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

April 29, 2022

Mr. Wyatt Padgett
Compliance and Licensing Manager
Louisiana Energy Services
dba Urenco USA (UUSA)
Urenco USA
P.O. Box 1789
Eunice, NM 88231

SUBJECT: URENCO USA – INTEGRATED INSPECTION REPORT 07003103/2022001

Dear Mr. Padgett:

On March 31, 2022, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection at Urenco USA 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.

One Severity Level IV violation is documented in this report. We are treating this violation as a non-cited violation (NCV) consistent with Section 2.3.2 of the Enforcement Policy.

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,

Signed by Williams, Robert
on 04/29/22

Robert E. Williams, Jr., Chief
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 07003103/2022001 DATED APRIL 29, 2022

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U.S. NUCLEAR REGULATORY COMMISSION
Inspection Report

Docket Number:	07003103
License Number:	SNM-2010
Report Number:	07003103/2022001
Enterprise Identifier:	I-2022-001-0084
Licensee:	Louisiana Energy Services dba Urenco USA (UUSA)
Facility:	Urenco USA
Location:	Eunice, NM
Inspection Dates:	March 21–March 24, 2022
Inspectors:	L. Cooke, Fuel Facility Inspector T. Sippel, Fuel Facility Inspector
Approved By:	Robert E. Williams, Jr., Chief 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, 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

Failure to make a required report	
Significance	Report Section
Severity Level IV NCV 07003103/2022001-01 Open/Closed	88020
The NRC inspectors identified a severity level (SL) IV NCV for a radiological spill in the liquid effluent collection and treatment system (LECTS) room that was not reported to the NRC in accordance with the requirements of 10 CFR 70.50.	

Additional Tracking Items

Type	Issue Number	Title	Report Section	Status
URI	07003103/2021002-01	Independence of the Radiation Protection Program	88020	Closed
WER	07003103/2021-002-00	Loss of High Radiation Audible Alarm (EN 55564)	88020	Closed
WER	07003103/2021-001-01	CAAS Alarm Inaudibility (EN 55480)	88020	Closed

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

IP 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 70.24, 70.61, 70.62, and Chapter 11, "Management Measures," of the facility's license application, 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/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 nuclear criticality safety, fire safety, and chemical safety based on the information provided in the integrated safety analysis (ISA) summary. The inspectors conducted a general plant tour of selected plant operating areas. The process areas and accident sequences selected for review are listed below:

- sequences with items relied on for safety (IROFS)58a/b: DS1-9, LW 1-6, SW 1-5, and VR 2-10 (IROFS are not currently being implemented)
- sequences with IROFS39 series: TC2-1, CHEM RELEASE-WORKER EVAC, CHEM RELEASE-WORKER EVAC – CAB, EE-SEISMIC-WORKER EVAC, FF-WORKER EVAC, etc.
- sequence with IROFS16e/f: CP1-3
- storage of safe-by-design drums and other components with 60 cm spacing

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

The inspectors reviewed information related to administrative 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 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:

- IROFS16e, administrative control to prevent criticality by controlling moderator
- IROFS39a, administrative control to prevent radiological and chemical exposure
- IROFS39b, administrative control to prevent radiological and chemical exposure
- IROFS39c, administrative control to prevent chemical exposure
- IROFS39d, administrative control to prevent radiological and chemical exposure
- IROFS58a, administrative control to prevent criticality by controlling mass (not currently being implemented)
- IROFS58b, administrative control to prevent criticality by controlling spacing (not currently being implemented)
- 60 cm spacing control, administrative control to prevent criticality

Implementation of Safety Controls (IP Section 02.03)

For the selected safety controls listed above, the inspectors reviewed selected management measures and interviewed licensee staff to verify proper implementation in accordance with 10 CFR 70 and applicable sections of the license application. 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:

