures, and corrective action program (CAP) to verify compliance with 10 CFR 70. Specifically, the inspectors performed the following activities:

- reviewed a sampling of CAAS and NCS-related CAP entries since the last NCS inspection;
- reviewed records of recent maintenance and testing of the CAAS, specifically work orders (WOs) 1000489860 and WO 1000500490;
- interviewed licensee NCS and radiological protection (RP) staff concerning recent NCS drills, and their roles in emergency response;
- walked down RP equipment that would be used during and after potential criticality accidents; and
- reviewed a sample of emergency action plans, including the instructions and evacuation maps to follow during a CAAS activation.

88020 - Operational Safety

The inspectors evaluated selected aspects of the licensee's Operational Safety program to verify compliance with selected portions of 10 CFR 70, including 70.61, 70.62, and Chapter 11, "Management Measures," of the facility's SAR, and applicable licensee procedures.

Identification of Safety Controls and Related Programs (IP Section 02.01)

The inspectors selected specific process areas for inspection based on the safety basis information of the facility, the risk and safety significance of the process areas, the description of plant changes submitted to the NRC, and past plant performance documentation. For the process areas of interest, the inspectors selected a sample of accident sequences in fire safety and chemical safety based on the information provided in the ISAS. The inspectors conducted a general plant tour of each major plant operating area. The process areas and accident sequences selected for review are listed below:

- FF-WORKER-EVAC, fire involving excessive transient combustibles within the area or a fire propagating into the area of concern that could result in a fire of sufficient magnitude that results in a release of uranium hexafluoride (UF6);
- FF6-1, fire propagating into the CRDB general areas from other areas that could result in a release of UF6 inventory;
- FF15-1, fire propagating into the UF6 handling area from other areas that could result in a release of uranium material;
- PB4-2, product liquid sampling autoclave heater fails causing heater to remain on resulting in cylinder and autoclave failure and release of UF6 inventory; and
- PT2-1, product low temperature takeoff station heater defrost controller heater fails causing cylinder and autoclave failure and release of UF6 inventory.

Review of Safety Controls and Related Programs (IP Section 02.02)

The inspectors reviewed information related to administrative and engineered safety controls or items relied on for safety (IROFS) for the accident sequences selected above, including the identification of the licensee's assumptions and bounding cases as they apply to each of the selected accident sequences, safety controls, or IROFS. This review was performed to verify that the controls or IROFS were available and reliable to perform their intended safety functions and that the design basis assumptions were reflected in the actual conditions in the field. The specific safety controls selected for review are listed below:

- IROFS1, automatic trip of a defrost heater and fan on high internal temperature to ensure cylinder integrity (RTD), active engineered control; chemical safety;
- IROFS2, automatic trip of a defrost heater and fan on high internal temperature to ensure cylinder integrity (thermocouple); active engineered control, chemical safety; IROFS11, automatic trip of the autoclave heater and fan on high internal temperature to ensure product liquid sampling autoclave integrity; active engineered control, chemical safety;
- IROFS12, automatic trip of the autoclave heater and fan on high autoclave internal pressure to ensure product liquid sampling autoclave integrity; active engineered control, chemical safety;

- IROFS 35, automatic closure of fire-rated barrier opening protectives (fire dampers), administrative control, fire and chemical safety; and
- IROFS39b, administratively limit exposure by requiring operator action to evacuate the area of concern to ensure worker consequences of inhalation of uranic material and hydrogen fluoride (HF) are low; administrative control, fire and chemical safety.

Implementation of Safety Controls (IP Section 02.03)

For the selected safety controls listed above, the inspectors reviewed management measures to verify proper implementation in accordance with 10 CFR 70 and applicable sections of the SAR. This review was performed to verify that selected safety controls or IROFS were present, available, and reliable to perform their safety function and that the design basis assumptions were reflected in the actual conditions in the field. The inspectors conducted the following activities to verify the implementation of selected safety controls:

- reviewed maintenance procedure MA-3-3400-11 and observed the annual IROFS1/2 surveillance test for station 1003-434-7B3;
- reviewed IROFS11/12 engineering setpoint calculations associated with accident sequence PB4-2;
- reviewed records to determine if IROFS35 fire dampers were properly tested in accordance with National Fire Protection Association (NFPA) 90A requirements; and
- conducted interviews and reviewed training records to determine if personnel were knowledgeable of evacuation and incipient firefighting procedures as specified in the boundary definition for IROFS39b.

Safety Control Support Programs (IP Section 02.04)

The inspectors assessed additional management measures that support the availability and reliability of the selected safety controls to verify these were implemented in accordance with 10 CFR 70 and applicable sections of the SAR. Specifically, the inspectors performed the following:

- reviewed WO 1000366586 for IROFS35 and WOs 1000420321/1000438976 for IROFS 11 and 12 to determine if the licensee was adequately performing IROFS-related functional testing at the proper frequency;
- reviewed the following CAP entries to ensure the licensee was entering items at the proper threshold and correcting conditions adverse to quality and safety: event (EV) 123337, 137862, 146038, 145904, 145835, 144688, 144687, 143321, 143082, 140675;
- attended the plan of the day meeting on 08/10/2021 to determine if the licensee was adequately controlling work and addressing operational deficiencies;
- reviewed the operations department organizational chart for compliance with Chapter 2 of the SAR;

- performed interviews of five plant operators to determine their knowledge related to IROFS39b including the required actions they would take in the event of a fire; and
- observed operations shift turnover on 08/10/2021.

