

November 6, 2009

MEMORANDUM TO: Joseph Shea, Director  
Division of Fuel Facility Inspection  
Region II

Dan Dorman, Director  
Division of Fuel Cycle Safety  
and Safeguards  
Office of Nuclear Material Safety  
and Safeguards

FROM: Patricia Silva, Chief /RA/  
Technical Support Branch  
Division of Fuel Cycle Safety  
and Safeguards  
Office of Nuclear Material Safety  
and Safeguards

SUBJECT: MEETING BETWEEN U.S. NUCLEAR REGULATORY COMMISSION,  
NUCLEAR ENERGY INSTITUTE AND FUEL CYCLE FACILITIES  
REPRESENTATIVES CONCERNING A REVISED FUEL CYCLE  
OVERSIGHT PROCESS

On October 6 and 7, 2009, the U.S. Nuclear Regulatory Commission (NRC) staff met with representatives of the Nuclear Energy Institute (NEI) and fuel cycle licensees and certificate holders concerning a proposed Revised Fuel Cycle Oversight Process (RFCOP). Enclosure 1 lists the meeting attendees.

#### Introduction

A public meeting notice for this meeting was issued on September 15, 2009, and was posted on the NRC's external (public) web page (NRC's Agencywide Document Access and Management Systems [ADAMS] accession number ML092530702). The notice included the meeting agenda, which was also available as a handout at the meeting. The purpose of the meeting was to discuss comments on the draft RFCOP documents issued on August 28, 2009 (ML092380069).

The RFCOP is an attempt to implement a risk-informed and performance-based approach to regulatory oversight of NRC-licensed fuel cycle facilities. The RFCOP seeks to build on the lessons learned from previous attempts to revise the process, from the development and implementation of the Reactor Oversight Process (ROP), and from the implementation of the

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revised Title 10 of the *Code of Federal Regulations* Part 70 which included the requirement that fuel cycle facilities prepare Integrated Safety Analyses (ISAs) to help risk inform NRC's oversight.

This meeting arranged to allow Industry to comment on documents that will implement the RFCOP. Specifically the following Inspection Manual Chapters (IMC), which were issued for comment August 28, 2009:

IMC-RFCOP-Basis Document;

IMC-RFCOP-Inspection Program;

IMC-RFCOP-SDP, Appendix B – Emergency Preparedness SDP;

IMC-RFCOP-SDP; and

IMC-RFCOP - Assessment Program.

A complete transcript of the meeting is available in ADAMS (ML092940202). A copy of the slides used by NRC is attached as Enclosure 2.

### **Discussion of Day One**

The first day of discussion concentrated on general comments on the overall process; the second day then focused on specific comments related to the individual documents. A complete transcript of both days of discussions is available in ADAMS (ML092940202).

Industry continues to express concern about their resources, their ability to keep pace with the NRC's aggressive schedule as well as the availability of all documents related to RFCOP. In support of their concerns Industry supplied a list (Enclosure 3) of current NRC initiatives and requested that NRC supply a suggested prioritization for their consideration. Action is being taken to prioritize a list of NRC/Industry initiatives that should provide the guidance that the industry is seeking.

Industry expressed concern that without the entire package of documents it was difficult to provide substantive comments on what were only pieces of a puzzle. Specifically, industry is struggling to understand the overall process. In part this was caused by the NRC staff not wanting to overwhelm the industry with too many documents at once. To achieve this goal the agency policy has been to introduce the industry to the RFCOP by providing the overarching documents first, e.g., IMC-RFCOP-Basis Document, with the implementation documents at a later date. Industry feels that this policy leaves too many gaps, and the entire document, with all the attachments and appendices, is needed for a proper review. NRC is considering revising its policy.

Industry expressed that the NRC should delay incorporation of safety culture components into the oversight process until the Commission approves a final safety culture policy statement. During the meeting, Industry stated that, given the NRC staff does not know what the Commission policy will be, it is premature for NRC staff to include safety culture in the oversight process. NRC staff discussed their plan for initially incorporating safety culture insights into the revised oversight plan. NRC staff noted that safety culture components have been part of the inspection program for many years to different degrees, although the term "safety culture" is not

used, and that there is no intent to change this. NRC staff also noted that during initial implementation of the revised oversight process, the NRC intends that safety culture considerations be part of Supplemental Inspections (done when licensee performance has degraded) and inspections of a licensee Problem Identification and Resolution (PI&R) program. The focus will be to assure that a licensee properly considered safety culture components when determining root and contributing causes and, during the PI&R inspection, whether a licensee has a health safety conscious work environment. NRC staff stated that the staff plans to incorporate cross-cutting issues and safety culture components more fully after the Commission issues a final safety culture policy statement. Industry reiterated their position that safety culture should not be part of the oversight process until after the Commission approves a final safety culture policy.