- conducted walk-downs in portions of the cylinder receipt and dispatch building (CRDB), LECTS room, solid waste collection room, and separations building module (SBM) 1003 and 1004 to verify implementation of the 60 cm spacing safety control and IROFS58a/b (not currently implemented) and to observe performance of IROFS16e
- interviewed licensee staff and reviewed training material and portions of OP-3-2000-01, OP-3-2000-02, OP-3-2000-04, and OP-3-2000-06, for the implementation of IROFS39a/b/c/d
- reviewed portions of Attachment 1, "Connecting a Heeling Product Cylinder," of OP-3-0420-01 for the implementation of IROFS16e/f
- reviewed posting CRDB-16, which is an operator aid for implementing IROFS58a/b
- interviewed licensee engineering, radiological protection, and waste handling staff concerning the implementation of the licensee's 60 cm spacing control

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 license application. Additionally, the inspectors followed-up on WERs related to the criticality accident alarm system (CAAS) and compensatory measures, and an unresolved item (URI) related to the independence of the

licensee's radiation protection organization from the licensee's operations organization. Specifically, the inspectors conducted the following:

- reviewed work orders and procedures governing placement of criticality safety approved waste containers
- reviewed corrective action program (CAP) entries and related documents for a variety of operations and IROFS related CAP entries
- reviewed operations related self-assessments, including portions of: SA-2021-011, SA-2021-018, and 2021-A-12-016
- reviewed portions of TQ-5-0100-01, which contains training requirements for operations, decontamination and recycling, radiation protection and other licensee organizations
- interviewed various operators concerning the implementation of IROFS and the waste handling process
- reviewed program organizational changes, including GCP-007 as discussed in the closure of URI 2021-002-01
- observed plan of the day meetings and a shift turnover in the control room
- observed incipient fire brigade drill

INSPECTION RESULTS

<table>
<tr><td colspan="2">Failure to make a required report</td></tr>
<tr><td>Severity</td><td>Report Section</td></tr>
<tr><td>Severity Level IV
NCV 07003103/2022001-01
Open/Closed</td><td>88020</td></tr>
<tr><td colspan="2">The NRC inspectors identified a severity level (SL) IV NCV for a radiological spill in the LECTS room that was not reported to the NRC in accordance with the requirements of 10 CFR 70.50.</td></tr>
<tr><td colspan="2">Description: On February 28, 2022, licensee staff noticed that there was water on the floor of the LECTS room. The licensee determined that it was leaking from a slab tank berm into the adjacent non-radiologically controlled area floor. The condition was reported to the licensee's control room as a radiological spill, the area was roped off and posted, and personnel near the area completed personnel monitoring to verify that they had not been contaminated. However, for reportability purposes, the licensee treated the spill as water, based on a radiation survey of the spill area that found that the area radiation levels were typical of those caused only by background radiation. This was documented in their CAP as EV 149668.

During a walkdown on March 22, 2022, NRC inspectors observed that portions of the spill area were still roped off. The NRC inspectors interviewed licensee staff and reviewed radiation survey records and found that cleanup of the spill had continued for a week or more after discovery.

The licensee estimated the uranium concentration and enrichment of the spill from samples of the LECTS slab tank's contents. This was used with the estimated spill volume to determine that the total estimated activity of the spill was around 24 microcuries (µCi), which is greater than "five times the lowest annual limit on intake specified in Appendix B of §§ 20.1001-20.2401 of 10 CFR part 20" for uranium; which is 5 µCi.</td></tr>
</table>

Corrective Actions: The licensee entered the fact that the spill was not reported under 10 CFR 70.50(b)(1) into the CAP as EV 149975.

Corrective Action References: EV 149668, EV 149975.

Analysis: The regulation in 10 CFR 70.50(b)(1) requires, in part, that licensees "notify the NRC within 24 hours after the discovery of any of the following events involving licensed material: (1) An unplanned contamination event that: (i) Requires access to the contaminated area to be restricted for more than 24 hours by imposing additional radiological controls or by prohibiting entry into the area; [and] (ii) Involves a quantity of material greater than five times the lowest annual limit on intake specified in Appendix B of §§ 20.1001-20.2401 of 10 CFR part 20 for the material."

While the regulation in 10 CFR 70.50(c)(1) requires, in part, that licensees "shall make reports required by paragraphs (a) and (b) of this section ... to the NRC Operations Center."