88055 - Fire Protection

The inspectors evaluated selected aspects of the licensee's fire protection program to determine whether the operational status, material condition and design of fire protection systems met the applicable requirements of 10 CFR 70, Chapter 7, "Fire Safety," of the facility's SAR, and applicable licensee procedures.

Selection of Inspection Samples (IP Section 02.01)

The inspectors reviewed licensing documents to select a sample of fire protection features in risk-significant areas and processes, including ROFS and their respective management measures (where applicable). The inspectors also selected licensee activities that support the implementation of the fire protection program based on the program description included in the SAR. Specifically, the inspectors performed the following:

- observed a weekly IROFS36A combustible material loading walkdown by operations personnel;
- observed maintenance and post maintenance testing on IROFS35 fire doors under WOs 1000496137 and 1000496138;
- observed hot work practical training including use of fire extinguishers;
- interviewed one control room operator and one control room supervisor regarding operation of the fire water system; and
- reviewed electronic operating logs to determine if the licensee was maintaining minimum fire water tank levels.

Preventative Controls (IP Section 02.02)

The inspectors interviewed licensee staff, reviewed documentation, and conducted plant walk-downs to verify the licensee's controls for transient combustibles and ignition sources met the license requirements and applicable requirements in 10 CFR 70. Specifically, the inspectors conducted the inspection activities listed below:

- interviewed licensee operators and engineers, reviewed records of walkdowns, and conducted plant walk-downs in the CRDB, SBM-1001 and other areas to verify controls for transient and fixed combustible material were being implemented in accordance with procedural requirements;
- conducted plant walk-downs, interviewed engineers and maintenance personnel, and reviewed records to verify ignition sources were controlled in accordance with procedural requirements; and
- reviewed records of hot work conducted to verify that compensatory measures were taken and that hot work permits were renewed daily.

Fire and Gas Detection and Alarm Systems (IP Section 02.03)

The inspectors reviewed selected fire detection devices to verify that detection and alarm systems were able to detect the minimal fire within the required time and initiate the safety function credited in the SAR. Specifically, the inspectors conducted the inspection activities listed below:

- interviewed licensee engineers and reviewed records related to the VESDA system; and
- conducted plant walk-downs in SBM-1001 to verify fire detection and alarm systems were installed and maintained as required.

Suppression Systems and Activities (IP Section 02.04)

The inspectors interviewed license engineers, reviewed fire protection program documents, and conducted plant walk-downs to verify that suppression systems were capable of performing the safety function credited in the SAR, and/or the ISAS. Specifically, the inspectors performed the following activities:

- interviewed licensee engineers, reviewed event reports and maintenance WOs, and walked down the fire water tanks and fire water pump house to verify the licensee-maintained fire suppression systems;
- interviewed licensee engineers and maintenance personnel, reviewed the licensee's pre-fire plan, and conducted walk-downs in the CRDB and SBM-1001 to verify the licensee maintains firefighting equipment (e.g., fire extinguishers, fire risers) in designated locations; and
- walked down areas where water-based suppression was prohibited due to criticality or electrical hazards to verify that water-based suppression systems were not present.

Passive Fire Protection Features (IP Section 02.05)

The inspectors reviewed selected passive fire protection features to verify these were in a proper material condition to perform the safety function credited in the SAR, or the ISAS. Specifically, the inspectors performed the following:

- interviewed licensee operators, engineers and maintenance personnel; reviewed impairments, procedures, and WOs; and conducted walk-downs and observed maintenance to verify that IROFS35 fire doors meet the license and ISA requirements; and
- interviewed licensee engineers and maintenance personnel; reviewed training, condition reports, and procedures to verify ventilation fire dampers met license and ISA requirements.

Fire Protection Program Elements (IP Section 02.06)

The inspectors reviewed selected fire protection program elements to verify compliance with the license requirements. Specifically, the inspectors completed the following activities:

- interviewed licensee engineers and reviewed training material and impairment records to verify that compensatory measures (e.g., a fire watch) were imposed when IROFS were impaired;
- reviewed records and conducted interviews to verify that site fire brigade training and drills were conducted in accordance with license requirements;
- interviewed licensee fire protection staff and the manager responsible for fire protection to verify the staffing level, training, and experience of the fire protection organization met license requirements;
- observed emergency lighting test in SBM 1005/1006 under WO 1000465232;
- reviewed the current and previous versions of the pre-fire plan, and conducted walk-downs in SBM-1001 to verify changes to the pre-fire plans were consistent with the license requirements and that the pre-fire plan matched conditions in the field; and
- reviewed memoranda of understanding (MOU) with the city of Eunice and city of Hobbs fire departments to verify that they were renewed periodically.

Identification and Resolution of Problems (IP Section 02.07)

The inspectors reviewed the licensee's identification and resolution of fire protection issues to verify compliance with the license requirements. Specifically, the inspectors reviewed the following CAP entries, audits, and self-assessments:

- EV 120693, 123647, 127052, 137600, 140151, 140416, 140595, 140598, 140701, 140834, 140937, 141490, 142826, 142899, 143194, 143324
- ER-2013-2390; and
- fire protection audit 2020-A-09-015 and associated EVs.

RADIOLOGICAL CONTROLS

86740 - Inspection of Transportation Activities

The inspectors evaluated select aspects of the licensee's Transportation Activities program to determine whether the licensee has established and is maintaining an effective, management-controlled program; to ensure radiological and nuclear safety in the receipt, packaging, delivery to a carrier and, as applicable, the private carriage of licensed radioactive materials; and to determine whether transportation activities are in compliance with the applicable NRC 10 CFR Parts 20 and 71 regulations and Department of Transportation (DOT) (49 CFR Parts 171-178) transport regulations.

