

# **DOCUMENTATION REQUEST**

## **EFFLUENT CONTROL & ENVIRONMENTAL PROTECTION INSPECTION OPERATIONAL SAFETY INSPECTION**

**SITE:** URENCO-USA (UUSA)

**INSPECTION REPORT NUMBER:** 2022-003

**INSPECTION DATES:** August 22-26, 2022

**NRC INSPECTORS:** Lead: Gregory Goff, [Gregory.Goff@nrc.gov](mailto:Gregory.Goff@nrc.gov)  
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**ACCOMPANYING PERSONNEL:**

None.

**IDENTIFIED LICENSEE CONTACTS:**

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**ASSOCIATED PROCEDURES:**

88020 – Operational Safety (OPS)  
88045 – Effluent Control and Environmental Protection (ENV)

**DOCUMENTATION REQUESTED**

**1. Effluent and Environmental Controls (88045) - G. Goff**

- a. Latest organizational chart of the ENV division (and their contact information if they can support the inspection).
- b. Procedures relating to calibration and set point verification for liquid and gaseous effluent monitors.
- c. Independent audits or assessments of the ENV program (most recent report) performed since last inspection.
- d. Audits/assessments of subcontracted laboratories/vendors used for processing samples.
- e. Sampling of calibration records for analytical equipment used for analysis of samples that provide data input to effluent releases.
- f. Provide a data stream sample used as input into the last available software calculations and a sample of software printouts that will allow confirmation of public exposure. Include a copy of any available manual backup calculations that was used to confirm the accuracy of the software program.

- g. List of corrective actions for last 12 months pertaining to findings from audits or assessments as well as from any environmental and effluent activities since the last inspection.
- h. Sampling of data sheets relating to daily functional checks/control charts for analytical equipment (if applicable).
- i. Most recent calibration package for stack monitors (rotameters/flowmeters) and/or liquid effluent monitors, as applicable.
- j. Maintenance history (past 12 months) for effluent monitoring equipment.
- k. Operational procedures, such as airborne and liquid effluent sample collection, sample analysis, and data collection/reporting.
- l. Procedures for changing out/maintaining stack filtration systems, waste water treatment systems, and environmental scrubbers.
- m. Documentation that describes and/or defines individual radiological exhaust/ventilation stacks and other gaseous discharge points; and the methods used for collecting samples and/or monitoring airborne radioactive emissions data, calibration of environmental sampling equipment.
- n. Procedures for adding vendors to approved supplier lists and for auditing those vendors; event reporting procedures (including what needs to be reported internally), etc.
- o. For new or changed procedures (since the last inspection), please also include the old procedure, or a markup showing the changes. The change package used to change the procedure, if any. And, include any training associated with the change.
- p. Documents transmitted to local, state, and federal for gaseous/air discharges via stacks, liquid discharges to the sewer, and storm water discharges.
- q. Groundwater sampling data produced within the last year.
- r. Specific air sampling items:
  - Documentation from assessing and/or reassessing flow rates from stacks. When were these calibrations performed?
  - Documentation that presents the actual calculations and their use to quantify and determine compliance with dose to the public.
  - Any occasional hand calculations performed to confirm automated calculations accuracy.
- s. The qualification and training records of any new management in environmental protection.
- t. The documentation for any changes to the environmental monitoring program since the last inspection such as environmental procedure changes.

- u. Documentation, including procedure(s), that shows compliance with 10 CFR 20.1406(c).

## **2. Operational Safety (88020) – L. Cooke and P. Startz**

Focus Area: 3LS1 (Startz) and SIT follow-up (Cooke)

- a. Operating procedures for Autoclave #3 (3LS1)
- b. Copies of latest completed maintenance, testing, and evaluations (MT&E) activities for all IROFS on 3LS1. These IROFS are limited to IROFS attached to the autoclave housing that prevent UF<sub>6</sub> escape in some manner, not GEVS.
- c. All accident sequences for the above IROFS
- d. A listing of all IROFS associated with 3LS1
- e. Supporting documentation for all aspects of UF<sub>6</sub> IROFS that prevent escape of UF<sub>6</sub> from Autoclave #3. Again, these IROFS are limited to IROFS attached to the autoclave housing that prevent UF<sub>6</sub> escape, not GEVS.
- f. Any audits/assessments, over the last 12 months, that involves IROFS on all autoclaves
- g. A simple listing of corrective actions, over the last 12 months, that includes all IROFS and management measures
- h. All autoclave P&ID drawings
- i. Documentation of autoclave compliance with ASME Code Case 2211-1 and ASME B31.3
- j. Code Case 185, as listed in the ISA
- k. Drawings and engineering analysis of the sampling system structure to prevent UF<sub>6</sub> cylinder movement within the autoclave
- l. Any documents generated or updated as part of the SIT follow-up analysis not already in the eRoom
- m. Process/Procedure for declaring IROFS inactive
- n. Listing of inactive IROFS

- o. ISA-IAD-0034 Attachment A:
- Deere Brochure for G-Series 6WD Motor Graders, 622G/GP / 672/GP / 772G/GP / 872G/GP
  - John Deere Brochure for K-Series Loaders, 644K/724K, 167–197 kW (224–264 net hp)
  - Dynapac FAYAT Group data on CC524HF Double Drum Vibratory Rollers
  - JCB Loadall, 512-56 data sheet.pdf
  - Stroke Facts\_cdc.gov.pdf
  - Heat Disease Fact\_cdc.gov.pdf
  - Emails from Project manager:
    - E-mail – Boden to Riedy, RE\_Request est. hrs use of John Deere grader and wheel loader for project, 3-18-2022
    - E-mail – Boden to Newell, RE\_Use of forklift, 4-12-2022
  - Excel spreadsheet for calculations of KIPS for 4 pieces of equipment
  - Probability of construction vehicle accidents associated with EV 149740
- p. Safety basis calculation/determination of probability of vehicle accidents with regards to IROFS50

**NOTEWORTHY:** Other documents may be requested subsequent to this documentation request.

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