United Plant Guard Workers of America (UPGWA)

Local 66
P.O. Box 1020, Piketon, Ohio 45661

70-7002

DS09
M. Hoon

63FR 24832
May 5, 1998

(1)

Chief, Rules Review & Directives Branch
Office of Administration
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

RECEIVED
1998 JUN 19 PM 4:23
RULES & DIR. BRANCH
US NRC

June 16, 1998

Dear Office of Administration NRC:

This letter is to address United States Enrichment Corporation (USEC) application for renewal of the Portsmouth Gaseous Diffusion Plant based on USEC's previous application, as revised through Revision 19 dated April 15, 1998.

Since the first application and oversight responsibilities started on March 3, 1997, USEC has had many revisions to the complete program and thousands of RAC's to make changes to their original commitments on how USEC was to operate the Portsmouth facility. USEC has been to enforcement conferences, pre-decisional conferences, suspending work due to violations, notice of violations, NIOSH findings, OSHA findings, and the issue of the "Chilling Effects".

Since March 3, 1997 the business of the enrichment of uranium is a new venture for the NRC administration when it comes to the Gaseous Diffusion Plants. The issue of security concerns has been brought to the NRC administration on several occasions. At the Paducah Gaseous Diffusion plant there has been enforcement conferences and fines levied against USEC for poor attention to the security plans and liabilities to the security plan. When the USEC submitted their security plan to the NRC it was to authorize and posses Low Enriched Uranium (LEU) which is Category III material under NRC regulation. It is alarming that USEC was answering to a pre-decisional enforcement conference on June 5, 1998 to the apparent violation 98005-08 (Exceedance of possession limits of Highly enriched Uranium). To add on June 9, 1998 USEC places in the Open Line (an update of business activities at the Portsmouth Gaseous Diffusion Plant) Attachment #1; "The plant potentially exceeded HEU possession limits. (Note that this will likely result in no violation)".

The United Plant Guard Workers of America (UPGWA) Local 66 views this comment to be very serious in itself. The attitude of USEC having prior knowledge or feeling so comfortable to place in the Open Line to all employees "... Note

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P.O. Box 1020, Piketon, Ohio 45661

that this will likely result in no violation", four days after the pre-decisional enforcement conference is simply appalling. The certification issue encompasses the physical protection of LEU of moderate and low strategic significance.

However, USEC has notified your agency (NRC) that the security sweeps of the X326 according to the presentation handout on the pre-decisional conference held on June 5, 1998 subtitled, "Planned Actions" to the apparent violation 98005-08, stated that the sweep "will provide a high degree of assurance that items containing uranium enriched above 10% has been identified". We feel this is not the case when you read and research the problem reports. We have attached Problem Reports for your review that should suggest to your agency that indeed the security sweeps are not being performed as an "excellent job". The procedure of the sweep paraphrased, is to utilize equipment ie. elephant gun, that identifies, characterizes the material and then the sweep personnel determines if the material is above the allowed amount of 10%. Next, is to place the material that is above the NRC limits of 10% and place the material in the DOE Material Storage Area (DMSA). The reason to have the questioning attitude about the integrity of the sweep, and the possibility of compromise, and the statement of USEC having a "high assurance" of no uranium enriched above 10% being left in the X326, is the problem reports and the concerns of the workers who actually worked the sweep jobs. It is so crucial, that your agency NRC needs to understand that the willingness to buy off on the security sweep project will give the employees and public the "false sense of security " that the sweep has been completed and that indeed a "high assurance" that HEU will not be in the facility, and be protected at the level of Category III instead at the level of Category I as it is today will have great implications and cost. Your agency (NRC) is buying off on a project that indeed is not going to give you the "high assurance" that USEC states you will have.

As the results and documentation of the following problem reports, it warrants the reason for NRC to also have the questioning attitude with language of "high assurance" being given at a pre-decisional conference.
Problem Reports are as follows: PTS-98-02857, PTS-9802355, PTS-98-03196, PTS-98-03277, PTS-98-03412, PTS-98-02384, PTS-98-02510, PTS-98-02442, PTS-98-02440, PTS-98-02420, PTS-98-01937. In the cases the HEU being found in the SWEPT area, was after the security police officers were moved due to the direction of

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management because the area had a "high assurance" of no uranium enriched above 10% being left in the area. If the sweep personnel and their highly technological equipment is so efficient to finding and identifying material to the level of "high assurance", then how do we explain the cases from the problem reports of all the HEU found in the SWEPT area after the sweep personnel declared the area free of HEU? Let it be noted that on July 31, 1998 the level of security at the X326 will be down graded to protect at the level of a Category III level. USEC will not be able to fall back on the statement that was used at the pre-decisional conference on June 5, 1998; "X326 building protected at DOE Category I level". Is this statement used at the pre-decisional conference one of "lassie-fair attitude"? If a mistake is made we have the Category I protection level to fall back on, this is not true after July 31, 1998.

We suggest that NRC take a long hard look at the problem reports submitted for your review and conduct interviews with personnel who actually worked and controlled the X326 sweep boundaries. NRC recertifying the Portsmouth Gaseous Diffusion Plant for low level might want to reconsider the approach with the X326 issue, and accepting the level of protection that USEC suggest, "High Assurance". The documented problem reports and the workers concerns should be considered very strongly before signing off on such an important project that has significant impact to the protection and safety of the employees and citizens in the area of the plant. Additionally, serious consideration needs to be given before recertification is approved, before the in depth investigations, interviews has been completed. The renewal of the certification of the Portsmouth Gaseous Diffusion plant located near Piketon, Ohio should be looked at due to questions, concerns, and apparent violations of exceedances of HEU possession limits. We feel very strongly that having exceedances of HEU in a NRC regulated area of Category III protection is serious and should not be taken lightly. How many apparent violations and problem reports of exceedances of HEU needs to be reported before NRC recommends that the contractor and or USEC increases the level of protection?

In conclusion, the recertification of the USEC areas without investigating, interviewing, and increasing the level of protection of the X326 building would be sending the wrong message to the employees, and public when addressing the goals of NRC of placing the safety and health as the importance. If HEU has been missed on several occasions, how much HEU has

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been missed that we have not found? If the HEU is missed after the protection limits are down graded, there is no second chance if the material falls into the wrong hands. NRC's recertification of the gaseous Diffusion Plant needs to have a questioning attitude toward the effort of USEC stating "high assurance".

Sincerely,

John K. Haberthy
President UPGWA

cc: file

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

May 14, 1998

TO: All Persons Interested in Certification of Safe Operation of Gaseous Diffusion Enrichment Plants

SUBJECT: APPLICATION FOR RENEWAL OF CERTIFICATION OF GASEOUS DIFFUSION ENRICHMENT PLANTS

On April 15, 1998, the Nuclear Regulatory Commission received applications for renewal from the United States Enrichment Corporation to renew the Certificates of Compliance for the gaseous diffusion plants located in Paducah, Kentucky and Piketon, Ohio. Attached is the Federal Register notice acknowledging receipt of the renewal application and noticing the public comment period. Interested parties are invited to submit written comments on the application by June 19, 1998. There are no public meetings planned on the renewal applications.

If you have any questions, please contact the Special Projects Branch in Washington, D.C. at (301) 415-7192.