The inspectors examined the licensee's procedures and shipment records and observed actual package preparations and operations to verify compliance with the regulations above. Specifically, the inspectors reviewed or observed the following:

- receipt contamination surveys and physical inspections of 48Y cylinders on the uranium byproduct cylinder (UBC) storage pad;

- crane operations involving the handling of 48Y and 30B cylinders;
- radiological survey of Hitman 962/Trailer # L00024;
- shipping documentation for 72 drums solid waste/10 poly cubes of liquid waste;
- shipping documentation for radioactive-low specific activity (LSA) solid/liquid wastes for treatment/disposal; and
- shipment preparations of six truckloads of UF6 30B cylinders/overpacks.

Preparation of Packages for Shipment (IP Section 02.01)

The inspectors examined the licensee's procedures and package preparations to verify compliance with federal regulations and licensee procedures LO-3-3000-01, "Transport Planning" and RW-3-1000-13, "Shipping Radioactive and Mixed Waste". Specifically, the inspectors reviewed the following:

- shipping document package and final placarding/verifications for a shipment of six full 30B cylinders including their UX-30 overpacks;
- cylinder internal inspections/pressure test records (IROFS16a) in accordance with LO-3-1000-04, "Cylinder Release for Use", Rev. 3; and
- cylinder external inspections including cylinder valve acceptance criteria in accordance with LO-3-2000-01, "External Cylinder Inspection", Rev. 19.

Delivery of Completed Packages to Carriers (IP Section 02.02)

The inspectors examined the licensee's procedures and shipment records and observed actual transport activities to determine that the licensee met package delivery regulations and Chapter 11.0 of the SAR. Specifically, the inspectors reviewed or observed the following:

- "Shipping Manifest 0918-02-0003, Shipment of 72 Drums Radioactive-LSA-II, UN3321, Fissile Excepted (DAW), to Energy Solutions," dated 12/4/2020;
- "Shipping Manifest 0918-02-0003, Manifest Tracking 019278840 JJK, Shipment of 10 Poly Totes of Radioactive Solutions for Treatment and Disposal, Radioactive-LSA-II, UN3321, Fissile Excepted D002/D007, to Energy Solutions," dated 10/28/2019; and
- "Shipping Manifest 0918-01-0004, Manifest Tracking 019278841, Shipment of 10 Poly Totes of Radioactive Solutions for Treatment and Disposal, Radioactive-LSA-II, UN3321, Fissile Excepted, D002/D007, to Energy Solutions," dated 10/25/2019.

Receipt of Packages (IP Section 02.03)

The inspectors examined the licensee's procedures to verify compliance with 10 CFR 20.1906 and Section 11.4 of the SAR. Specifically, the inspectors reviewed the following:

- LO-3-2000-01, "Receipt and Shipping of Cylinders," Rev. 24;
- LO-3-2000-03, "On-Site Handling of UF6 Cylinders," Rev. 14 for compliance with IROFS 36c/e;

- samples of incoming and outgoing radiological surveys for compliance with RP-4-1000, “Radioactive Shipment Surveys;” and
- records of internal inspections (IROFS 16a) for incoming empty cylinders completed in accordance with LO-3-1000-04, "Cylinder Release for Use, Rev. 3.

Records and Reports (IP Section 02.04)

The inspectors examined the licensee’s recordkeeping and reports to verify compliance with the regulations above, Chapter 11.0 of the SAR, and Section 6 of the QAPD. Specifically, the inspectors reviewed the following:

- “Certificate of Receipt for Manifest 0918-01-0004, Manifest Tracking 019278841 for Disposal,” dated 10/28/2019;
- “Certificate of Receipt for Manifest 0918-01-0003, Manifest Tracking 019278840 JJK for Disposal,” dated 10/28/2019;
- “Nuclear Material Transaction Report Form 741, Manifest 0918-01-0003,” dated 10/24/2019; and
- “Special Nuclear Material Exemption Certification,” dated 10/22/2019.

General License Requirements (IP Section 02.05)

The inspectors reviewed licensee package certifications utilized for shipment of radioactive material packages to verify compliance with 10 CFR 71, Subpart C, and Chapter 11.0 of the SAR. Specifically, the inspectors reviewed the following:

- “Model UX-30 Certification Type B (U) F Fissile Package Design Certificate USA/9196/B (U) F-96,” Rev. 34.; and
- “Model 30B Certification Type AF Fissile Package Design Certificate USA/0411/AF-96,” Rev. 12.

Management Controls (IP Section 02.06)

The inspectors reviewed the system of management controls for transportation activities to verify compliance with Chapter 11.0 of the SAR. Specifically, the inspectors reviewed the following:

- LO-4-2000-03, “Inbound 30B and 48Y Release Desktop Guide”, Rev. 9;
- 0023-BSH-2016-001, “Package Design Safety Report for Package Design DN-30,” Rev. 3; and
- LCTP-21-04, “Management Assessment of UF6 Incident During Transport,” Rev. 0.

Indoctrination and Training Program (IP Section 02.07)

The inspectors reviewed training and indoctrination documentation to verify compliance with Chapter 11 of the licensee application. Specifically, the inspectors reviewed:

- training records showing completion of the class titled "Transportation Radioactive Materials" for three UUSA employees involved in transportation of radioactive waste

Quality Assurance Program (IP Section 02.08)

The inspectors reviewed the quality assurance documents to verify compliance with 10 CFR 71.137, Section 2.3.5.2 of the SAR, and the QAPD. Specifically, the inspectors reviewed:

- UX-30-OMM, “Columbia Hi Tech, UX-30 Operation and Maintenance Manual,” Rev. 1; and
- UX-30 Manual, “Columbia Hi Tech, Manufacturer’s Practices to Insure Regulatory Compliance and Longer Useful Life,” Rev. 0.