In this instance, the spill into the non-radiologically controlled floor area in LECTS room was unplanned, the contaminated area was roped off for cleaning for more than 24 hours, and the estimated amount of material involved in the spill was greater than five times the lowest annual limit on intake for uranium. Because all the criteria in 10 CFR 70.50(b)(1) were met, a report should have been made to the NRC in accordance with 10 CFR 70.50.

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 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 that it involved a failure to make a report required by 10 CFR 70.50(c)(1).

Violation: Contrary to the above requirements in 10 CFR 70.50, following the February 28, 2022 spill, the licensee failed to notify the NRC within 24 hours of an unplanned contamination event that required access to the contaminated area to be restricted for more than 24 hours by imposing additional radiological controls, and involved a quantity of material greater than five times the lowest annual limit on intake for uranium.

This is a violation of 10 CFR 70.50; which is being documented as NCV 70-3103/2022001-01, "Failure to make a required report," and is being opened and closed in this report.

Enforcement Action: This violation is being treated as a non-cited violation, consistent with Section 2.3.2 of the Enforcement Policy.

WER (Discussed)	CAAS Alarm Inaudibility (EN 55480) WER 07003103/2021-001-01	88020

Description: During routine CAAS maintenance on July 20, 2021, licensee staff identified an area where the CAAS alarm was not clearly audible. The licensee stated that the alarm was functioning, but not at an adequate level of sound pressure to meet the acceptance criteria nor was it identified as being clearly audible to the licensee staff conducting the alarm test. The licensee established compensatory measures to provide an equivalent safety function within 24 hours by putting a mobile area radiation monitor (ARM) in the affected room. The affected room was in the Immediate Evacuation Zone (IEZ), but outside of the area in which licensed special nuclear material is handled, used, or stored. The licensee's failure to report this outage in accordance with 10 CFR 70.50(b)(2) was previously dispositioned as NCV 70-3103/2021-003-01 "CAAS inaudibility not reported" in NRC inspection report 2021-003 (ADAMS Accession Number: ML21302A040). Subsequently, the licensee reported the condition to the NRC on September 17, 2021, as Event Notification (EN) 55480.

The condition was entered into the licensee's CAP as EVs 148123 & 147490. Plant Modification MOD-21-0030 was initiated to resolve the audibility issues in the affected area. As part of the apparent cause evaluation of this event, an extent of condition was also performed. During this extent of condition review, the licensee discovered three additional historical examples of inaudible CAAS alarms that were not reported under 10 CFR 70.50(b)(2) as required. These conditions occurred on April 12th, 2014; August 15th, 2014; and August 20th, 2015; in which licensee test records indicated a CAAS outage, but no report was made. EN 55480 was amended on November 8, 2021, to document the three additional historical examples. Details of this extent of condition were documented in EV 148663.

The inspectors reviewed the licensee's apparent cause evaluation, related EVs, the licensee's initial 30-day report (ADAMS Accession Number: ML21292A106) dated October 15, 2021, and the licensee's amended 30-day report (ADAMS Accession Number: ML21341A553) dated December 31, 2021. Based on their review of the documentation, the inspectors concluded that the three historical CAAS outages were corrected by the licensee after they were discovered during testing.

In accordance with Section 3.3. of the Enforcement Policy, no additional violations are being issued for these non-compliances as they are further examples of the violation that was dispositioned as NCV 70-3103/2021-003-01.

Minor Violation	88020

Minor Violation: Following the discovery of the CAAS outage documented in EV 147490, the licensee put compensatory measures in place. The requirements for these compensatory measures were established as an Operations Workaround in EV 147490, which required that an Area Radiation Monitor (ARM) be placed in-the-area of the CAAS outage (Room 242), in order to comply with 10 CFR 70.24(a).

However, on November 5, 2021, a licensee operator conducting rounds observed that the ARM was not in place as required. The area was immediately evacuated, and the ARM was placed back in service in Room 242. The licensee found that the ARM was removed by members of the radiation protection group for calibration on October 26th and not

replaced. The radiation protection staff were unaware that the ARM was required to be in service as a compensatory measure. The licensee reported this event as EN 55564; which the NRC tracked as WER 07003103/2021-002-00 "Loss of High Radiation Audible Alarm (EN 55564)".