Sincerely,

Robert C. Pierson, Chief
Special Projects Branch
Division of Fuel Cycle Safety
and Safeguards, NMSS

Enclosure: Federal Register Notice

Docket Nos. 70-7001, 70-7002
GDP-1, GDP-2

cc: Interested Persons Lists

9805210099

10pp

NUCLEAR REGULATORY COMMISSION

[Docket Nos. 70–7001, and 70–7002]

United States Enrichment Corporation, Paducah and Portsmouth Gaseous Diffusion Plants, Notice of Receipt of Application for Certification Renewal For the Gaseous Diffusion Plants and Notice of Public Comment Period

I. Receipt of Application and Availability of Documents

Notice is hereby given that the U. S. Nuclear Regulatory Commission (NRC or the Commission) has received by letters dated April 15, 1998, applications from the United States Enrichment Corporation (USEC) for the renewal of the certification of the gaseous diffusion plants (GDPs) located near Paducah, Kentucky and Piketon, Ohio. The NRC issued the initial certification for the GDPs on November 26, 1996 and assumed regulatory oversight for the GDPs on March 3, 1997. The USEC renewal requests are for a five-year period. The USEC applications for renewal do not contain any changes to the existing documentation; previous applications, statements, and reports are incorporated by reference into the renewal application. The USEC application for the renewal of the Paducah Gaseous Diffusion Plant is based on USEC's previous Application, as revised through Revision 24 dated April 15, 1998, and USEC's previous Compliance Plan, as revised through Revision 7 dated March 20, 1998. No additional changes to the application or Compliance Plan are being requested. The USEC application for the renewal of the Portsmouth Gaseous Diffusion Plant is based on USEC's previous application, as revised through Revision 19 dated April 15, 1998, and USEC's previous Compliance Plan, as revised through Revision 6 dated March 12, 1998. No additional changes to the Application or Compliance Plan are being requested.

Copies of the renewal application for certification (except for classified and proprietary portions which are withheld in accordance with 10 CFR 2.790, "Availability of Public Records") are available for public inspection and copying at the Commission's Public Document Room (PDR) in the Gelman Building, 2120 L Street, NW, Washington, DC 20555 and in the Local Public Document Rooms (LPDRs) established for these facilities. A copy of the application for the Paducah plant is available at the Paducah Public Library, 555 Washington Street, Paducah, Kentucky 42003. A copy of the application for the Portsmouth plant is available at the Portsmouth Public Library, 1220 Gallia Street, Portsmouth, Ohio 45662. Copies of related correspondence and staff evaluations (except for portions withheld in accordance with 10 CFR 2.790) will also be made available at these public document rooms.

II. Notice of Comment Period

Any interested party may submit written comments on the renewal application for certification for either the Paducah plant or the Portsmouth plant for consideration by the staff. To be certain of consideration, comments must be received by June 19, 1998.

Comments received after the due date will be considered if it is practical to do so, but the Commission is able to assure consideration only for comments received on or before this date. Written comments on the application should be mailed to the Chief, Rules Review and Directives Branch, Office of Administration, U.S. Nuclear Regulatory Commission, Washington, DC 20555, or may be hand delivered to 11545 Rockville Pike, Rockville, MD 20852 between 7:45 a.m. and 4:15 p.m. Federal workdays. Comments should be legible and reproducible, and include the name, affiliation (if any), and address of the commentor. All comments received by the Commission will be made available for public inspection at the Commission's Document Room located in Washington, DC and the Local Public Document Rooms located in Paducah, Kentucky and Portsmouth, Ohio. In accordance with 10 CFR 76.62 and 76.64, a member of the public must submit written comments to petition the Commission requesting review of the Director's decision on certification renewal.

FOR FURTHER INFORMATION CONTACT: Ms. Merri Horn, (301) 415–8126 or Mr. Yawar Faraz, (301) 415–8113; Office of Nuclear Material Safety and Safeguards, U.S. Nuclear Regulatory Commission, Washington, DC 20555.

Dated at Rockville, Maryland, this 28th day of April 1998.

For the Nuclear Regulatory Commission.

Carl J. Paperiello,

Director, Office of Nuclear Material Safety and Safeguards.

[FR Doc. 98–11913 Filed 5–4–98; 8:45 am]

BILLING CODE 7590–01–P

cc: Interested Persons Lists

Mr. Steve Polston
General Manager
Paducah Gaseous Diffusion Plant
P.O. Box 1410
Paducah, KY 42001

Mr. Larry Jackson
Nuclear Regulatory Affairs Manager
Paducah Gaseous Diffusion Plant
P.O. Box 1410
Paducah, KY 42001

The Honorable Paul Patton
Govenor, Commonwealth of Kentucky
Capitol Building
700 Capitol Avenue
Frankfort, KY 40601

Mr. Crit Luallen, Deputy Secretary
Governor's Executive Cabinet
Capitol Building
700 Capitol Avenue
Frankfort, KY 40601

Dr. John A. Volpe, Ph.D., Manager
Radiation Control Branch
Cabinet for Human Resources
Commonwealth of Kentucky
275 East Main Street
Frankfort, KY 40621-0001

Mr. James E. Bickford, Secretary
Kentucky Cabinet for Natural Resources
and Environmental Protection
Capitol Plaza Tower, 5th Floor
500 Mero Street
Frankfort, KY 40601

Mr. Jack Wilson
Environmental Response Supervisor
Kentucky Cabinet for Natural Resources
and Environmental Protection
Capitol Plaza Tower
500 Mero Street
Frankfort, KY 40601

The Honorable Danny Cope
McCracken County Commission
400 Wilton Circle
Paducah, KY 42300

The Honorable Buz Smith
City Commissioner
247 Old Orchard Road
Paducah, KY 42001

The Honorable Dale Bradford
McCracken County Commissioner
5725 Bradford Road
West Paducah, KY 42086

The Honorable Ned Buchanan
McCracken County Commissioner
1160 Highland Church Road
Paducah, KY 42001

The Honorable Danny B. Orazine
McCracken County Judge Executive
McCracken County Courthouse
Paducah, KY 42003-1797

Mr. Robert Qualls
President
Paducah Chamber of Commerce
P.O. Box 810
Paducah, KY 42002-0810

The Honorable Albert Jones
Mayor of Paducah
P.O. Box 2267
Paducah, KY 42003

The Honorable Zana Renfro
City Commissioner
4805 Stanley Drive
Paducah, KY 42001

The Honorable PJ Grumley
City Commissioner
4339 Miller
Paducah, KY 42001

The Honorable Robert Coleman
City Commissioner
639 N 23rd Street
Paducah, KY 42001

Mr. John Driskill, President
United Plant Guard Workers of America
Local 11
Paducah Gaseous Diffusion Plant
P.O. Box 1410
Hobbs Road
Paducah, KY 42002

Mr. David Fuller, President
Paducah Local No. 3-550
Oil, Chemical & Atomic Workers International Union
2525 Cairo Road
P.O. Box 494
Paducah, KY 42001-0043

Mr. Gregg Bazzell
DOE Safety Representative
Paducah GDP
P.O. Box 1410
Paducah, KY 42001

Dr. Edward S. Ford, Chairman
Central Midwest Interstate
Low-Level Radioactive Waste Commission
1035 Outer Park Drive
Springfield, IL 62704

Reverend Velma M. Shearer
124 Chestnut St., #210
Englewood, OH 45322

Ms. Corinne Whitehead, President
Coalition for Health Concern
Route 9, Box 25
Benton, KY 42025

Mr. Ronald Lamb
10990 Ogden Landing Rd.
Kevil, KY 42053

Mr. Craing Rhodes
3883 Mt. Pleasant Rd.
Brookport, IL 62910

Mr. Rick Cee
Division Director
OSHA Salt Lake Technical Center
1781 South 300 West
P.O. Box 65200
Salt Lake City, UT 84165-0200

Mr. Felix M. Killar, Jr.
Nuclear Energy Institute
1776 I Street, NW
Suite 400
Washington, DC 20006-3708