Audit Program (IP Section 02.09)

The inspectors reviewed the assessment reports to verify compliance with 10 CFR 71.137 and Section 11.5 of the SAR and Section 18 of the QAPD. Specifically, the inspectors reviewed:

- UUSA Audit 2021-A-02-003, “Logistics and Transportation,” dated April 9, 2021

Procurement and Selection of Packagings (IP Section 02.10)

The inspectors examined the licensee’s packaging, including those provided from a vendor and revised procedures and records to verify compliance with the federal regulations above, Section 11.2 of the SAR, and Section 14 of the QAPD. Specifically, for packaging that is used by the licensee to transport or to deliver licensed material to a carrier for transport, the inspectors reviewed the following:

- records associated with IROFS 16a cylinder internal inspections/pressure testing records in accordance with LO-3-1000-04, “Cylinder Release for Use”, Rev. 3; and
- “Model 30B Certification Type AF Fissile Package Design Certificate USA/0411/AF-96,” Rev. 12.

Preparation of Packages for Shipment (IP Section 02.11)

The inspectors examined the licensee’s package markings and documentation to verify compliance with applicable parts of the federal regulations above and Section 13 of the QAPD. Specifically, the inspectors reviewed the following:

- LO-3-3000-01, “Transport Planning,” Rev. 25; and
- RP-3-5000-01, “Radioactive Material Shipment Surveys.”

Periodic Maintenance of Packagings (IP Section 02.12)

The inspectors examined the licensee’s records to verify compliance with applicable parts of the federal regulations above. Specifically, the inspectors reviewed the following:

- calibration records for torque wrenches and thread “go” and “no-go” gauges used on UF6 cylinders

Records, Reports, and Notifications (IP Section 02.13)

The inspectors reviewed the licensee’s records and procedures for recordkeeping and reports to verify that a system is in place to verify compliance with the federal regulations and Chapter 11 of the SAR. Specifically, the inspectors reviewed the following:

- EV 140329, involved an error in calculating trace radionuclide content of solid low-level waste was discovered during database testing;
- EV 140435, involved improper removal of cylinder tamper indicating devices (TIDs) from System Applications and Products (SAP) computer database; and
- EV 144742, involved multiple issues including containers not listed in uranium accounts, TID accounting issues, TID on wrong cylinder in SAP, and multiple cylinders with TIDs applied in SAP that were no longer physically applied to the cylinder.

88045 - Effluent Control and Environmental Protection

The inspectors evaluated selected aspects of the licensee’s environmental protection program to verify compliance with selected portions of 10 CFR 20, Part 70, and the facility’s SAR.

Program Implementation (IP Section 02.01)

The inspectors reviewed any significant changes to the effluent control and environmental protection program, discussed with the licensee any new unplanned releases or contamination identified, and screened the CAP in order to verify the environmental protection program was being implemented in compliance with license requirements. Specifically, the inspectors reviewed the following documents and/or performed the following activities:

- accompanied licensee environmental and radiological staff for demonstrations on use of operating exhaust stack particulate sampling equipment, use of operating perimeter ambient air particulate samplers; collection of sample media from the equipment, and analysis of the collected samples; and
- accompanied licensee environmental and radiological staff for demonstrations of collecting water and other environmental samples including vegetation sampling, soil sampling, storm water retention and detention basin sediment

sampling, and sanitary wastewater samples collected from the main sanitary lift station.

Training (IP Section 02.05)

The inspectors conducted interviews, reviewed training and indoctrination documentation, and directly observed activities of the environmental and radiological staff performing environmental activities, to evaluate the licensee's compliance with Section 11.3 of the SAR. Specifically, the inspectors reviewed the following:

- Department training records for environmental and radiological staff;
- Procedure TQ-3-0100-13, “Training and Qualification Guidelines,” Rev. 12
- “UUSA Maestro Training Reference Guide,” dated 2021;
- Procedure EN-3-2020-01, “EN Air Sampling,” Rev. 7; and
- Procedure EN-3-2020-02, “EN Media Sampling,” Rev. 8.

Effluent Monitoring (IP Section 02.09)

The inspectors observed effluent monitoring systems exhaust stacks from the upstream gaseous exhaust ventilation system (GEVS) systems, discussed calibration and maintenance with the radiological staff to verify compliance with the regulation and Chapter 9.0 of the SAR. Specifically, the inspectors completed the following activities:

- reviewed WO 1000449078, “Alpha Monitor Cartridge Change, (air sampler media) for exhaust stacks UN-NEF-1001-562-1MA1 through UN-NEF-1005-562-1MA2,” dated 12/21/2020;
- reviewed WO 1000466180, “Alpha Monitor Cartridge Change, (air sampler media) for exhaust stacks UN-NEF-1001-562-1MA1 through UN-NEF-1005-562-1MA2,” dated 7/6/2021;
- reviewed WO 1000466176, “Alpha Monitor Cartridge Change, (air sampler media) for exhaust stacks UN-NEF-1001-562-1MA1 through UN-NEF-1005-562-1MA2,” dated 3/3/2021; and
- observed air sampling conducted in accordance with procedure EN-32020-01, “EN Air Sampling,” Rev. 7.