Following this event the licensee revised CALC-S-00150, Immediate Evacuation Zone Calculations at UUSA, with new more detailed calculations to show that Room 242 did not require CAAS evacuation alarms under 10 CFR 70.24(a). The inspectors reviewed the new boundary established in CALC-S-00150, reviewed a floor plan of the area, and walked down the area to verify that Room 242 was outside the new boundary.

Screening: The inspectors determined the violation was minor. The licensee's failure to follow the requirements of the Operations Workaround screened as a minor violation in accordance with Example 1.g of IMC 0616 Appendix B. Example 1.g states, in part, that a violation is minor if the failure did not adversely impact the safety function of the system. In this case, because the licensee's calculations later showed that the ARM was not required by 10 CFR 70.24(a) the failure did not adversely impact the safety function of providing evacuation alarms where required.

Enforcement: Following discovery of the missing ARM the licensee's immediate corrective actions were to evacuate the area and place the ARM back in service in Room 242. The licensee entered the event into the CAP as EV 148643, and performed an apparent cause evaluation which they documented in Apparent Cause Evaluation EV 148643, BCI UUSA Reporting Required - Compensatory ARM found missing, Revision (Rev.) 0. The licensee performed a stand down as a result of the issue and provided re-fresher training to staff on Operations Workarounds to ensure that licensee operations staff were aware of the requirements related to Operations Workarounds.

This failure to comply with 10 CFR 70.24 which requires clearly audible alarm signals if accidental criticality were to occur constitutes a minor violation that is not subject to enforcement action in accordance with the NRC’s Enforcement Policy. WER 07003103/2021-002-00 "Loss of High Radiation Audible Alarm (EN 55564)" is considered closed.

Minor Violation	88020

Minor Violation: URI 2021-002-01 was inspected during the operational safety inspection the week of March 21, 2022. The inspectors reviewed the general change package, licensing basis document change review, and differing professional opinion related to the organizational change. In addition, inspectors reviewed procedures regarding the radiation protection program, radiation safety committee, change management process, and maintenance of licensing basis documents, as well as an audit of the radiation protection program. The inspectors also interviewed licensee staff and management in the radiation protection program to verify that the radiation protection program maintained its independence from facility operations.

The licensee implemented an organizational change, reflected in the April 2021 organizational chart, consolidating the Radiation Protection organization with the Chemistry organization. This change was implemented without a general change package (GCP) and licensing basis document change review (LBDCR) being performed. NRC inspectors questioned the licensee on how this organizational change continued to meet the requirements in the SAR for maintaining the independence of the radiation protection

organization, and the licensee then developed a GCP and LBDCR to evaluate the organizational change after implementing the change. License Condition 30 requires that, prior to implementing a SAR change, a documented change request is completed which demonstrates that the SAR change meets the conditions for which prior NRC approval is not required.

Screening: The inspectors determined the violation was minor. This violation for failure to evaluate the change to the SAR prior to implementation screens as minor aligning with example 4e of IMC 0616 Appendix B, which states in part that the violation is minor if the subsequently completed evaluation determined that prior NRC approval of the change would not be required.

Enforcement: This failure to comply with License Condition 30 constitutes a minor violation that is not subject to enforcement action in accordance with the NRC's Enforcement Policy. The licensee has completed the required evaluations, and URI 2021-002-01 is considered closed.

EXIT MEETINGS AND DEBRIEFS

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

- On March 24, 2022, the inspectors presented the Operational Safety inspection results to Karen Fili, CEO, and other members of the licensee staff. The inspectors re-exited on April 26, 2022, with Wyatt Padgett and other members of the licensee staff.