Mr. Mark Donham
RR#1
Brookport, IL 62910

Ms. Kristi Hanson
RR#1
Brookport, IL 62910

Ms. Jotilley Dortch
4205 Buckner Lane
Paducah, KY 42001

Ms. Diana Salisbury
Sycamore Environmental Awareness Group
7019 Ashbridge Arnheim Road
Sardinia, OH 45171

Mr. A. B. Puckett
6365 Bethel Ch Road
Kevil, KY 42053

Ms. Vina Colley
3706 McDermott Pond Creek
McDermott, OH 45652

Mr. Sherwood Bauman
Save the Wills Creek Water
Resources Committee
6354 Cowgill Lane
Cumberland, OH 43732

Ms. Susan L. Hiatt
Director, OCRE
8275 Munson Road
Mentor, OH 44060-2406

PORTSMOUTH

Mr. Lee Fink
Portsmouth Site Director
USEC Portsmouth Site Office
P.O. Box 800
Piketon, OH 45661

Mr. Morris Brown
Plant Manager
USEC Portsmouth Site Office
P.O. Box 800
Piketon, OH 45661

Mr. Gerry McGuire
Nuclear Regulatory Affairs Manager
USEC Portsmouth Site Office
P.O. Box 800
Piketon, OH 45661

Mr. James R. Williams
Chief of Staff
Ohio Emergency Management Agency
2855 West Dublin-Granville Road
Worthington, OH 43235-2206

Mr. Robert E. Owen, Chief
Bureau of Radiological Health Sciences
Ohio Department of Health
35 East Chestnut Street
P.O. Box 118
Columbus, OH 43266-0588

Mr. Donald Schregardus, Director
Environmental Protection Agency
1800 Watermark Drive
P.O. Box 1049
Columbus, OH 43266-0109

The Honorable H. Cooper Snyder
14th Ohio Senate District
Ohio State House
Broad and High Streets
Columbus, OH 43216

The Honorable Doug White
88th Ohio House District
Ohio House of Representatives
Ohio State House
Columbus, OH 43216

The Honorable Vern Riffe III, Chairman
Scioto Couny Commissioners
Court House Room 104
102 Seventh Street
Portsmouth, Ohio 45662

The Honorable Wayne Bussler
Scioto County Commissioner
Court House Room 104
102 Seventh Street
Portsmouth, Ohio 45662

The Honorable John P. Knauff
Scioto County Commissioner
Court House Room 104
102 Seventh Street
Portsmouth, Ohio 45662

The Honorable Gregg Baver
Mayor of Portsmouth
Municipal Building
728 Second Street
Portsmouth, Ohio 45662

Ms. Mary Moore, Director
Portsmouth Chamber of Commerce
P.O. Box 509
Portsmouth, Ohio 45662

Ms. Kim Campbell
Scioto County Local Emergency
Planning Committee
102 Seventh Street
Portsmouth, Ohio 45662

Mr. Dan DeSantis
President & CEO
Southern Ohio Growth Partnership
1020 7th Street, P.O. Box 509
Portsmouth, Ohio 45662

Mr. Steve Carter
Economic Development Director
Ohio Valley Regional Development Commission
740 Second Street
Portsmouth, Ohio 45662

The Honorable Dean Lightle
Mayor of Piketon
City Building
P.O. Box 562
Piketon, Ohio 45661

Mr. Dave Jones
Vice President, Operations
Ohio Valley Electric Corp.
P.O. Box 468
Piketon, Ohio 45661

Mr. Tom Douglas, President
UPGWA Local 66
P.O. Box 628
Piketon, Ohio 45661

The Honorable John Glenn
U.S. Senate
Room 503
Hart Senate Office Building
Washington, DC 20510

The Honorable R. Michael DeWine
U.S. Senate
Room 140
Russell Senate Office Building
Washington, DC 20510

The Honorable Ted Strickland
U.S. House of Representatives
Room 1107
Longworth House Office Building
Washington, DC 20515

Mr. George Vandemark, Director
Ross County Emergency Management Agency
P.O. Box 87
Chillicothe, OH 45601

Mr. Roger Suppes, Chief
Bureau of Radiation Protection
Ohio Department of Health
35 E. Chestnut, 7th Floor
Columbus, OH 43266-0588

Mr. Thomas C. Douglas, President
United Plant Guard Workers of American
Amalgamated Local Union #66
Piketon, OH 45661

Mr. Dan Minter, President
Oil, Chemical, and Atomic Workers Union
P.O. Box 467
Piketon, OH 45661

-612
21-93)

PROBLEM REPORT

- Use Black Ink and Print Only -

COPY

☐ PGDP ☐ HQ ☒ PORTS

Prepared By	Badge Number	Extension	REPORT NUMBER
Richard Coriell	58954	2212	PR PTS - 98 - 02357

Organization No.: X51 Group No.: 152 Mail Address: MS-1233

Discovery Date: 4-6-98 Discovery Time: 0815 Building No.: X-326 Shift: 0

Drawing / Specification / Procedure No.: _____ Rev.: _____ In Hand Procedure? ☐ Yes ☐ No ☒ N/A

DESCRIPTION OR NATURE OF PROBLEM: (Attach additional sheets if needed)

While performing hold-up MEASUREMENTS IN the X-326 Bldg. At columm R-34 on the operating floor Contractors found (6) SIX ITEMS CONTAINING URANIUM ABOVE 10% ASSAY U-235. ITEMS AND Assays AREAS follows ITEM #1, Pigtail at 94.7% ENRICHMENT, ITEM #2, Pigtail AT 94.7% ENRICHMENT, ITEM #3 Pigtail at 94.7% ENRICHMENT, ITEM #4 Pigtail AT 94.8 % ENRICHMENT, ITEM #5 Pigtail at 93.9 % ENRICHMENT AND ITEM #6 STEEL PIPE AT 81.8% ENRICHMENT.

ACTIONS TAKEN:

Notified Bldg. Supervisor and performed ~~remote~~ RSC 4-6-98 ENRICHment MEASUREMENTS.

Was the Problem Report reviewed with Manager? ☒ Yes ☐ No

ACTIONS RECOMMENDED:

. Material will be quantified on Tuesday April 7, 1998 and material will be stored appropriately starting Wednesday April 8, 1998. Material in question is presently stored within a Material Access Area.

Would you like to have a copy of this report when it is closed? ☒ Yes ☐ No

TO BE COMPLETED BY THE PSS Safeguards is NOT required

TYPE OF SSC: ☐ OSR/TSR ☐ Q Item ☐ Safety System ☐ AQ Item ☐ NCS ☒ N/A

INITIAL ASSESSMENT	Y	N	N/A
. Operability Decision Required	☐	☒	☐
. Is Structure or Component Operable?	☐	☐	☒
. Is System Operable?	☐	☐	☒
. Reportable?	☐	☒	

Categorization Date: 4-6-98 Time: 1640

Justification/Comments/Actions:

- No Safeguards issues noted.
- Ref. PR-PTS-98-02355 for NCS concerns for this issue

4-6-98

Eric R. Goetz
PSS Signature

TO BE COMPLETED BY COMMITMENT MANAGEMENT

Release Condition Code:	Performance Code:	Equipment Code:	Consequence Code:

UE-612
(8-21-96)

PROBLEM REPORT
- Use Black Ink and Print Only -

Page 1 of 1

☐ PGDP ☐ HQ ☑ PORTS

Prepared By	Badge Number	Extension	REPORT NUMBER
TOM SEXTON	58046	6405	PR PTS - 98 02355

Organization No.: X12 Group No.: 740 Mail Address: 4002

Discovery Date: 4-6-98 Discovery Time: 0945 Building No.: X-326 Shift: 0

Drawing / Specification / Procedure No.: _____ Rev.: ____ In Hand Procedure? ☐ Yes ☐ No ☑ N/A

DESCRIPTION OR NATURE OF PROBLEM: (Attach additional sheets if needed)

The Security Sweep Team Located Contaminated Metal parts with High U-235 count. Parts have been stored inside Uranium Material Storage Area. Ref: NCSA-Plant 062. No. 2. All Parts stored on small Cart and wrapped in Plastic Bags. SEA

ACTIONS TAKEN: Stopped Security Sweep Team, Security will not move any parts contacted X-300 PSS of possible NCS concern.
* NCS engr Directed all Parts to be spaced 2" edge to edge. Facility Plan spaced as per Directed.

