

February 17, 2012
REL:12:012



U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Director, Office of Nuclear Material Safety
and Safeguards
11555 Rockville Pike
One White Flint North
Rockville, MD 20852

Gentlemen:

Subject: Response to Notice of Violation (70-1257/2011-005)

Reference: Letter, Marvin D. Sykes to D. Grandemange; "Notice of Violation and
NRC Integrated Inspection Report No. 070-01257/2011-005"; January 25,
2012

Attached is AREVA NP's (AREVA's) response to the violation described in the
referenced letter.

If you have questions or require further information, please contact me at 509-375-8409
or C. D. Manning of my staff at 509-375-8237.

Very truly yours,

A handwritten signature in black ink, appearing to read 'R. E. Link'.

R. E. Link, Manager
Environmental, Health, Safety & Licensing

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IED7

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/mah

Reply to Notice of Violation

NRC Inspection Report 70-1257 / 2011-005; AREVA NP Inc.

Violation VIO 70-1257/2011-005-01

The violation as stated in the referenced Notice of Violation (NOV) is as follows:

Safety Condition S-1 of Special Nuclear Material License No.1227 requires that material be used in accordance with the statements, representations, and conditions in the license application dated October 24, 2006, and supplements thereto.

Section 5.3.1, Management Measures, of the license application states, in part, that the configuration management program includes a requirement that prior to use in a process, nuclear criticality safety controls selected and installed are verified to fulfill the requirements identified in the criticality safety analyses.

Nuclear Criticality Safety Analysis, E04-NCSA-186, Supercritical Carbon Dioxide (CO₂) Extraction System, Version 4, designated High Efficiency Particulate Air (HEPA) Filter Cabinet Criticality Drain (C186DR14) as a nuclear criticality safety control.

Contrary to the above, on May 6, 2010, the licensee failed to verify prior to use in the process that HEPA Filter Cabinet Criticality Drain (C186DR14) was able to fulfill the requirements identified in the criticality safety analyses. Specifically, the licensee failed to verify that drain C186DR14, IROFS 6914, prevented retention of uranyl nitrate solution inside the HEPA filter cabinet beyond a favorable geometry (depth), by directing liquid overflow to the room floor.

This is a Severity Level IV violation (Section 6.2.d).

Reason for the Violation

The review of the Operational Readiness Review package for system 186 regarding the Criticality Drain, C186DR014 was verified to be installed and the required PM/Functional check was verified to have been completed. However, the method used to verify the drain was unobstructed and free flowing did not account for potential blockage by a pre-filter installed in the housing.

The HEPA housing including the drain outlet was fabricated by an offsite provider and installed by AREVA crafts, including the attachment of the drain to the drain outlet. The pre-startup verification that the drain was properly installed and would meet the required safety function was limited to a visual verification that the drain was physically installed and that the preventative maintenance (PM) as a startup functional test was successfully completed. The verification did not include opening up the filter housing and verifying that the drain inlet was unobstructed. A poor assumption was made in that the inspection of the interior of the housing was believed to not be needed to assure that the drain was unobstructed. The personnel involved in the testing didn't believe the design would place a filter directly above a drain intended to keep the interior of the housing from flooding.

An extent of condition investigation and evaluation show that this occurrence was an isolated incident.

Corrective Actions Taken

A number of actions were taken in direct response to this plant condition, as follows:

1. The condition was entered into AREVA's corrective action program (CR 2011-8134).
2. Nuclear Criticality Safety (NCS) completed a plant-wide walk-down of all HEPA filter boxes and verified that none of those that have a criticality drain have a similar design deficiency where the pre-filter or HEPA filter could plug the drain. This walk-down included a comparison with facility P&ID's to assure that the walk-down was complete. No other HEPA filter boxes with criticality drains were identified with the design deficiency described above. (Completed 10.21.2011)
3. NCS completed a plant-wide walk-down of all other criticality drains to determine if potential for plugging due to debris or a similar design deficiency exists as described in CR 2011-7773. This walk-down included a comparison with facility P&ID's to assure that the walk-down was complete. No criticality drains were identified as having a similar design deficiency. (Completed 10.28.2011)
4. A meeting was held with all members of the NCS component to discuss the known aspects of this incident and the need for completeness and attention to detail when verifying / validating data, assumptions, and facility designs associated with requirement implementation. (Completed 11.15.2011)

Actions to Avoid Future Violations

In addition to the actions listed above that have already been taken, the following action is also expected to help prevent a repeat of this type of condition:

1. Richland's Site-Plant Engineering-Tech Support & Maintenance Manager is scheduling the replacement of criticality drains with clear material such that a visual inspection can provide assurance that they remain unobstructed and free flowing. (ECD:06.29.2012).

The corrective and preventive actions as well listed above are expected to prevent a repeat of this condition.

Date of Full Compliance

AREVA believes that it is in full compliance with the subject license condition.