Industry's understanding of risk thresholds and risk comparisons (i.e., risk-informed scale) is a current barrier in their ability to make more substantive comments on the documents or the program. NRC is continuing to work to define the risk-informed scale for the RFCOP and this effort is scheduled for completion in January 2010.

Industry believes that Information Security should be removed as a cornerstone until a better understanding is developed. NRC tentatively agreed, however, we intend to continue internal discussion with other offices before we are prepared to make a final decision.

There was much discussion on the integration of the Enforcement Policy and the Assessment Program. Staff agreed that we have to increase our efforts to explain how the enforcement policy will change under the RFCOP. NRC found that the Industry did not have clear understanding of what "Traditional Enforcement" entailed. Specifically, industry did not understand that under the RFCOP the term Traditional Enforcement means, a Civil-Penalty will only be considered for a very select type of violation. Those select types consist of a violation that was found to be: 1) willful on the part of the perpetrator; 2) obstructed the NRC mission to protect public health and safety; or 3) resulted in actual consequences. To assist in the analysis of violations and enforcement the NRC has provided as Enclosure 4 a list of all violations that have been cited at fuel cycle facilities in the past 5 years.

Industry continues to struggle with our proposed definition of performance deficiency but agreed to hold further comment until after they have the opportunity to review the minor examples that are being developed for issuance with the next wave of documents. Lastly industry continued to express concern that the Action Matrix does not accurately reflect the fuel cycle industry and is still too heavily biased towards reactors. NRC did not agree however, staff is continuing to explore ways to clarify the documents.

## **Discussion of Day Two**

Day two discussion focused on the Industry comments on the documents that were released for review on August 28, 2009. All of these comments were captured within the transcript. Those comments not resolved during the meeting, will be catalogued for disposition prior to re-issuing these documents.

Path Forward

The NRC intends to issue the next round of documents at the end of October 2009 and will schedule a meeting as appropriate upon review of the industry comments.

Enclosure:

1. Meeting attendees list
2. Slides for NRC presentation
3. Industry List of NRC/Industry Initiatives
4. Consolidated list of violations at all fuel facilities

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Distribution w/ enclosures:

FCSS r/f	PMNS	R. Hannah, RII	J. Ledford, RII
M. Weber, NMSS	C. Haney, NMSS	M. Tschiltz, NMSS	D. Damon, NMSS
D. Morey, NMSS	J. DeJesus, NMSS	C. Marco, OGC	C. Carpenter, OE
M. Bailey, NMSS	F. Brown, NRR	W. Dean, NSIR	L. Reyes, RII
V. McCree, RII	C. Payne, RII	J. Henson, RII	D. Rich, RII
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ML093080261

OFFICE	TSB	TSB	RII	TSB
NAME	PJenifer	MRaddatz	SVias	PSilva
DATE	11/4/09	11/06/09	11/06/09	11/06/09

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List of meeting attendees

October 6, 2009

Name	Title	Affiliation
Lance J. Rakovan,		Facilitator, NRC/Office
Janet P. Kotra		Facilitator, NRC/Office
Marissa Bailey,		NRC/NMSS
Rudolph Bernhard,		NRC/Region II
Michael Boren,		USEC, Inc
Cynthia Carpenter,		NRC/Office of Enforcement
Barry Cole		Babcock & Wilcox Nuclear Operations Group
Douglas Collins,		NRC/RII
Gerard Couture		Westinghouse (via telephone)
Dennis Damon,		NRC/NMSS
Bill Dean,		NRC/Office of Nuclear Security Incident Response (NSIR)
Jose Diaz,		NRC/RII (via telephone)
Jonathan Dejesus,		NRC/NMSS
Jennifer E. Foster		NRC/RII (via telephone)
Sean Fuller		GNF Americas
Russell A. Gibbs,		NRC/Office of Nuclear Reactor Regulation (NRR)
Alphonsa Gooden		NRC/RII
Larry Harris		NRC/NSIR
Felix M. Killar		Nuclear Energy Institute (NEI)
Robert Link		AREVA NP
Calvin Manning		AREVA NP
Dennis Morey		NRC/NMSS
Scott Murray		GE Hitachi
Larry V. Parscale		Honeywell Metropolis Conversion
Michael Raddatz		NRC/NMSS
Daniel Rich		NRC/RII
Randy Schackelford		Nuclear Fuel Services (NFS)
Janet Schlueter		NEI
Joseph Shea		NRC/RII
Patricia Silva		NRC/NMSS
Joseph Smetanka		Westinghouse (via telephone)
Michael Tschiltz		NRC/NMSS
Charles Vaughan		NEI
Michael Weber		NRC/NMSS
Jennifer Wheeler		NFS
Steven Vias		NRC/RII
Douglas Yates		Shaw AREVA MOX Services