Was the Problem Report reviewed with Manager? ☑ Yes ☐ No

ACTIONS RECOMMENDED: To Continue Facility Clean-up by Follow All NCSA-Requirements.

Would you like to have a copy of this report when it is closed? ☐ Yes ☐ No

TO BE COMPLETED BY THE PSS Safety Analysis NOT required

TYPE OF SSC: ☐ OSR/TSR ☐ Q Item ☐ Safety System ☐ AQ Item ☑ NCS ☐ N/A

INITIAL ASSESSMENT	Y	N	N/A
1. Operability Decision Required	☐	☑	☐
2. Is Structure or Component Operable?	☐	☐	☑
3. Is System Operable?	☐	☐	☑
4. Reportable?	☑	☐	

Categorization Date: 4/6/98 Time: 2153

Justification/Comments/Actions:
- NCS responded And determined NCSA PLANT 062 A00 Rqt. #5 Violated - loss of one Control
- 24 Hour NRC Event
- Spacing restored At 1130 hours

4-6-98 4/6/98

PSS Signature

TO BE COMPLETED BY COMMITMENT MANAGEMENT

Problem Condition Code:	Performance Code:	Equipment Code:	Consequence Code:

Contingency 17.1

COPY

Checklist for Resolution/Recovery of NCS Anomalous Conditions

Problem Report #PR-PTS-98-02355 Facility X-326 Date 4/6/98 Time 0945

Brief Description of Problem: Several old tiger pigtails (formerly used at PW) were found as a part of potentially contaminated material during a security sweep

Other potentially affected operations: Depending on NDA analysis may exceed material limi for 720 lb materi

Which NCSA(s) apply? NCSA-PLANT062, AOO control #5

If no NCSA applies (or one cannot be determined within 4 hours) the Fissile Material Operation is considered to be unanalyzed. Shutdown the operation and submit event report. FMO is defined as an operation that could involve more than 15g ^{235}U enriched to more than 1% assay. Ref TSR 3.11.2.

Is this a discrepancy in the description of the Fissile Material Operation in Part A of the NCSA? ..... ☐ Yes ☒ No

If YES, does the discrepancy invalidate the evaluation of the FMO? ..... ☐ Yes ☒ No

If YES, shutdown or limit the affected operation and revise the NCSA.

If NO, explain why the discrepancy does not affect the conclusions of the NCSE.

Comments: _____

Is this a potential violation of an NCSA requirement? ..... ☒ Yes ☐ No

If YES, is the requirement an administrative aid or operator aid?

(If YES, this may not be a Reportable Event.) ..... ☐ Yes ☒ No

If NO, is the requirement a contingency control? ..... ☒ Yes ☐ No

If YES, NCS Representative use the NCSA Part C Double Contingency Control Matrix (if present) to assist the PSS in determining whether a 4 hour or 24 hour reportable event exists.

Comments: Control #5, loss of spacing → 24" in edge-to-edge

Why are we safe right now? pig tails were 5 inches in diameter → 5 in diameter is always safe

What actions do we need to take to restore compliance? Space pigtails 24 in edge to edge

What do we need to do to ensure we remain in compliance and when will it be done? _____

NCS Representative	Joh G Rogers	Badge 61266	Date 4/6/98	Time 1445
NCS Representative	Ralph Lemmings Ellen Ells	Badge _____	Date _____	Time _____
FMO Rep. (Opt.)	_____	Badge _____	Date _____	Time _____
PSS	Eric R Jacobs	Badge 56882	Date 4/6/98	Time 1550

NEXT BUSINESS DAY REVIEW:

Response to this NCS anomalous condition is satisfactory. ..... ☐ Yes ☐ No

If NO, write another PR and a Lessons Learned to document why the response was unsatisfactory and recommend a more appropriate response.

UE-612
(8-21-96)

PROBLEM REPORT

- Use Black Ink and Print Only -

Page 1 of ____

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Prepared By	Badge Number	Extension	REPORT NUMBER
Richard L. Coriell	58954	2212	PR PTS - 98 - 03196

Organization No.: X-51 Group No.: 152 Mail Address: 1233

Discovery Date: ~~PDC~~ 5-11-98 Discovery Time: 1550 Building No.: X-100 Shift: 0

Drawing / Specification / Procedure No.: _____ Rev.: _____ In Hand Procedure? ☐ Yes ☐ No ☒ N/A

DESCRIPTION OR NATURE OF PROBLEM: (Attach additional sheets if needed)

While performing hold-up measurements in the X-326 cell floor at column A-63 a 55 gal. Drum of DAW had an enrichment of 13.292% and a Vaccum with a GP Container #009945 with an assay of 17.891% assay was located at column #B-89. Both containers will have quantitative measurements started on Tuesday, May 12, 1998.

ACTIONS TAKEN: Contacted Bldg. Supervisor/FLM

Was the Problem Report reviewed with Manager? ☒ Yes ☐ No

ACTIONS RECOMMENDED:

Quantify assays to determine content. Remove GP Container from Vaccum Cleaner. Move to the appropriate storage location per procedure

Would you like to have a copy of this report when it is closed? ☒ Yes ☐ No

TO BE COMPLETED BY THE PSS Further Analysis Required 1933

TYPE OF SSC: ☐ OSR/TSR ☐ Q Item ☐ Safety System ☐ AQ Item ☑ NCS ☐ N/A

INITIAL ASSESSMENT	Y	N	N/A
1. Operability Decision Required	☐	☐	☑
2. Is Structure or Component Operable?	☐	☐	☑
3. Is System Operable?	☐	☐	☑
4. Reportable?	☐	☑	

Categorization Date: 5/11/98 Time: 1859

Justification/Comments/Actions:

- Quantitative analysis being performed 5/12/98
- No possession limit concerns this time
- NCS field representative investigated, no NCS issues identified, NSA compliance maintained
- security notified

Kurt Sisler
PSS Signature

TO BE COMPLETED BY COMMITMENT MANAGEMENT

Process Condition Code:	Performance Code:	Equipment Code:	Consequence Code:

UE-612
(8-21-96)

PROBLEM REPORT
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☐ PGDP ☐ HQ ☒ PORTS

Prepared By	Badge Number	Extension	REPORT NUMBER
RICK CORIELL	58954	8212	PR PTS . 98 . 03277

Organization No.: X51 Group No.: 152 Mail Address: 1233

Discovery Date: 5-14-97 Discovery Time: 1715 Building No.: X-326 Shift: 0

Drawing / Specification / Procedure No.: _____ Rev.: ____ In Hand Procedure? ☐ Yes ☐ No ☒ N/A

DESCRIPTION OR NATURE OF PROBLEM: (Attach additional sheets if needed)
AS PART OF THE X-326 CONFIRMATORY MEASUREMENT PROJECT THE FOLLOWING GP CONTAINERS WERE FOUND WHICH EXCEED 10% 235. GP#006152, 13.5% ENRICHMENT, GP#009241, 12.6% ENRICHMENT, GP#009021 13.4% ENRICHMENT GP#05597, 13.05% ASSAY, GP#008743, 12.1% ASSAY, GP000795, 13.1% ASSAY, GP#009036, 13.2% ASSAY, GP#009019, 14.3% ASSAY, GP#009031, 12.5% ASSAY, GP#008992, 12.77% ASSAY, GP#009235, 14.145% ASSAY, GP#008428, 13.4% ASSAY, GP#009553, 15.4% ASSAY, GP#008492 9.971% ASSAY.