Environmental Sampling (IP Section 02.13)

The inspectors reviewed environmental sampling related to ambient air, and sanitary sewer, to verify compliance with 10 CFR 20.1501 and Chapter 9.0 of the SAR. Specifically, the inspectors completed the following activities:

- walked down air and water environmental sample points including a GEVS air exhaust stack sampler/equipment, ambient air samplers located around the perimeter of the facility, several retention and detention basins for stormwater runoff/condensate from air conditioning, and the final sanitary lift station sampling location;

- walked down the I-Matic automatic low background (radionuclide) counting system located in the main laboratory and confirmed the presence of quality control standard sources: thorium 230 alpha source and a technetium beta source, as required by the operating procedure EN-3-3030-01;
- reviewed procedure EN-3-2020-01, “EN Air Sampling,” Rev. 7;
- reviewed procedure EN-3-2020-02, “EN Media Sampling,” Rev. 8;
- reviewed WO 1000449078, “Alpha Monitor Cartridge Change, (air sampler media) for exhaust stacks UN-NEF-1001-562-1MA1 through UN-NEF-1005-562-1MA2,” dated 12/21/2020;
- reviewed WO 1000466180, “Alpha Monitor Cartridge Change, (air sampler media) for exhaust stacks UN-NEF-1001-562-1MA1 through UN-NEF-1005-562-1MA2,” dated 7/6/2021; and
- reviewed WO 1000466176, Alpha Monitor Cartridge Change, (air sampler media) for exhaust stacks UN-NEF-1001-562-1MA1 through UN-NEF-1005-562-1MA2,” dated 3/3/2021.

Radioactive Waste Classification, Characterization, and Storage (IP Section 02.15)

The inspectors reviewed documentation and records of facility activities and observed posting and labeling of storage areas and containers to verify compliance with the requirements of 10 CFR 61.55 and the Section 12.6.1.5 of the SAR. Specifically, the inspectors performed the following:

- walked down the liquid effluent collection and transfer system, the bulk storage tank, the multifunction decontamination train, the vacuum pump rebuild workshop and associated area to determine compliance with labeling of containers that hold radioactive waste solutions derived from equipment decontamination and refurbishment activities;
- reviewed records and conducted a walkdown of the bulk storage tank, the multifunction decontamination train, the vacuum pump rebuild workshop and associated areas to determine compliance with mass limits for IROFS55a and IROFS55b controls as described in the ISA Summary Section 3.5.12, and SAR Section 12.6.1.5.

INSPECTION RESULTS

<table>
<tr><td colspan="2">CAAS inaudibility not reported</td></tr>
<tr><td>Severity</td><td>Report Section</td></tr>
<tr><td>Severity Level (SL) IV
Non-Cited Violation (NCV)
07003103/2021003-01
Open/Closed</td><td>88015</td></tr>
<tr><td colspan="2">The NRC inspectors identified a SL-IV NCV of the reporting requirements in 10 CFR 70.50(b)(2).</td></tr>
<tr><td colspan="2">Description: One July 20, 2021, during the 2021 annual CAAS maintenance, licensee employees identified that the CAAS was not clearly audible in room 242 of the Technical Services Building (TSB). This was documented in the licensee's CAP as EV 147490. On July 21, 2021, the licensee screened this event as not reportable because "Compensatory</td></tr>
</table>

measures which achieve an equivalent safety function were established within 24hrs following the identification of the alarms in the TSB not being clearly audible."

The CAAS is required by 10 CFR 70.24(a) and license commitments to mitigate the consequences of a criticality accident by ensuring that all personnel withdraw to an area of safety upon the sounding of the alarm. In 10 CFR 70.24 the CAAS is required to be "clearly audible". Employees conducting the tests could not hear the alarm and sound pressure readings taken while the CAAS was alarming were only about one decibel dB above those taken while the CAAS was off. Prior to the time of discovery no redundant equipment was available and operable. No other locations were identified where the CAAS was not clearly audible.

This issue is considered an isolated failure to report as no other examples of failures to report were found during this inspection, or recent inspections involving radiological protection or nuclear criticality safety.

Corrective Actions: On September 17, 2021, the licensee notified the NRC Headquarters Operations Officer in accordance with 10 CFR 70.50(b)(2); which is documented in EN55480, CAAS Alarm Not Clearly Audible**.**

Corrective Action References: This issue was entered into the licensee's CAP as EV 148123.

Analysis: The regulations in 10 CFR 70.50(c)(1) require, in part, that "Licensees shall make reports required by paragraphs (a) and (b) of this section ... to the NRC Operations Center."

10 CFR 70.50(b) "*Twenty-four hour report*" requires, in part, that "Each licensee shall notify the NRC within 24 hours after the discovery of any of the following events involving licensed material: ... (2) An event in which equipment is disabled or fails to function as designed when:
(i) The equipment is required by regulation or licensee condition to ... mitigate the consequences of an accident;
(ii) The equipment is required to be available and operable when it is disabled or fails to function; and
(iii) No redundant equipment is available and operable to perform the required safety function."

In this instance, the CAAS failed to function as designed as required by 10 CFR 70.50(b)(i) by failing to provide a clearly audible evacuation alarm in TSB room 242 as required by 10 CFR 70.24 to mitigate the consequences of an accident. In addition, the CAAS was required to be available and operable, both when the failure was found, and during any prior period of inaudibility; therefore, criteria (ii) of 10 CFR 70.50(b)(2) was met. At and before the time of discovery, no redundant equipment was available and operable to perform the required safety function of the CAAS in TSB room 242; therefore, criteria (iii) of 10 CFR 70.50(b)(2) was satisfied. Because all the criteria in 10 CFR 70.50(b)(2) were met, a report should have been made to the NRC in accordance with 10 CFR 70.50(b).