List of meeting attendees

October 7, 2009

Name	Title	Affiliation
LANCE J. RAKOVAN,		Facilitator, NRC/Office of the EDO
MARISSA BAILEY		NRC/NMSS
RUDOLPH BERNHARD		NRC/Region II (RII)
MICHAEL BOREN		USEC
BARRY COLE		Babcock & Wilcox Nuclear Operations Group
DOUGLAS COLLINS		NRC/RII
GERARD COUTURE		Westinghouse (via telephone)
DENNIS DAMON		NRC/NMSS
RUDOLPH BERNHARD		NRC/Region II (RII)
MICHAEL BOREN		USEC
BARRY COLE		Babcock & Wilcox Nuclear Operations Group
DOUGLAS COLLINS		NRC/RII
GERARD COUTURE		Westinghouse (via telephone)
DENNIS DAMON		NRC/NMSS
RUDOLPH BERNHARD		NRC/Region II (RII)
MICHAEL BOREN		USEC
BARRY COLE		Babcock & Wilcox Nuclear Operations Group
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GERARD COUTURE		Westinghouse (via telephone)
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JONATHAN DeJESUS		NRC/NMSS
JENNIFER E. FOSTER		NRC/RII (via telephone)
SEAN FULLER		GNF Americas
RUSSELL A. GIBBS		NRC/Office of Nuclear Reactor Regulation (NRR)
ALPHONSA GOODEN		NRC/RII
ALPHONSA GOODEN		NRC/RII
LARRY HARRIS		NRC/NSIR
ROBERT LINK		AREVA NP
CALVIN MANNING		AREVA NP
DENNIS MOREY		NRC/NMSS
SCOTT MURRAY		GE Hitachi
LARRY V. PARSCALE		Honeywell Metropolis Conversion
MICHAEL RADDATZ		NRC/NMSS
DANIEL RICH		NRC/RII
JANET SCHLUETER		NEI
JOSEPH SHEA		NRC/RII
PATRICIA SILVA		NRC/NMSS
JOSEPH SMETANKA		Westinghouse (via telephone)
CHARLES VAUGHAN		NEI
MICHAEL WEBER		NRC/NMSS
JENNIFER WHEELER		NFS
RANDY WOODS		STEVEN VIAS, NRC/RII (via telephone)
DOUGLAS YATES		AREVA MOX Services
RANDY WOODS		(via telephone)
STEVEN VIAS		NRC/RII