ACTIONS TAKEN:
ENRICHMENT MEASUREMENTS COMPLETED ON 5-14-97. ON 5-15-97 MATERIAL WILL BE MOVED TO THE NDA LAB TO PERFORM QUANTITATIVE MEASUREMENTS. CONTACTED BUILDING FLM. ALL MATERIAL IS CONTAINERIZED AND PROPERLY SPACED AT COLUMNS B-82

Was the Problem Report reviewed with Manager? ☐ Yes ☒ No

ACTIONS RECOMMENDED:
UPON COMPLETION OF QUANTITATIVE MEASUREMENTS THE MATERIAL WILL BE PROPERLY DISPOSITIONED BY LOCATING IT IN THE X-326 L-CAGE

Would you like to have a copy of this report when it is closed? ☒ Yes ☐ No

TO BE COMPLETED BY THE PSS SA REVIEW NOT REQUIRED - MMS 5-14-98

TYPE OF SSC: ☐ OSR/TSR ☐ Q Item ☐ Safety System ☐ AQ Item ☐ NCS ☐ N/A

INITIAL ASSESSMENT	Y	N	N/A
1. Operability Decision Required	☐	■	☐
2. Is Structure or Component Operable?	☐	☐	■
3. Is System Operable?	☐	☐	■
4. Reportable?	☐	■	

Categorization Date: 5/14/98 Time: 1821

Justification/Comments/Actions:
STORED IN MAA
NO SECURITY CONCERNS.
NEEDS ~~QUANTIFIED~~ BY ANTS TO MOVE TO QUANTIFIED
L CAGE

Richard A Lasa
PSS Signature

TO BE COMPLETED BY COMMITMENT MANAGEMENT

Process Condition Code:	Performance Code:	Equipment Code:	Consequence Code:

UE-612
(8-21-96)

PROBLEM REPORT
- Use Black Ink and Print Only -

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☐ PGDP ☐ HQ ☒ PORTS

Prepared By	Badge Number	Extension	REPORT NUMBER
TERRY SENSLE	U001048	2471	PR PTS - 98 - 0342

Organization No.: 28 Group No.: 890 Mail Address: 1213

Discovery Date: 5/20/98 Discovery Time: 10 00/2 Building No.: X-326 Shift: 0

Drawing / Specification / Procedure No.: SAR TABLE 1-3 C Rev.: ____ In Hand Procedure? ☐ Yes ☐ No ☒ N/A

DESCRIPTION OR NATURE OF PROBLEM: (Attach additional sheets if needed)

DOCUMENT EEI 98015-08 RECEIVED FROM NRC WHICH CITES PORTS POSSESSING MORE THAN 1000 grams OF U235 TO GREATER THAN 20% BY WEIGHT.

ACTIONS TAKEN:

PR-PTS-98-03357 WRITTEN ON 4/6/98 AFTER "SECURITY SWEEP" DISCOVERED MATERIAL ITEMS TRANSFERED TO DOE REGULATED STORAGE AREA IN ACCORDANCE WITH PLANT POLICY.

Was the Problem Report reviewed with Manager? ☒ Yes ☐ No

ACTIONS RECOMMENDED:

ASSIGN TO D SENSLEY AS A REGULATORY/SCAQ FOR NRC ENFORCEMENT CONFERENCE PREPARATIONS.

Would you like to have a copy of this report when it is closed? ☐ Yes ☒ No

TO BE COMPLETED BY THE PSS Further Shutdown Req'd 5/20/98 1340

TYPE OF SSC: ☐ OSR/TSR ☐ Safety System ☐ NCS ☐ Q Item ☐ AQ Item ☒ N/A

INITIAL ASSESSMENT	Y	N	N/A
1. Operability Decision Required	☐	☒	☐
2. Is Structure or Component Operable?	☐	☐	☒
3. Is System Operable?	☐	☐	☒
4. Reportable?	☐	☒	

Categorization Date: 5/20/98 Time: 1042

Justification/Comments/Actions:
Compliance Plan issue
NRA-98-03 SUBMITTED P.R.

Richard A Jones
PSS Signature

TO BE COMPLETED BY COMMITMENT MANAGEMENT

Process Condition Code:	Performance Code:	Equipment Code:	Consequence Code:

UE-612
(8-21-96)

PROBLEM REPORT

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Page 1 of _____

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Brent McGinnis (Prepared By)	59603 (Badge Number)	5758 (Extension)	REPORT NUMBER
Organization No.: X-38	Group No.: 344	Mail Address: 2214	PR PTS - 98 - 02384

Discovery Date: 4/7/98 Discovery Time: 13:10 Building No.: X-326 Shift: 0

Drawing / Specification / Procedure No.: N/A Rev.: _____ In Hand Procedure? ☐ Yes ☑ No ☐ N/A

DESCRIPTION OR NATURE OF PROBLEM: (Attach additional sheets if needed) The X-326 Sweep personnel have identified a trap on a piece of equipment located in USEC space that is greater than 10% (NDA measurements indicate 35.2 ± 2.8% by wt ^{235}U at 1 standard deviation). The item is located near column N33 on the operating floor.

ACTIONS TAKEN: Notified facility manager. We are in the process of performing quantitative NDA measurements on the item. Notified Nuclear Material Control & Accountability personnel.

Was the Problem Report reviewed with Manager? ☐ Yes ☑ No

ACTIONS RECOMMENDED: Once NDA measurements are completed the item should be moved to a DOE material storage area.

Would you like to have a copy of this report when it is closed? ☑ Yes ☐ No

TO BE COMPLETED BY THE PSS Safety Analysis NOT required

TYPE OF SSC: ☐ OSR/TSR ☐ Q Item ☐ Safety System ☐ AQ Item ☐ NCS ■ N/A

INITIAL ASSESSMENT	Y	N	N/A
1. Operability Decision Required	☐	■	☐
2. Is Structure or Component Operable?	☐	☐	■
3. Is System Operable?	☐	☐	■
4. Reportable?	☐	■	

Categorization Date: 4/7/98 Time: 1846

Justification/Comments/Actions:

- NO APPARENT NCSA ISSUE
- POTENTIAL COMPLIANCE PLAN ISSUE W/EXCEEDING USEC/LMHS POSSESSION LIMIT OF MATERIAL ABOVE 20% ENRICHMENT
- ANT TO PERFORM QUANTITATIVE NDA MEASUREMENTS WHICH WILL ALLOW DISPOSITION

4-7-98

PSS Signature

TO BE COMPLETED BY COMMITMENT MANAGEMENT

Process Condition Code:	Performance Code:	Equipment Code:	Consequence Code:

Rc D/210 (01-R30-N92)-PORTS

UE-812
(8-21-96)

PROBLEM REPORT
- Use Black Ink and Print Only -

☐ PGDP ☐ HQ ☒ PORTS

Richard Cargill	58954	2212
Prepared By	Badge Number	Extension

Organization No.: X-51 Group No.: 152 Mail Address: MS-1253

REPORT NUMBER: PR PTS - 98 - 0251O

Discovery Date: 4-12-98 Discovery Time: 1800 Building No.: X-326 Shift: C

Drawing / Specification / Procedure No.: _____ Rev.: _____ In Hand Procedure? ☐ Yes ☐ No ☐ N/A

DESCRIPTION OR NATURE OF PROBLEM: (Attach additional sheets if needed)

While performing hold-up measurements in the X-326 Facility At Column R-45, ~~and~~ DOC 4-13-98 V-39, and V-46 on the operating floor (6) six items containing U-235 above 10% assay were found. The items and assays are as follows: Item 6, Column R-45, Assay 88.232% (Pressure Transmitter) Item B, Column R-45, Assay 94.398% (Pressure Transmitter), Item 14, Column R-45 38.566% Assay (Pressure ~~Transmitter~~ DOC 4-13-98) Item A at Column V-39, Assay 32.864 (Pressure Transmitter) Item B, Column V-39 Assay 83.460% (Pressure Transmitter, Item C, column V-40, Assay 44.020% (Pressure Trans.)