This failure to report had no actual or potential safety or security consequences. However, a failure to make a required report to the NRC does have regulatory significance. Per Enforcement Policy Section 2.2.1(c) "Unless otherwise categorized in the violation examples contained in this Policy (i.e., Section 6.0), the severity level of a violation involving the failure to make a required report to the NRC will depend on the significance of and the circumstances surrounding the matter that should have been reported. … the Agency will normally cite a licensee for a failure to report a condition or event if the licensee knew of the

information to be reported and did not recognize that it was required to make a report."

Section 2.3.2 "Non-cited Violation," of the Enforcement Policy states, in part, "If a licensee ... has implemented a CAP that is determined to be adequate by the NRC, the NRC will normally disposition SL-IV violations... as non-cited violations (NCVs) if all the criteria in Paragraph 2.3.2.a. are met."

Enforcement:

Severity: Consistent with Section 6.0, "Violation Examples," of the NRC Enforcement Policy the violation aligned with the SL-IV violation Example 6.9(d)(5) in that it involved a licensee failure to make a report required by 10 CFR 70.50(c)(1)".

Violation: Contrary to the above requirements in 10 CFR 70.50, from July 21, 2021; to September 16, 2021, the licensee failed to notify the NRC of an event in which equipment failed to function as designed when, the equipment was required by regulation and licensee condition to mitigate the consequences of an accident, the equipment was required to be available and operable when it failed to function; and no redundant equipment was available and operable to perform the required safety function on and before the licensee's discovery of the condition.

This is a violation of 10 CFR 70.50(b); which is being documented as NCV 70-3103/2021003-01, "CAAS Inaudibility Not Reported," and is being opened and closed in this report.

Enforcement Action: This violation is being treated as an NCV, consistent with Section 2.3.2 of the Enforcement Policy.

EXIT MEETINGS AND DEBRIEFS

The inspectors verified no proprietary information was retained or documented in this report.

- On August 12, 2021, the inspectors presented the Fire Protection and Operational Safety inspection results to Karen Fili and other members of the licensee staff.
- On September 16, 2021, the inspectors presented the NCS, Transportation and the 2020 Environmental follow-up inspection results to Karen Fili and other members of the licensee staff.

DOCUMENTS REVIEWED

Inspection Procedure	Type	Designation	Description or Title	Rev. or Date
86740	Miscellaneous	UUSA QAPD	UUSA Quality Assurance Program Description	Rev. 42a
86740	Miscellaneous	UUSA SAR	UUSA Safety Analysis Report	Rev. 48
86740	Procedures	Guide	UUSA Maestro Training Reference Guide	2021
86740	Procedures	LO-3-1000-04	Cylinder Release for Use	Rev. 3
86740	Procedures	LO-3-2000-01	Receipt and Shipping of Cylinders	Rev. 24
86740	Procedures	LO-3-2000-01	External Cylinder Inspection	Rev. 19
86740	Procedures	LO-3-2000-03	On-Site Handling of UF6 Cylinders	Rev. 14
86740	Procedures	LO-3-3000-01	Transport Planning	Rev. 25
86740	Procedures	LO-4-2000-03	Inbound 30B and 48Y Release Desktop Guide	Rev. 9
86740	Procedures	RP-3-5000-01	Radioactive Material Shipment Surveys	
86740	Procedures	RW-3-1000-13	Shipping Radioactive and Mixed Waste	Rev. 15
86740	Procedures	TQ-3-0100-13	Training and Qualification Guidelines	Rev. 12
86740	Self-Assessments	2021-A-02-003	UUSA Audit 2021-A-02-003, Logistics and Transportation	04/09/2021
88015	Corrective Action Documents	EV109638, EV143495, EV145944, EV145989, EV147419, EV147490, EV147499, EV147641, EV147960	NCS Related Corrective Action Items	
88015	Corrective Action Documents Resulting from Inspection	EV148087, EV148104		
88015	Engineering Evaluations	ESR-2021-074	CAAS Inaudible TSB Rm 242	Rev. 0
88015	Engineering Evaluations	NCS-CSA-006	Criticality Safety Analysis of the Product Vent Pump and Chemical Trap Set	Rev. 10
88015	Engineering	NSR-2011-010	Blending & Sampling System	Rev. 0

	Evaluations			
88015	Engineering Evaluations	NSR-2015-043	Product Vent Pump and Chemical Trap Set (System 425) for AU1006	Rev. 0
88015	Engineering Evaluations	NSR-2015-043	Product Vent Pump and Trap Sets - Assay 1006	Rev. 0
88015	Engineering Evaluations	NSR-2020-002	Product Pumping and Tails Trains (System 422, Assay 1, System 432, Assay 1, Cascades 1 through 8) and Spare Trains	Rev. 4
88015	Engineering Evaluations	NSR-2020-02	SBM 1005 30B Stillage GEVS Piping Vents	Rev. 0
88015	Engineering Evaluations	NSR-291-007	Blending & Sampling System	Rev. 0
88015	Miscellaneous		INTEGRATED SAFETY ANALYSIS SUMMARY	Rev. 32b
88015	Miscellaneous		NCS Walkthrough Schedule	
88015	Miscellaneous	E-NCS-CP	NCS Criticality Engineer Demonstration of Continued Proficiency	Rev. 5
88015	Miscellaneous	E-NCS-CP_QN_2021	NCS Criticality Engineer Demonstration of Continued Proficiency	Completed 01/06/2021
88015	Miscellaneous	E-NCS-QG	Nuclear Criticality Safety (NCS) Engineer	Rev. 5
88015	Miscellaneous	EAP02	Emergency Action Plan for the Security Building	Rev. 7
88015	Miscellaneous	EAP05	Emergency Action Plan for the Cylinder Receipt and Dispatch Building	Rev. 7
88015	Miscellaneous	EAP08	Emergency Action Plan for the Technical Support Building (TSB)	Rev. 7
88015	Miscellaneous	GET-CBT	General Employee Training by Computer Based Training	
88015	Miscellaneous	NCSI-21-0013	SBM-1005 PSC	06/07/2021
88015	Miscellaneous	NCSI-21-0014	SBM-1005 UF6 Area	06/10/2021
88015	Miscellaneous	NCSI-21-0015	SBM-1003 PSC`	06/19/21
88015	Miscellaneous	NCSI-21-0017	CRDB GEVS Room	06/30/21
88015	Miscellaneous	NCSI-21-0019	Mass Spec Rooms 1001/1003/1005	07/14/2021
88015	Miscellaneous	NCSI-21-0020	Decontamination Workshop	07/23/2021
88015	Miscellaneous	NCSI-21-0022	TSB CAAS	08/06/2021
88015	Miscellaneous	NCSI-21-0023	HF monitors and DI solution storage areas in the CRDB and SBM1001/1003/1005 to exit anomalous condition	08/03/2021
88015	Miscellaneous	NCSI-21-0024	USM CAAS	08/19/2021