**List of cited violations at fuel cycle facilities in the past 5 years**

ITEM_ID	ITEM_TITLE	SITE ABBREV	CORNERSTO NE	ITEM TYPE CD	ITEM STATUS CD	OFFICE CD	ITEM ISSUE DT	ITEM CLOSE DT	EA CASE NO
<a href="#">07000027/2004201-01</a>	Failure to control introduction of a greater than 2.5-liter cardboard box into the Uranium Recovery facility	BWXT	CRIT	VIO	C	L	03/03/04	03/03/04	
<a href="#">07000027/2005001-01</a>	Failure to Comply with Procedure Requirements for SNM Storage.	BWXT	CRIT	VIO	C	V	02/09/05	02/09/05	
<a href="#">07000027/2005003-01</a>	Repetitive Failure to Control Unfavorable Geometry Containers in Uranium Recovery	BWXT	CRIT	VIO	C	V	05/02/05	05/02/05	
<a href="#">07000027/2005003-02</a>	Failure to Conduct Activities Involving Licensed Materials in Accordance with Procedural Requirements Which Resulted in an Inadequate Facility Change Review	BWXT	CRIT	VIO	C	V	05/02/05	05/02/05	
<a href="#">07000027/2005203-01</a>	Failure to document the identification and minimization of criticality risk in the criticality safety analyses for ventilation systems other than in the uranium recovery area.	BWXT	CRIT	VIO	C	L	08/02/05	08/02/05	
<a href="#">07000027/2006004-01</a>	Inadequate maintenance rendered an Item Relied On For Safety out of service	BWXT	CRIT	NCV	C	V	06/20/06	06/20/06	
<a href="#">07000027/2006202-02</a>	Failure to apply a nuclear criticality safety posting or procedurally control a cart being used as a storage location for fissile material	BWXT	CRIT	VIO	C	L	04/06/06	04/06/06	
<a href="#">07000027/2006204-02</a>	Failure to conduct operations according to administrative limits (e.g., type of material) outlined in the nuclear criticality safety posting.	BWXT	CRIT	VIO	C	L	08/11/06	08/11/06	
<a href="#">07000027/2007001-01</a>	Failure to Maintain Container Control Area Entry Requirements	BWXT	CRIT	VIO	C	V	03/22/07	01/25/08	
<a href="#">07000027/2007001-02</a>	Failure to Maintain SNM Mass Log	BWXT	CRIT	VIO	C	V	03/22/07	06/08/07	
<a href="#">07000027/2007002-01</a>	Failure To Evaluate Facility Change Affecting IROFS	BWXT	CRIT	VIO	C	V	05/07/07	11/30/07	
<a href="#">07000027/2007002-02</a>	Failure To Follow NCS QA Procedure	BWXT	CRIT	VIO	C	V	05/07/07	11/30/07	
<a href="#">07000027/2007002-03</a>	Failure To Establish IROFS	BWXT	CRIT	VIO	C	V	05/07/07	11/30/07	
<a href="#">07000027/2007003-01</a>	Failure to follow procedure resulted in an SNM bearing	BWXT	CRIT	NCV	C	V	06/08/07	06/08/07	

<a href="#"><u>07000027/2007004-01</u></a>	Solution Transfer without implementing the required IROFS Failure to Implement the Proper Change Management Process for a Modification to an IROFS	BWXT	CRIT	NCV	C	V	07/30/07	07/30/07
<a href="#"><u>07000027/2007004-02</u></a>	Failure to Immediately Notify Safety Management Following a Test Failure of an IROFS	BWXT	CRIT	VIO	C	V	07/30/07	11/30/07
<a href="#"><u>07000027/2007006-01</u></a>	Failure to Perform an NCS Analysis to Safely Control the Transport of HEU Solution-filled Raschig Ring Vacuum Cleaners	BWXT	CRIT	VIO	C	V	10/19/07	01/28/09
<a href="#"><u>07000027/2007006-02</u></a>	Failure to Establish IROFS for a Ventilation Enclosure Pre-Filter.	BWXT	CRIT	NCV	C	V	10/19/07	10/19/07
<a href="#"><u>07000027/2007006-03</u></a>	Failure to Notify NRC Within the Required Time of an Event Involving a Loss of IROFS	BWXT	CRIT	VIO	C	V	10/19/07	01/25/08
<a href="#"><u>07000027/2007205-01</u></a>	Failure to conduct operations according to administrative limits (e.g., quantity of containers and moderating materials) outlined in the nuclear criticality safety posting	BWXT	CRIT	VIO	C	L	11/14/07	11/14/07
<a href="#"><u>07000027/2008202-02</u></a>	Failure to demonstrate the required subcritical margin for an explicitly modeled upset condition.	BWXT	CRIT	NCV	C	L	04/11/08	04/11/08
<a href="#"><u>07000027/2008202-03</u></a>	APV-Failure to comply with fill and check procedures for RRVC's.	BWXT	CRIT	VIO	C	L	04/11/08	04/11/08
<a href="#"><u>07000027/2008202-05</u></a>	APV-Failure to establish double contingency for RRVCs.	BWXT	CRIT	VIO	C	L	04/11/08	04/11/08
<a href="#"><u>07000027/2008202-06</u></a>	APV-Failure to comply with ANSI/ANS 8.5 during operation of RRVCs.	BWXT	CRIT	VIO	C	L	04/11/08	04/11/08
<a href="#"><u>07000027/2008205-02</u></a>	Failure to conduct operations according to administrative limits (e.g., spacing of fuel) established by NCS and provided on an NCS posting.	BWXT	CRIT	VIO	C	L	11/05/08	11/05/08
<a href="#"><u>07001113/2005202-02</u></a>	Licensee's failure to maintain a required moderation control.	GNFA	CRIT	VIO	C	L	07/22/05	07/22/05
<a href="#"><u>07001113/2006002-02</u></a>	Violation of criticality safety limit in Bundle Assembly	GNFA	CRIT	NCV	C	V	04/13/06	04/13/06
<a href="#"><u>07001113/2006002-03</u></a>	Failure to incorporate a criticality safety control into procedures	GNFA	CRIT	NCV	C	V	04/13/06	04/13/06