ACTIONS TAKEN:

Notified Bldg. Supervisor and performed enrichment measurements.

Was the Problem Report reviewed with Manager? ☒ Yes ☐ No

ACTIONS RECOMMENDED:

Material will be quantified on Tuesday April 14, 1998 and once the quantity is known the material will be stored properly.

Would you like to have a copy of this report when it is closed? ☒ Yes ☐ No

TO BE COMPLETED BY THE PSS SA REVIEW NOT REQUIRED until 4-13-98

TYPE OF SSC: ☐ OSR/TSR ☐ Q Item ☐ Safety System ☐ AQ Item ☐ NCS ☒ N/A

INITIAL ASSESSMENT	Y	N	N/A
1. Operability Decision Required	☐	☒	☐
2. Is Structure or Component Operable?	☐	☐	☒
3. Is System Operable?	☐	☐	☒
4. Reportable?	☐	☒	

Categorization Date: 4/13/98 Time: 1742

Justification/Comments/Actions:

- NO NCS ISSUES PER NCS DEPT. MGR'S PLANT-062 REVD.
- NO SECURITY ISSUES ITEMS STORED CORRECTLY.
- NMC&A MGR. ADVISED.
- AWAITING FOR MATL TO BE QUANTIFIED.

Greg Bard
PSS Signature

TO BE COMPLETED BY COMMITMENT MANAGEMENT

Process Condition Code:	Performance Code:	Equipment Code:	Consequence Code:

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UE-612
(6-21-96)

PROBLEM REPORT

- Use Black Ink and Print Only -

☐ PGDP ☐ HQ ■ PORTS

Prepared By	Badge Number	Extension
RICK CORIELL	58954	2212

Organization No.: X-51 Group No.: 102 Mail Address: 1233

REPORT NUMBER: PR PTS - 98 - 0244

Discovery Date: 4-9-98 Discovery Time: 1505 Building No.: X-326 Shift: 0

Drawing / Specification / Procedure No.: _____ Rev.: _____ In Hand Procedure? ☐ Yes ☐ No ☒ N/A

DESCRIPTION OR NATURE OF PROBLEM: (Attach additional sheets if needed)

While performing hold-up measurements in the X-326 Facility At Column G-25 on the operating floor, Contractors found three containers of uranium with enrichment above 10% Assay U-235. Containers and Assays are as follows: Container #1 No GP009937, Assay 12.182%, Container #2 No GP009938, Assay 12.413%, Container #3 No. GP009925, Assay #10.830

ACTIONS TAKEN:

Notified Bldg. Supervisor and performed enrichment measurements
Notified PSS Office

Was the Problem Report reviewed with Manager? ☒ Yes ☐ No

ACTIONS RECOMMENDED:

Measure for Quantification and disposition material Appropriately

Would you like to have a copy of this report when it is closed? ☒ Yes ☐ No

TO BE COMPLETED BY THE PSS Safety Analysis NOT required

TYPE OF SSC: ☐ OSR/TSR ☐ Q Item ☐ Safety System ☐ AQ Item ☐ NCS ■ N/A

Justification/Comments/Actions:
- NEED TO HAVE NMC&A CALCULATE POSSESSION LIMITS UNDER COMPLIANCE PLAN.

4-9-98

INITIAL ASSESSMENT	Y	N	N/A
1. Operability Decision Required	☐	■	☐
2. Is Structure or Component Operable?	☐	☐	■
3. Is System Operable?	☐	☐	■
4. Reportable?	☐	■	

Categorization Date: 4/9/98 Time: 1928

PSS Signature

TO BE COMPLETED BY COMMITMENT MANAGEMENT

Process Correction Code: Performance Code: Reviewed Date:

UE-612
(8-21-96)

PROBLEM REPORT

- Use Black Ink and Print Only -

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☐ PGDP ☐ HQ ☒ PORTS

Prepared By	Badge Number	Extension
LISA JENKINS	60812	3601

Organization No.: X-38 Group No.: 300 Mail Address: 502C

REPORT NUMBER

PR PTS - 98 - 02440

Discovery Date: 4/9/98 Discovery Time: 1335 Building No.: X-326 Shift: 0

Drawing / Specification / Procedure No.: UE2-HP-RP1030 Rev.: 1 In Hand Procedure? ☐ Yes ☒ No ☐ N/A

DESCRIPTION OR NATURE OF PROBLEM: (Attach additional sheets if needed)

Pigtail found in clean area on floor on west side ACR 4. No radiological material tag found on pigtail. No boundary or posting of any kind around the pigtail.

ACTIONS TAKEN: Survey of pigtail and floor taken. No loose contamination was found. Enlarged nearby boundary to encompass pigtail.

Was the Problem Report reviewed with Manager? ☐ Yes ☒ No

ACTIONS RECOMMENDED:

All Radioactive material must be in proper locations and ~~RP~~ 4/9/98 as determined by conduct of Radiological procedures.

Would you like to have a copy of this report when it is closed? ☐ Yes ☐ No

TO BE COMPLETED BY THE PSS Safety Analysis NOT required

TYPE OF USQ: ☐ OSR/TSR ☐ Q Item ☐ Safety System ☐ AQ Item ☐ NCS ☒ N/A

Justification/Comments/Actions:

H.P and building issue for controlling ~~RA~~ radioactive material.

4-9-98

INITIAL ASSESSMENT	Y	N	N/A
1. Operability Decision Required	☐	☒	☐
2. Is Structure or Component Operable?	☐	☐	☒
3. Is System Operable?	☐	☐	☒
4. Reportable?	☐	☒	

Categorization Date: 4/9/98 Time: 1850

Richard A. Jaynes
PSS Signature

TO BE COMPLETED BY COMMITMENT MANAGEMENT

Process Condition Code:	Performance Code:	Equipment Code:	Consequence Code:

COPY

Checklist for Resolution/Recovery of NCS Anomalous Conditions

Problem Report # _____ Facility X-326 Date 4/8/98 Time 1300

Brief Description of Problem: 2 SMALL DIAMETER CONTAINERS FOUND IN STORAGE AREA NEAR COLUMN G-24 WITH ENRICHMENT GREATER THAN 10% U-235

Other potentially affected operations: _____

Which NCSA(s) apply? PLANT 006, A03

If no NCSA applies (or one cannot be determined within 4 hours) the Fissile Material Operation is considered to be unanalyzed. Shutdown the operation and submit event report. FMO is defined as an operation that could involve more than 15g ^{235}U enriched to more than 1% assay. Ref TSR 3.11.2.

Is this a discrepancy in the description of the Fissile Material Operation in Part A of the NCSA? ..... ☐ Yes ☒ No

If YES, does the discrepancy invalidate the evaluation of the FMO? ..... ☐ Yes ☐ No

If YES, shutdown or limit the affected operation and revise the NCSA.

If NO, explain why the discrepancy does not affect the conclusions of the NCSE.

Comments: _____

Is this a potential violation of an NCSA requirement? ..... ☐ Yes ☒ No

If YES, is the requirement an administrative aid or operator aid? _____

(If YES, this may not be a Reportable Event.) ..... ☐ Yes ☐ No

If NO, is the requirement a contingency control? ..... ☐ Yes ☐ No

If YES, NCS Representative use the NCSA Part C Double Contingency Control Matrix (if present) to assist the PSS in determining whether a 4 hour or 24 hour reportable event exists.