88015	Miscellaneous	NCSI-21-0026	Cascade Halls SBM-1003	08/25/2021
88015	Miscellaneous	NCSI-21-0021	LECTS Room	07/27/2021
88015	Miscellaneous	NCSI-21-0025	Cascade Halls SBM-1001/1001X	08/19/2021
88015	Miscellaneous	SBDV-2010-0029	Blending & Sampling Rig - Assays 1001 & 1002 - UF6 Handling Area	Rev. 1
88015	Miscellaneous	SBDV-2011-0094	Blending & Sampling System - Assays 1001 & 1002 - UF6 Handling Area	Rev. 0
88015	Miscellaneous	SBDV-2015-0031	Product Vent Pump and Trap Sets - Assay 1006	Rev. 0
88015	Miscellaneous	SBDV-2016-0009	AU1002 Process Gas Piping; UF6 Handling Area and Mass Spectrometer Room	Rev. 0
88015	Miscellaneous	SBDV-2019-0017	SBM-1005 30B Cylinder Stillage Utility Frames - GEVS Drops	Rev. 0
88015	Procedures	CR-3-1000-03	NCS Weekly Walkthroughs and Periodic Assessments	Rev. 16
88015	Procedures	EG-3-3200-03	Safe By Design Attribute Verification	Rev. 7
88015	Procedures	QA-3-3000-36	Operation of the Innov-X Systems Delta Series X-Ray Fluorescence Spectrometer	Rev. 4
88015	Procedures	RP-3-2000-04	Radiation and Contamination Surveys	Rev. 15
88015	Procedures	RP-3-4000-07	Portable Instruments	Rev. 11
88015	Procedures	TQ-3-0100-13	Training and Qualification Guidelines	Rev. 12
88015	Work Orders	WO 1000489860	SITE: CAAS Spurious Alarms	
88015	Work Orders	WO 1000505490	Site CAAS System: 0000-561 Discrepancies	07/22/2021
88020	Calculations	CALC-C-00179	Seismic Qualification of Support Structures for IROFS11, 12, and IROFS43	Rev. 0
88020	Calculations	CALC-K-00015	Automatic Trip of the Autoclave Heater & Fan on Autoclave High Internal Air Temperature (IROFS11)	Rev. 1
88020	Calculations	CALC-K-00016	Automatic Trip of the Autoclave Heater & Fan on High Internal Pressure (IROFS12)	Rev. 0
88020	Engineering Evaluations	51-9058919-005	Louisiana Energy Services (LES) National Enrichment Facility IROFS Failure Modes and Effects Analysis	Rev .5
88020	Engineering Evaluations	NEF-BD-11	Automatic Trip of the Autoclave Heater and Fan on Autoclave High Internal Air Temperature	Rev. 6
88020	Engineering Evaluations	NEF-BD-12	Automatic Trip of the Autoclave Heater and Fan on Autoclave High Internal Air Pressure (Pressure Transmitter)	Rev. 5
88020	Miscellaneous	EV 146038, 145904, 145835, 144688,	Various corrective action documents related to operational safety	08/12/2021

		144687, 143321, 143082, 140675		
88020	Miscellaneous	EV 147727, 147735, 147737, 147748, 140834,	EVs written as a result of the inspection	Various
88020	Procedures	MA-3-3400-01	IROFS1 Station Heater and Fan High Temperature Trip - RTD Surveillance	Rev. 12
88020	Procedures	MA-3-3400-11	IROFS11 Autoclave Heater and Fan High Temperature Trip - RTD Surveillance	Rev. 13
88020	Procedures	MA-3-3400-12	IROFS12 Autoclave Heater and Fan High Pressure Trip - Pressure Detector Surveillance	Rev. 13
88045	Miscellaneous	QAPD	UUSA Quality Assurance Program Description	Rev. 42a
88045	Miscellaneous	UUSA SAR	UUSA Safety Analysis Report	Rev. 48
88045	Procedures	EN-3-2020-01	EN Air Sampling	Rev. 7
88045	Procedures	EN-3-2020-02	EN Media Sampling	Rev. 8
88045	Procedures	EN-3-3030-01	I-Matic Operation and Maintenance	Rev. 4
88045	Procedures	Maestro Guide	UUSA Maestro Training Reference Guide	2021
88045	Procedures	TQ-3-0100-13	Training and Qualification Guidelines	Rev. 12
88045	Work Orders	WO 000449078	Alpha Monitor Cartridge Change	12/21/2020
88045	Work Orders	WO 1000466176	Alpha Monitor Cartridge Change	3/3/2021
88045	Work Orders	WO 1000466180	Alpha Monitor Cartridge Change	12/21/2020
88055	Corrective Action Documents	EV 120693, EV 123647, EV 127052, EV 137600, EV 140151, EV 140416, EV 140595, EV 140598, EV 140701, EV 140834, EV 140937, EV 141490, EV 142826, EV 142899, EV 143194, EV 143324 and ER-2013-2390	CAP items review during the Fire Protection inspection	Various
88055	Corrective Action Documents Resulting from	EV 147727, EV 147735, EV 147737, EV 147748, EV	CAP items resulting from the Fire Protection Inspection	Various

