



**Global Nuclear Fuel**

A Joint Venture of GE, Toshiba, & Hitachi

**Global Nuclear Fuel – Americas, LLC**  
Castle Hayne Road, Wilmington, NC 28401

August 31, 2007

U.S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, D.C. 20555-0001

Subject: 30-day Written Follow-Up Report of Event – Portion of DSR Process not  
Included in ISA

References: 1) NRC License SNM-1097, Docket 70-1113  
2) NRC Regulation 10CFR70.50

Dear Sir or Madam:

In accordance with 10CFR70.50(c)(2), the Global Nuclear Fuel – Americas L.L.C. (GNF-A) facility in Wilmington, North Carolina hereby submits a required written report for the July 31, 2007 determination that a portion of the Fuel Manufacturing Facility Dry Scrap Recycle (DSR) process was not included in the Integrated Safety Analysis (ISA). The determination was reported within 24 hours by telephone on August 1, 2007 by Mr. Scott Murray, Manager, Licensing and Liabilities to the NRC Operations Center in accordance with 10CFR70.50 Appendix A(b)(1).

The applicable information required by 10CFR70.50(c)(1) was submitted by facsimile on August 1, 2007 and is included as Attachment 1.

Additional information required by 10CFR70.50(c)(2) is provided as follows:

**Event Details and Safety Significance**

During a review of the fuel manufacturing operation (FMO) Integrated Safety Analysis, it was discovered that the container transfer station in the dry scrap recycle area had not been analyzed by the ISA team. As a result, equipment safety controls and necessary Items Relied on for Safety (IROFS) were not declared or documented in the ISA.

At no time did an unsafe condition exist. The existing criticality safety analysis of the operation bounded the situation, the controls were effective and were not challenged.

**Immediate Corrective Actions**

The affected equipment was shutdown until a revision of the ISA to document the process IROFS was complete.

**Probable Cause of Event**

The container transfer station equipment was installed in 1999. It was concluded that when the Dry Conversion Process area ISA was completed in 2003, the review team did not document the evaluation of this process equipment as required.

**Near-term Corrective Actions Taken**

1. A container transfer station ISA review was performed and process IROFS were identified.
2. A detailed review of authorized process equipment and controls was performed to ensure each has been evaluated in an ISA and the required IROFS have been identified. This review identified ten other processes with a valid criticality safety analysis that were not specifically documented as a part of an ISA evaluation and the required IROFS had not been identified. The ISA reviews for these processes have been completed and the required IROFS documented.

**Long-term (Preventative) Corrective Actions**

1. Complete additional reviews of authorized process equipment and controls as part of ongoing ISA updates and submit a revised ISA summary to NRC pursuant to 10CFR70.72. Due: January 30, 2008.

If additional information is needed regarding the event, please contact me on (910) 675-5950.

Sincerely,

***ORIGINAL SIGNATURE ON FILE***

S.P. Murray,  
Manager, Licensing and Liabilities COE

Attachment

cc: SPM 07-040  
Dr. W. Travers, Region II Administrator, Atlanta, GA  
M.N. Baker, HQ Washington, DC

U.S NRC Document Control Desk

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R. Gibson, Region II, Atlanta, GA

Attachment 1 – Event Notification Description

Dry Scrap Recycle Process not Included in ISA

During a review of the Fuel Manufacturing Operation (FMO) Integrated Safety Analysis (ISA), it was discovered that controls associated with the container transfer station in the Dry Scrap Recycle (DSR) area had not been included in the updated ISA Summary. Although process controls exist, they were not declared or documented in the ISA as IROFS. This report is submitted for administrative reporting pursuant to 10CFR70.50 Appendix A (b)(1). At no time did an unsafe condition exist. The existing criticality safety analysis of the operation bounded the situation, was effective, and was not challenged.

All affected equipment is shutdown pending revision of the ISA to document IROFS for this process.

While this did not result in an unsafe condition, this event is being reported pursuant with the reporting requirements of 10CFR70.50 Appendix A within 24 hours of discovery.

Scott Murray,  
Manager, Licensing and Liabilities COE  
11:30AM, 8/1/07