Comments: _____

Why are we safe right now? PLANT 006 COVERS THIS STORAGE AREA AND THESE TYPES OF CONTAINERS. CONTENTS OF CONTAINERS MET REQUIREMENTS OF PLANT 006 AND ITEMS STORED ARE STORED PER PLANT 006 REQUIREMENTS. THERE IS NO NCS VIOLATION.

What actions do we need to take to restore compliance? _____

What do we need to do to ensure we remain in compliance and when will it be done? _____

NCS Representative	RE Lemming	Badge 58296	Date 4/8/98	Time 2211
NCS Representative	DM DAcunti	Badge 54339	Date 4/2/98	Time 2219
FMO Rep. (Opt.)		Badge	Date	Time
PSS		Badge 55676	Date 4/8/98	Time 2330

NEXT BUSINESS DAY REVIEW:

Response to this NCS anomalous condition is satisfactory. ..... ☐ Yes ☐ No

If NO, write another PR and a Lessons Learned to document why it

UE-612
(8-21-96)

PROBLEM REPORT
- Use Black Ink and Print Only -

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Page 1 of ____

☐ PGDP ☐ HQ ☒ PORTS

Prepared By	Badge Number	Extension	REPORT NUMBER
Richard L. Coriell	58954	2212	PR PTS - 98 - 02420

Organization No.: X-51 Group No.: 152 Mail Address: MS-1233

Discovery Date: 4-8-98 Discovery Time: 1300 Building No.: X-326 Shift: 0

Drawing / Specification / Procedure No.: _____ Rev.: ____ In Hand Procedure? ☐ Yes ☐ No ☐ N/A

DESCRIPTION OR NATURE OF PROBLEM: (Attach additional sheets if needed)

While performing hold-up measurements in the X-326 facility at Column G-24 on the operating floor, Contractors found three Containers of Uranium with enrichment above 10% Assay U-235. Containers and Assays are as follows; Item #2 Container #551180, Poly Bottle with enrichment of 14.16% Assay, Item #3 GP Container #GP009507 with enrichment of 36.53% Assay and Item #3 Container #GP005327 with enrichment of 84.74% Assay.

ACTIONS TAKEN:

Notified Bldg. Supervisor and performed enrichment measurements. Notified PSS office

Was the Problem Report reviewed with Manager? ☒ Yes ☐ No

ACTIONS RECOMMENDED:

Measure for Quantification and disposition material Appropriately

Would you like to have a copy of this report when it is closed? ☒ Yes ☐ No

TO BE COMPLETED BY THE PSS (Safety Analysis NOT required 4-9-98)

TYPE OF SSC: ☐ OSR/TSR ☐ Q Item ☐ Safety System ☐ AQ Item ☒ NCS ☐ N/A

INITIAL ASSESSMENT	Y	N	N/A
1. Operability Decision Required	☐	☒	☐
2. Is Structure or Component Operable?	☐	☐	☒
3. Is System Operable?	☐	☐	☒
4. Reportable?	☐	☒	

Categorization Date: 4/8/98 Time: 2339

Justification/Comments/Actions:

- PLANT 006 COVERS THIS STORAGE AREA. RCL 4/8/98
- NO NCS VIOLATION

PSS Signature

TO BE COMPLETED BY COMMITMENT MANAGEMENT

Process Condition Code:	Performance Code:	Equipment Code:	Consequence Code:

JE-612
8-21-96)

PROBLEM REPORT
- Use Black Ink and Print Only -

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Page 1 of ____

☐ PGDP ☐ HQ ☒ PORTS

Prepared By	Badge Number	Extension	REPORT NUMBER
Rick Cordell	58954	2212	PR PTS - 98 - 0193 7

Organization No.: X-51 Group No.: 152 Mail Address: 1233

Discovery Date: 3-20-98 Discovery Time: 1610 Building No.: X-326 Shift: 0

Drawing / Specification / Procedure No.: _____ Rev.: ____ In Hand Procedure? ☐ Yes ☐ No ☒ N/A

DESCRIPTION OR NATURE OF PROBLEM: (Attach additional sheets if needed)
While performing Hold-up measurements in the X-326 bldg ing at column 100 on Always-safe vacum cleaners ANT and Contractor personnel discovered vacums #SV-003 and #SV-002 to contain U-235 above 10% assay in the roughing filters, Cart # SV003 and ANT sticker #013812 has an assay of 15.678% U-235 and Cart #SV-002 and ANT sticker #013813 has an assay of 18.619% U-235.

ACTIONS TAKEN:
Placed Seal #18003 and #18004 on the roughing filer of Cart #SV-002, seals #18002 and #18001 placed on roughing filter of Cart #SV-003.

Was the Problem Report reviewed with Manager? ☒ Yes ☐ No

ACTIONS RECOMMENDED:
Filters will be quantified by Wednesday March 25, 1998 and Filters will be stored appropriately on thursday March 26, 1998 once the quantity is known. Filters are stored within a material access area.

Would you like to have a copy of this report when it is closed? ☒ Yes ☐ No

TO BE COMPLETED BY THE PSS S-Liq Analysis Not required 3-21-98

TYPE OF SSC: ☐ OSR/TSR ☐ Q Item ☐ Safety System ☐ AQ Item ☐ NCS ■ N/A

INITIAL ASSESSMENT	Y	N	N/A
1. Operability Decision Required	■	☐	☐
2. Is Structure or Component Operable?	■	☐	☐
3. Is System Operable?	■	☐	☐
4. Reportable?	☐	■	

Categorization Date: 3/20/98 Time: 2341

Justification/Comments/Actions:
- AQ-NCS ITEM
- ASSAY WITHIN ALLOWABLE LIMITS FOR LAMS POSSESSION per slacks
- ASSAY WITHIN WITHIN ALLOWABLE NCSA REQUIREMENTS

PSS Signature

TO BE COMPLETED BY COMMITMENT MANAGEMENT

Process Condition Code:	Performance Code:	Equipment Code:	Consequence Code:

lc D/210 (01-R30-N92)-PORTS

Final

USEC
A Global Energy Company

UNITED STATES ENRICHMENT CORPORATION
PORTSMOUTH GASEOUS DIFFUSION PLANT
PRE-DECISIONAL ENFORCEMENT CONFERENCE

June 5, 1998

AGENDA

A.	Introduction	J. Miller
B.	Apparent Violations 98005-01 and 98005-02 (Control of Plant Components that contain Uranium Deposits Greater than Safe Mass)	S. Fout
C.	Apparent Violations 98005-04 thru 98005-06 (Operation of an Autoclave with a Safety Valve Actuator Improperly Installed)	P. Musser
D.	Apparent Violation 98005-07 (Maintenance and Surveillance Activities Associated with Air Operated Safety Valves on the Autoclaves)	M. Hasty
E.	Apparent Violation 98005-08 (Exceedance of Possession Limits)	D. Shisler
F.	Concluding Remarks	M. Brown

Appendix (Summary of Test Results of Air Operated Valves)

Control of Plant Components that Contain

Uranium Deposits Greater than Safe Mass

BACKGROUND

- TSRs 2.2.3.15/2.7.3.14 contain conditions for PEH deposits:
  - Condition A requires deposits be maintained in a fluorinating environment.
  - Condition B requires that deposits not in a fluorinating environment be pressured to $\geq$ 14 psia within 8 hours of identification.
- Fluorinating environment:
  - Presence of a measurable concentration of UF_6, ClF_3, or F_2.
  - Determined by a UF_6 concentration > 20 ppm at 1 psia or >1 ppm at atmosphere.