<a href="#">07001113/2006201-02</a>	Failure to properly implement a credited safety control requiring 60 days aging of waste boxes prior to uranium content verification by E-gun scan	GNFA	CRIT	VIO	C	L	02/24/06	02/24/06	
<a href="#">07001113/2006201-03</a>	Failure to post a properly issued and approved NSR/R	GNFA	CRIT	VIO	C	L	02/24/06	02/24/06	
<a href="#">07001113/2006202-01</a>	Concerns the failure to perform adequate maintenance on exterior criticality alarm horns.	GNFA	CRIT	VIO	C	L	09/21/06	09/21/06	
<a href="#">07001113/2006202-02</a>	Concerns the failure to maintain criticality alarm horn audibility in the DCP area.	GNFA	CRIT	VIO	C	L	09/21/06	09/21/06	
<a href="#">07001113/2007005-01</a>	Failure to get Configuration Management Center review and approval to install a redundant wire and change the logic code.	GNFA	CRIT	NCV	C	V	01/11/08	01/11/08	
<a href="#">07001113/2007203-01</a>	Failure to demonstrate that the gadolinium slugger press was critically safe in all cases.	GNFA	CRIT	NCV	C	L	10/12/07	10/12/07	
<a href="#">07001113/2007203-02</a>	Failure to verify the composition or periodically verify the integrity of PVC pipe in gadolinia slugger press.	GNFA	CRIT	VIO	C	L	10/12/07	10/12/07	
<a href="#">07001113/2007203-03</a>	Failure to ensure that criticality controls in the new revision of the ISA were current and properly documented.	GNFA	CRIT	VIO	C	L	10/12/07	10/12/07	
<a href="#">07001113/2008004-01</a>	The failure to maintain double contingency during a maintenance activity on the DCP L2-A hatch valves	GNFA	CRIT	VIO	C	V	08/13/08	04/24/09	2008123
<a href="#">07001113/2008004-02</a>	The failure to establish an adequate criticality safety program in that GNF-A conducted DCP Line-2 maintenance activities, involving the handling of enriched uranium, that were not assessed for normal	GNFA	CRIT	VIO	C	V	08/13/08	04/24/09	2008123
<a href="#">07001113/2008004-03</a>	The failure to conduct licensed material processing in accordance with properly issued and approved practices and procedures, as required by Safety Condition No. S-1 of the license and Section 3.9.	GNFA	CRIT	VIO	C	V	08/13/08	04/24/09	2008123
07001201/2004203-02	Failure to conspicuously post dedicated criticality	LYNC	CRIT	VIO	C	L	06/15/04	06/15/04	

