

3)Report Number: NA--SRSO-MOXS-MOX-2008-0007 After 2003 Redesign
Secretarial Office: National Nuclear Security Administration
Lab/Site/Org: Savannah River Site
Facility Name: MOX Fuel Fabrication Facility
Subject/Title: MOX Facility, NRC Notice of Violation
Date/Time Discovered: 08/04/2008 08:00 (ETZ)
Date/Time Categorized: 08/04/2008 10:00 (ETZ)
Report Type: Notification/Final
Report Dates:

| | | |
|----------------|------------|-------------|
| Notification | 08/04/2008 | 10:54 (ETZ) |
| Initial Update | 08/04/2008 | 10:54 (ETZ) |
| Latest Update | 08/04/2008 | 10:54 (ETZ) |
| Final | 08/04/2008 | 10:54 (ETZ) |

Significance Category: 4

Reporting Criteria: 9(2) - Any written notification from an outside regulatory agency that a site/facility is considered to be in noncompliance with a schedule or requirement (e.g., Notice of Violation, Notice of Intent to Sue, Notice of Noncompliance, Warning Letter, Finding of Violation, Finding of Alleged Violation, Administrative Order, or a similar type of notification or enforcement action).

Cause Codes:

ISM: 6) N/A (Not applicable to ISM Core Functions as determined by management review.)

Subcontractor Involved: No

Occurrence Description: NOTICE OF VIOLATION

Shaw AREVA MOX Services Docket No. 70-3098 Aiken, South Carolina Construction Authorization No. CAMOX-001:

During NRC inspection activities conducted between April 1 through June 30, 2008, a violation of NRC requirements was identified. In accordance with the NRC Enforcement Policy, the violation is listed below: Condition 3.A of NRC Construction Authorization No. CAMOX-001 (Revision 2, dated June 12, 2008) authorizes, in part, the applicant to construct a plutonium processing and mixed oxide fuel fabrication plant, known as the Mixed Oxide Fuel Fabrication Facility (MFFF) located at the Department of Energy, Savannah River Site, in accordance with the statements, representations, and conditions of the MOX Project Quality Assurance Plan (MPQAP) dated March 26, 2002 and supplements thereto.

Contrary to the above, on and before June 19, 2008, the applicant failed to implement certain MPQAP and requirements, as enumerated in the following examples:

1. MPQAP, Revision 5, Section 5.1, requires quality-affecting activities to be prescribed by and performed in accordance with documented, approved QA procedures and other approved implementing documents (drawings, specifications, etc.) appropriate to the

MOX Project work scope. Requirement 5.2.2 under this section requires implementing documents to provide a sequential description of work to be performed, and quantitative or qualitative acceptance criteria sufficient for determining activities were satisfactorily accomplished. The applicant failed to provide an approved QA procedure or other approved implementing document which prescribed a sequential description of work to be performed, and quantitative or qualitative acceptance criteria sufficient for determining activities were satisfactorily accomplished during the installation and inspection of exothermic weld splices of ground cables.

2. MPQAP, Revision 5, Section 2.2.6, requires indoctrination, training, and qualification of personnel performing activities affecting quality. Requirement H. 2 requires training procedures to identify technical objectives and requirements of the applicable codes and standards. MOX Services Project Procedure PP3-27, Quality Control Personnel Certification, Section 3.2.4, states inspection personnel shall perform inspection activities only in their areas of certification. Sections 3.4 and 3.6 state areas of certification, including certifications for special applications, will be documented on the qualification summary form, or Certificate of Qualification. Appendix D designates Cadwelding as a certification area for Special Processes. Section 3.1 defines Inspector Training Records as documents containing training objectives, course outlines, reading assignments, tests, and examinations and/or capability demonstrations. The applicant failed to document evaluations of inspector training for Cadweld ground cable splices on the respective Certificates of Qualification, and did not provide a written inspector training record that identified the technical objectives, course outline, or requirements of the applicable codes and standards.

3. MPQAP, Revision 5, Section 17.2.4.C, Record Repositories, requires in part that records shall be stored in either temporary or permanent containers or facilities. According to the MPQAP, temporary storage is defined as a facility or container with a fire rating of at least one (1) hour. The temporary storage container or facility shall bear an underwriters laboratories label (UL) or equivalent, certifying one (1) hour fire protection, or be certified by a person competent in the technical field of fire protection.

The applicant failed to store QA records in temporary storage container or facility bearing an underwriters laboratories label (UL) or equivalent, certifying one (1) hour fire protection, or be certified by a person competent in the technical field of fire protection in the Management Administrative Complex, Construction Administrative Complex and Equipment Engineering Complex buildings. Specifically, QA records, including receipt inspection reports, surveillances of Quality Level -1 items relied on for safety (IROFS), and design drawings, were not stored in fire rated containers prior to transmittal to the permanent record repository.

4. MPQAP, Revision 5, Section 16, Corrective Action, requires in part, that conditions adverse to quality be promptly identified.

a. On June 3, 2008, the applicant failed to identify a condition adverse to quality in that during the BMP-F111 basemat concrete placement, the previously placed concrete had lost its plasticity prior to making the next concrete placement, thus creating a cold joint.

b. On June 19, 2008, the applicant failed to identify during BMP-F112 basemat construction joint inspection activities that foreign material had been left in the construction joint and that there was voiding behind the stay forms.

This is a Severity Level IV violation (Supplement II)

Cause Description:

Operating Conditions:

Normal

Activity Category: Construction

Immediate Action(s): Pending

FM Evaluation:

DOE Facility Representative

Input:

DOE Program Manager

Input:

Further Evaluation is No

Required:

Division or Project: Shaw AREVA MOX Services

Plant Area: F-Area

System/Building/Equipment: MOX Fuel Fabrication Facility

Facility Function: Balance of Plant - Infrastructure (Other Functions not specifically listed in this Category)

Corrective Action:

Lessons(s) Learned:

HQ Keywords:

HQ Summary:

Similar OR Report Number:

Facility Manager:

| | |
|-------|----------------|
| Name | JONES, EMORY H |
| Phone | (803) 819-2332 |
| Title | ES&H ENGINEER |

Originator:

| | |
|-------|----------------|
| Name | JONES, EMORY H |
| Phone | (803) 819-2332 |
| Title | ES&H ENGINEER |

HQ OC Notification:

| Date | Time | Person Notified | Organization |
|------|------|-----------------|--------------|
| NA | NA | NA | NA |

Other Notifications:

| Date | Time | Person Notified | Organization |
|------------|-------------|-----------------|--------------|
| 08/04/2008 | 10:00 (ETZ) | Clay Ramsey | NNSA |
| 08/04/2008 | 10:10 (ETZ) | A.B. Robinson | MOX |
| 08/04/2008 | 10:10 (ETZ) | Howard Lawrence | MOX |
| 08/04/2008 | 10:10 (ETZ) | Dave Stinson | MOX |

Authorized Classifier(AC): Richard Stuhler **Date:** 08/04/2008