	Inspection	147765, EV 147790, EV 147791, EV 147792, and EV 147952		
88055	Drawings	LES-000-PID-691-001-01	Piping & Instrumentation Diagram Domestic Water (691), Potable Water (692), Process Water (693), and Fire Protection Water (694)	Rev. 4
88055	Engineering Changes	PMCR-2021-NEW-170	Requesting Quarterly (3M): Fire Brigade Truck & Trailer Vehicle Inspection	
88055	Engineering Evaluations	1039-SUB-0086	Fire Alarm System - Vesda Pipe and Fittings	01/21/2009
88055	Engineering Evaluations	NEF-BD-035	Fire-Rated Barriers	Rev. 20
88055	Engineering Evaluations	NEF-BD-36a	Limit Transient Combustible Loading in Uranic Areas	Rev. 18
88055	Fire Plans	FP-3-1000-05	Pre-Incident Plan Development and Control	Rev. 10
88055	Fire Plans	FP-3-1000-05	Pre-Incident Plan Development and Control	Rev. 11
88055	Fire Plans	FPE-REV-001	Fire Hazards Analysis for Urenco USA	Rev. 21
88055	Miscellaneous		Fire Protection Org Chart	06/24/2021
88055	Miscellaneous		Hot Work Training Completion Dates	08/12/2021
88055	Miscellaneous		Fire Brigade Qualified List	08/12/2021
88055	Miscellaneous		Memorandum of Understanding Between the City of Eunice Police, Fire, and Rescue Services and Urenco USA	06/15/2020
88055	Miscellaneous		Memorandum of Understanding Between City of Hobbs Fire Department and Urenco USA	06/15/2020
88055	Miscellaneous		Fire Drill Completion Dates	08/12/2021
88055	Miscellaneous	2021-HWP-052	1005 UF6 Area Brazing	05/14/2021
88055	Miscellaneous	2021-HWP-083		07/22
88055	Miscellaneous	GF001LP00100	Hot Work/Compensatory Fire Watch Initial Computer Based Training	Rev. 5
88055	Miscellaneous	GF001LP00I00	Hot Work/Compensatory Fire Watch Initial	Rev. 5
88055	Miscellaneous	MM263TPE05I00	Maintain IROFS 35 (Fire Damper)	Rev. 2
88055	Miscellaneous	OBSCIROFSQC00I00	UUSA Operator Basic, Item Relied On For Safety (IROFS) and Operating Requirements Manual (ORM)	Rev. 0
88055	Operability		Fire Impairment Tracking Log	08/12/2021

	Evaluations			
88055	Procedures	FP-1-1000-01	Fire Loss Prevention	Rev. 1
88055	Procedures	FP-2-1000-01	Fire Protection Program Requirements	Rev. 10
88055	Procedures	FP-3-1000-02	Flammable and Combustible Material Control	Rev. 15
88055	Procedures	FP-3-1000-03	Fire Prevention During Welding, Cutting, and Other Hot Work	Rev. 13
88055	Procedures	FP-3-1000-04	Fire System Impairments	Rev. 20
88055	Procedures	FP-3-1000-09	Plant Fire Brigade and Training	Rev. 4
88055	Procedures	FP-3-2000-03	IROFS35 Weekly Fire Door Inspection and IROFS35/36a/36d Combustibles Control Inspection – CRDB and ICC	Rev. 12
88055	Procedures	MA-3-2670-01	IROFS35 Fire Damper Inspections	Rev. 7
88055	Procedures	ORM 35	Fire-Rated Barriers	Rev. 9
88055	Procedures	ORM 36a	Administratively Limit Transient Combustible Load (SBM, ICC, and CRDB)	Rev. 11
88055	Procedures	TQ-3-0100-12-F-10	Training Approval Form for Incipient Fire Brigade Drill	Rev. 3
88055	Procedures	TQ-3-0100-12-F-10	Training Approval Form: Hot Work Fire Watch CBT	Rev. 2
88055	Self-Assessments	2020-A-09-015	Fire Protection NQA-1 Audit	Rev. 0
88055	Work Orders	WO 1000412880	1Y: FWPH Fire System Flow Test	05/27/2020
88055	Work Orders	WO 1000438903	3M: FWPH Fire System Inspect.	10/22/2020
88055	Work Orders	WO 1000438976	3M: Inventory Fire Brigade Trailer	
88055	Work Orders	WO 1000449359	1Y: FWPH Fire System Flow Tests	06/24/2021
88055	Work Orders	WO 1000465862	1W: ICC IROFS36A COMBUST CONT INSP	08/10/2021
88055	Work Orders	WO 1000466930	3M: Review Fire Impairments	
88055	Work Orders	WO 100465231	3M: Test SBM 5/6 Emergency Lights	05/23/21
88055	Work Orders	WO1000465232	3M: Test SBM 5/6 Emergency Lights	