<a href="#"><u>07000143/2004201-01</u></a>	safety controls Failure to control six greater-than-3.3-liter plastic bags in the 800 Area	NFS	CRIT	VIO	C	L	3/11/04	03/11/04
<a href="#"><u>07000143/2004206-01</u></a>	Failure to comply with the fissile material handling requirements of 55T-04-0033 and the Station Limits card requirements	NFS	CRIT	VIO	C	L	12/9/04	12/09/04
<a href="#"><u>07000143/2004207-01</u></a>	The licensee's failure to comply with the unfavorable geometry bag handling requirements of NFS-HS-CL-27	NFS	CRIT	VIO	C	L	2/11/05	02/11/05
<a href="#"><u>07000143/2004207-02</u></a>	Failure to get NCS approval prior to storing 1-liter containers	NFS	CRIT	NCV	C	L	2/11/05	02/11/05
<a href="#"><u>07000143/2004207-05</u></a>	Licensee's failure to ensure that k-effective values for credible abnormal conditions did not exceed the 0.95 limit	NFS	CRIT	VIO	C	L	2/11/05	02/11/05
<a href="#"><u>07000143/2004207-06</u></a>	Licensee's failure to demonstrate that the concentration was less than 0.05 g U235/l	NFS	CRIT	VIO	C	L	2/11/05	02/11/05
<a href="#"><u>07000143/2005008-01</u></a>	Failure to maintain configuration control.	NFS	CRIT	VIO	C	V	10/31/05	10/31/05
<a href="#"><u>07000143/2005010-02</u></a>	Failure to maintain operators stationed with operating processes.	NFS	CRIT	NCV	C	V	12/15/05	12/15/05
<a href="#"><u>07000143/2005010-03</u></a>	Failure to comply with criticality safety postings.	NFS	CRIT	NCV	C	V	12/15/05	12/15/05
<a href="#"><u>07000143/2005010-04</u></a>	Criticality Station Limit Violation	NFS	CRIT	NCV	C	V	12/15/05	12/15/05
<a href="#"><u>07000143/2005203-01</u></a>	Failure to establish double contingency for the backflow of solution into the hydrogen dilution process ventilation system.	NFS	CRIT	VIO	C	L	6/2/05	06/02/05
<a href="#"><u>07000143/2005205-05</u></a>	Failure to prohibit use of positive bias in calculating USL values for HEU operations	NFS	CRIT	VIO	C	L	9/9/05	09/09/05
<a href="#"><u>07000143/2005208-01</u></a>	Failure to discuss the actual safety limit relied on in wastewater treatment tanks to demonstrate subcriticality for normal and credible abnormal conditions	NFS	CRIT	VIO	C	L	1/5/06	01/05/06
<a href="#"><u>07000143/2005208-03</u></a>	Failure to establish an appropriate concentration safety limit for non-uniform aqueous solution in WWTF tanks	NFS	CRIT	VIO	C	L	1/5/06	01/05/06
<a href="#"><u>07000143/2006001-01</u></a>	Failure to post nuclear criticality safety instructions.	NFS	CRIT	NCV	C	V	3/6/06	03/06/06
<a href="#"><u>07000143/2006001-02</u></a>	Failure to correctly adjust	NFS	CRIT	NCV	C	V	3/6/06	03/06/06

	the alarm setpoint of an in-line monitor.									
<a href="#">07000143/2006003-01</a>	Violation of criticality safety requirements	NFS	CRIT	VIO	C	V	5/23/06	05/23/06	2006000	
<a href="#">07000143/2006205-01</a>	Failure to have two criticality accident alarm detectors over the WWTF	NFS	CRIT	VIO	C	L	7/21/06	07/21/06		
07000143/2007003-01	Failure to implement NFS safety procedures during 306 diesel generator/UPS/ABT maintenance activities	NFS	CRIT	VIO	C	V	6/4/07	10/30/08		
<a href="#">07000143/2007004-01</a>	Failure to Comply with Operations Procedures	NFS	CRIT	NCV	C	V	7/16/07	07/16/07		
<a href="#">07000143/2007006-03</a>	Inadequate review/approval for a procedure change	NFS	CRIT	VIO	O	V	10/8/07			
<a href="#">07000143/2007008-02</a>	Inadvertent Criticality Alarm	NFS	CRIT	VIO	C	V	12/28/07	05/05/08		
<a href="#">07000143/2007009-01</a>	Failure to Follow Plant Procedures	NFS	CRIT	NCV	C	V	1/28/08	01/28/08		
<a href="#">07000143/2007009-03</a>	Failure to Implement the Tollgate Process for the BPF U-Metal Project	NFS	CRIT	VIO	O	V	1/28/08			
<a href="#">07000143/2007208-01</a>	Failure to have NCS approval in an SOP, LOA, or other formal method for flexible lines that were located in the OCB as required by procedure.	NFS	CRIT	VIO	C	L	11/14/07	11/14/07		
<a href="#">07000143/2008001-01</a>	Failure to adequately maintain BPF downblending In-line Monitor	NFS	CRIT	NCV	C	V	5/5/08	05/05/08		
<a href="#">07000143/2008001-02</a>	Failure to perform SRE testing in accordance with plant procedures	NFS	CRIT	VIO	C	V	5/5/08	10/30/08		
<a href="#">07000143/2008003-01</a>	Failure to Follow a Stop Movement Order	NFS	CRIT	NCV	C	V	10/30/08	10/30/08		
<a href="#">07000143/2008004-01</a>	Failure to adhere to plant procedures	NFS	CRIT	VIO	O	V	2/3/09			
<a href="#">07000143/2008202-01</a>	Failure to demonstrate the adequacy of subcritical margin under normal conditions	NFS	CRIT	VIO	C	L	4/24/08	04/24/08		
<a href="#">07000143/2008202-02</a>	Failure to survey filter media prior to packaging for disposal	NFS	CRIT	NCV	C	L	4/24/08	04/24/08		
07007001/2004201-01	Failure to post a fissile operation with the applicable NCS requirements sign.	PAD	CRIT	VIO	C	L	04/29/04	04/29/04		
07007001/2004203-02	Failure to establish or maintain double contingency for the accident scenario of RCW	PAD	CRIT	VIO	C	L	10/15/04	10/15/04		