DOCUMENTS REVIEWED

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
88020	Corrective Action Documents	Apparent Cause Evaluation for EV 148123	BCI UUSA Reporting Required 10CFR70.50(b)92) Report not Made for CAAS Deficiency	Rev. 0
		Apparent Cause Evaluation for EV 148643	BCI UUSA Reporting Required - Compensatory ARM Found missing	Rev. 0
		EV 147490, 147499, 147944, 147953, 147975, 148123, 148137, 148643, 148647, 148650, 148663, 148691, 148713, 148734, 148738, 148775, 148802, 149668	Operations related CAP entries	
	Drawings	NCS-1500-C-ARC-002-05-6	Dimensioned Second Floor Plan; but with NCS markup and comments dated Dec 18, 2021	Rev. 6
	Engineering Evaluation	CALC-S-00150	Immediate Evacuation Zone Calculations at UUSA	Rev. 1
		ISA-MEM-0056	Solid Waste System ISA Team Meeting Minutes	Rev. 2
		ISA-MEM-056	Solid Waste System ISA Team Meeting Minutes	Rev. 2
	Miscellaneous		Shift Turnover Form for 6AM Wednesday	03/23/2022
			IROFS39 training slide, Site Access Training	01/19/2022
			Turnover Form, Printed 5:56 AM Wednesday, March 23, 2022	
			Plan of the Day Meeting handout/summary	03/22/2022 to 03/24/2022
			Organizational Charts dated September 2020, April 2021, and February 2022	
			Chemistry and RP Manager Resume	
			2022 2Q Running List RWD	03/22/2022

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
			Calculation for potential airborne based on tank concentration for LECTs	04/01/2022
			Stand Down for EV 148643	
		CRDB-16	Criticality Safety Approved (CSA) - 3-Gallon (approximately 12-Liter) Drums - Involving Decontamination Activities	Rev. 3
		DPO-2021-001	Organizational Independence of the Radiation Protection Program	06/09/2021
		GCP-007	Organizational Change April 7, 2021	12/16/2021
		LBDCR 21-018	Licensing Basis Document Change Review for GCP-007	10/19/2021
	Procedures	AD-3-1000-05	Safety Review Committee	Rev. 16
		AD-3-1000-10	Change Management Process	Rev. 10
		CR-2-1000-01	Nuclear Criticality Safety Program Description	Rev. 10
		EG-3-3100-06	Integrated Safety Analysis Process	Rev. 19
		FP-3-1000-09	Fire Drill Report	Rev. 0
		LS-3-1000-05	Notifications and Event Reporting	Rev. 19
		LS-3-1000-06	Maintenance of License Basis Documents	Rev. 28
		OP-3-0420-01	Production System; Attachment 1: "Connecting a Heeled Product Cylinder"	Rev. 56
		OP-3-1000-01	Conduct of Operations	Rev. 37
		OP-3-2000-01	Hazardous Chemical Release	Rev. 19
		OP-3-2000-02	Fire Response	Rev. 18
		OP-3-2000-04	Earthquake Response	Rev. 18
		OP-3-2000-06	Severe Weather Response	Rev. 20
		RP-2-1000-01	Radiation Protection Program	Rev. 12
		RP-3-1000-04	Radiation Safety Committee	Rev. 0
		RW-3-1000-09	Radioactive Waste Container Setup, Handling and Disposition	Rev. 19
		TQ-4-0100-10	Recurring Training and Reporting Requirements	Rev. 3
		TQ-5-0100-01	Training Requirements Manual	Rev. 4
	Radiation Surveys		Weekly LECTS survey reports	03/04/2022, 03/11/2022, 03/17/2022, 03/22/2022

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
		Survey 22-0073	CRDB LECTS, Routine - Monthly	03/22/2022
	Self-Assessments	2021-A-12-016	Radiation Protection Program NQA-1 Audit	01/25/2022
		SA-2021-011	2021 Conduct of Operations Self-Assessment	Rev. 1
		SA-2021-018	201 Training Self-Assessment/training Effectiveness Review Assessment	Rev. 0
	Work Orders	1000422283	Monthly NDA Operations	03/15/2020
		1000438776	1W: Radiological Waste Collection	08/14/2020
		1000524871	CRDB: LECTS Room Leak Decon	11/30/2021