<a href="#"><u>07007001/2005001-04</u></a>	Failure to maintain double contingency principle in the elevator pit	PAD	CRIT	NCV	C	V	02/18/05	02/18/05
<a href="#"><u>07007001/2005009-01</u></a>	Non-cited TSR violations	PAD	CRIT	NCV	C	V	01/24/06	01/24/06
<a href="#"><u>07007001/2006203-01</u></a>	Failure to maintain the safe geometry limit in the C-310 scale pit of 3.68 inches.	PAD	CRIT	VIO	C	L	10/27/06	10/27/06
<a href="#"><u>07007001/2008201-02</u></a>	Tracks the certificee's failure to document its justification for using less than optimal reflective conditions in NCSE-118 for chemical trap operations	PAD	CRIT	VIO	C	L	03/21/08	03/21/08
07001257/2004202-01	Failure to update the CSS for the U3O8 area to clearly identify the correct source CSA	RICH	CRIT	VIO	C	L	05/19/04	05/19/04
07001257/2004203-01	Failure to restrict an unfavorable geometry container from under fissile solution lines.	RICH	CRIT	VIO	C	L	12/22/04	12/22/04
<a href="#"><u>07001257/2005001-02</u></a>	Failure to maintain Configuration controls	RICH	CRIT	NCV	C	V	04/01/05	04/01/05
<a href="#"><u>07001257/2005203-01</u></a>	Failure to designate appropriate IFORS for the accident sequence of inadvertently introducing dry hydrogenous additives into 55-gal drums in the BLEU warehouse storage array (Section 2.0)	RICH	CRIT	VIO	C	L	12/20/05	12/20/05
<a href="#"><u>07001257/2008202-01</u></a>	Failure to provide adequate written procedures to prevent employees from working independently at work stations after failing to complete annual requalification training.	RICH	CRIT	VIO	C	L	07/16/08	07/16/08
<a href="#"><u>07001257/2009201-01</u></a>	Tracks the failure to implement moderator controls on spillable liquids to ensure that $k_{eff}$ does not exceed 0.97 for large quantities of uranium oxide powder.	RICH	CRIT	VIO	O	L	05/13/09	
07001151/2003203-01	Failure to comply with the criticality control parameters and instructions posted on four uranium storage racks	WEST	CRIT	VIO	C	L	01/02/04	01/02/04
<a href="#"><u>07001151/2004001-01</u></a>	Failed to control the uranium concentration in the incinerator system	WEST	CRIT	VIO	C	V	05/13/04	05/13/04
<a href="#"><u>07001151/2004004-01</u></a>	Failure to follow a procedure that resulted in the transfer of an unanalyzed uranyl	WEST	CRIT	VIO	C	V	09/24/04	09/24/04

		nitrate solution								
<a href="#">07001151/2004202-01</a>	Failure to comply w/posted NCS requirements regarding IFBA rod stack height, mop bucket liquid contents, a mop bucket collecting process liquids, mop bucket placed within 12" of process piping.	WEST	CRIT	VIO	C	L	10/29/04	10/29/04		
07001151/2004202-04	Failure to identify specific limits and controls in place for fissile material operations in a CSA.	WEST	CRIT	VIO	C	L	10/29/04	10/29/04		
07001151/2004202-06	Failure to control the introduction of an NFG container into a restricted area.	WEST	CRIT	NCV	C	L	10/29/04	10/29/04		
07001151/2004202-09	Failure to control the uranium concentration in the incinerator system within the subcritical limit.	WEST	CRIT	VIO	C	L	10/29/04	10/29/04		
07001151/2004202-10	Failure to regularly perform radiological survey of the incinerator crossover pipe.	WEST	CRIT	VIO	C	L	10/29/04	10/29/04		
07001151/2004202-11	Failure to incorporate sufficient margins of safety to require at least 2 unlikely, independent and concurrent changes in process conditions in the incinerator system before a criticality accident	WEST	CRIT	VIO	C	L	10/29/04	10/29/04		
07001151/2004202-12	Failure to establish controls to maintain concentration to ensure that incinerator ash was less than the minimum infinite critical concentration for mass in incinerator off-gas system	WEST	CRIT	VIO	C	L	10/29/04	10/29/04		
07001151/2004202-13	Failure to establish controls to maintain concentration to ensure that incinerator ash was less than the minimum infinite critical concentration for mass in the incinerator ash handling system	WEST	CRIT	VIO	C	L	10/29/04	10/29/04		
07001151/2004202-14	Failure to communicate the bounding assumption that uranium concentration was limited to minimum infinite critical concentration	WEST	CRIT	VIO	C	L	10/29/04	10/29/04		

07001151/2004202-15	Failure to confirm the conclusion in the incinerator ash handling CSE that ash in low-level radioactive waste incineration process does not exceed 15 wt% uranium.	WEST	CRIT	VIO	C	L	10/29/04	10/29/04
07001151/2004202-16	Failure to identify that less than previously documented double contingency protection remains in place to prevent failure to notify the NRC during NCS review of a 1998 event.	WEST	CRIT	VIO	C	L	10/29/04	10/29/04
<a href="#"><u>07001151/2005004-01</u></a>	Failure to establish double contingency protection for a Ventilation System	WEST	CRIT	VIO	C	V	07/15/05	07/15/05
<a href="#"><u>07001151/2005201-03</u></a>	Failure to correctly incorporate calculational bias into results calculated from explicit models	WEST	CRIT	VIO	C	L	03/15/05	03/15/05
<a href="#"><u>07001151/2005201-10</u></a>	Failure to establish double contingency protection for the nitrogen accumulator tanks.	WEST	CRIT	VIO	C	L	03/15/05	03/15/05
<a href="#"><u>07001151/2005202-01</u></a>	Concerned the failure to maintain the IFBA transport caskets in a horizontal array.	WEST	CRIT	NCV	C	L	10/06/05	10/06/05
07001151/2006201-02	Failure to limit fissile material to 1000 grams in the helium pressure chamber area (Section 3.0)	WEST	CRIT	NCV	C	L	01/30/06	01/30/06
<a href="#"><u>07001151/2006203-02</u></a>	Failure to provide complete criticality alarm coverage of the UF6 cylinder storage pad.	WEST	CRIT	NCV	C	L	09/21/06	09/21/06
<a href="#"><u>07001151/2007201-01</u></a>	Failure to implement a replacement component in accordance with the approved configuration management procedure.	WEST	CRIT	VIO	C	L	05/03/07	05/03/07
<a href="#"><u>07001151/2007202-02</u></a>	Failure to comply with posted limit on moderating materials in a storage array.	WEST	CRIT	VIO	C	L	08/29/07	08/29/07
07001151/2007203-01	Failure to ensure personnel applying seals were trained in the application and removal of seals.	WEST	CRIT	VIO	C	L	12/20/07	12/20/07
<a href="#"><u>07001151/2007204-01</u></a>	Failure to comply with the chemical development laboratory mass limit.	WEST	CRIT	NCV	C	L	01/14/08	01/14/08
07001151/2008201-01	Failure of licensee to correctly apply criteria from ISA Handbook for classifying events as incredible when relying on facility SSCs	WEST	CRIT	VIO	W	L	06/06/08	

<a href="#"><u>07001151/2008202-01</u></a>	The failure to provide adequate written procedures to ensure that Raschig rings are used and inspected in accordance with ANS/ANSI 8.5	WEST	CRIT	VIO	C	L	08/14/08	08/14/08
<a href="#"><u>07001151/2008204-01</u></a>	Repeated occurrences of licensee failure to carry out instructions in procedure RA-314 during implementation of CSEs.	WEST	CRIT	VIO	C	L	12/03/08	12/03/08
<a href="#"><u>07001151/2009201-01</u></a>	Failure of licensee to correctly apply criteria from ISA Handbook for classifying events as incredible when relying on facility SSCs	WEST	CRIT	VIO	O	L	04/23/09	