CELL 29-3-6

- USEC has determined that a fluorinating environment was maintained for this cell. Therefore, a TSR violation did not occur. This event did reveal weaknesses in our cell sampling program.

Chronology of Events		
Date	Time	Description
5/5	0915	2 samples taken (1 from stage 1, and 1 from stage 2) at the Local Control Center (LCC)
5/5	1115	Sample results obtained, both samples showed that a fluorinating environment existed. - Stage 1 had low UF_6 concentration (22.31ppm). - Stage 2 had high UF_6 concentration (1412.4 ppm). (Note: the IR incorrectly states that the sample from stage 1 showed that a fluorinating environment did not exist.)
5/5	1230 and 1404	Resamples were taken from Stages 1 and 3 at the LCC, respectively.
5/5	1630	• Sample results obtained - Stage 1 showed that a fluorinating environment does not exist (10.53 ppm). - Stage 3 showed that a fluorinating environment exists (2630.1ppm). • First Line Manager discusses the sample results with the Building Manager. These individuals determined that a fluorinating environment existed and that there was an anomaly with the stage 1 sample results.

CELL 29-3-6 (cont'd)

Chronology of Events		
Date	Time	Description
5/6	~0700 to noon	• Building Manager initiates investigation of sample results from Stage 1 to determine if there is wet air inleakage • FLM walks down sample lines; no evidence of wet air inleakage observed.
5/6	1444 and 1644	Samples were taken again for stage 1 and 3, respectively. Samples were taken at the blowout preventer (BOP) nearest to the compressor and the deposit.
5/6	1535 and 1800	Sample results obtained. The samples from both stages showed that a fluorinating environment did not exist.
5/6	~1800	TSR action statement is entered and cell is pressurized.

- Further investigation has determined that samples taken from stages 1 and 3 at the BOP were not representative since the cell was in a static condition (i.e., the compressor was shutdown).
- On June 1, 1998, the cell sampling procedure was revised to address sampling shutdown cells at BOP

CELL 29-5-2

Background

- On April 7, 1998, samples taken from this cell showed it was in a fluorinating environment but had low UF_6 concentration.

- Resamples taken on April 8, 1998.
  - Fluorinating environment did not exist for this cell.
  - Cell was pressurized in accordance with the TSR.

- During further review of the cell conditions, the Cascade Controller identified that the previous week's samples had not been recorded.

- Cascade Controller requested and received the March 31, 1998, sample results.
  - Sample results also indicated that a fluorinating environment did not exist for this cell.
  - Results of the samples were not processed and communicated to Operations in a timely manner (i.e., 8 days vice hours).
  - Operations personnel failed to follow-up with the laboratory as to the results of the sample.

CELL 29-5-2 (cont'd)

Root Causes

1. Lack of a procedure for verifying fluorinating environment for PEH deposits.

2. Compensatory actions implemented on January 30, 1998, did not contain sufficient rigor:

   a. No requirements to submit written requests for samples;
   b. No requirements to provide written sample results;
   c. Did not address timeliness of communicating sample results;
   d. Did not address actions to take for anomalous sample results.

CELL 29-5-2 (cont'd)

Immediate Corrective Actions

- DOIs revised on April 20, 1998 to include additional controls: (Root Cause #2)
  - Requirements to submit written requests for lab samples weekly.
  - Requirements to notify the lab of specific reporting constraints.
  - Requirements for lab personnel to provide written sample results within 4 hours from obtaining samples.
  - Requirements to record and trend the data and identify if an adverse condition is developing so prompt mitigating actions can be initiated prior to exceeding authorized safety limits.

- Training was conducted for Laboratory and Cascade Control personnel on communication of sample results

Additional Corrective Actions

- Issued a PEH tracking procedure on May 11, 1998 which superseded the DOIs. (Root Cause #1)

- Actions to address anomalous sampling results.

- An "extent of condition" review will be completed by October 2, 1998, to determine if there are other TSR requirements that require additional procedural coverage.

CELL 29-5-2 (cont'd)

Mitigating Factors

- There was no possibility of an unplanned criticality in cell 29-5-2 :
  - Cell 29-5-2 was taken off-stream in July 1997 due to plugging. The cell was evacuated but not purged to a UF_6 negative. From February 4, 1998, to March 24, 1998, the cell showed positive results for UF_6 and maintained a constant pressure of 6.5 psia.
  - If cell 29-5-2 had wet air inleakage, at plant temperature and moisture conditions, it would take 2.7 years to accumulate enough moisture to achieve optimum moderation of this size deposit at 5.5% enrichment.
  - The size of this deposit is less than the minimum critical mass of a UO_2F_2 deposit at an enrichment of 5.5% , with optimum geometry and full reflection.
- This event was self-identified and reported to NRC in accordance with Bulletin 91-01.
- USEC does not believe that escalated enforcement action is warranted.
  - Issue is of low safety significance.
  - Only one example of failure to meet TSR.

Operation of an Autoclave with a Safety Valve

Actuator Improperly Installed

BACKGROUND

3/24/98 - Actuator for Autoclave Containment Isolation Valve FV-416X replaced.

- Work was to be performed in accordance with procedure XP4-TE-MM4104.
- This procedure was revised on December 13, 1996, to provide detailed guidance to assure proper actuator installation.
- The Maintenance Mechanic performing replacement did not follow procedure. As a result, the actuator was installed incorrectly.
- The mechanic believed that "General Intent" procedures did not need to be followed verbatim.
- Procedure UE2-PS-PS1034 states that "General Intent" procedures are to be followed as written.
- An operational check was not performed as required by XP4-TE-MM4104.

BACKGROUND (cont'd)

3/25/98	The operator performing the Post Maintenance Test (PMT) failed to recognize the improper valve position indication and signed off the test as satisfactorily completed.
3/25-27/98	Two cylinders are fed from the autoclave.
3/27/98	While performing a conductivity cell test, an operator discovers that FV-416X is operating opposite its design function.

ROOT CAUSES

1. Failure to follow procedure due to a lack of understanding regarding compliance with "General Intent" procedures.

2. Lack of procedure guidance for developing and performing PMTs.

Contributing Causes:

1. When the criteria for an "In-Hand" procedure was revised in August 1997, a review was not performed to determine if existing "General Intent" procedures should be recategorized.

2. The training module concerning use of procedures was inconsistent with UE2-PS-PS1034, "Use of Procedures" regarding compliance with "General Intent" procedures.

3. Procedure XP4-TE-MM4104 does not provide specific guidance as to what an "operational check" involves.

4. Poor communication between operators during the performance of the PMT.

CORRECTIVE ACTIONS

Immediate Corrective Actions

- On March 27, 1998, valve actuator was removed, reoriented to its correct position, and a satisfactory PMT (including a leak rate test) was performed.
- Valve actuators on the other autoclaves were verified to be in the proper orientation.
- Other actuators that are known to have been replaced were inspected to determine compliance with procedure XP4-TE-MM4104.
- Briefings were conducted with Operations and Maintenance personnel on the "Lessons Learned" from this event. (RC #1)
- Maintenance personnel were instructed to treat "General Intent" procedures similar to "In-Hand" (this is a temporary measure pending a more in-depth review to determine proper categorization). (RC#1)
- The procedure requirements for proper installation of valve actuators have been reviewed with maintenance personnel in the X-340 complex. (RC#1)

CORRECTIVE ACTIONS (cont'd)

Immediate Corrective Actions (cont'd)

- The PMT requirements for replacement of actuators have been revised to include leak rate testing per the Technical Safety Requirements. (RC#2)

- Peer reviews of PMTs were instituted by Engineering to ensure that TSR surveillances and the requirements of the Quality Assurance Plan (QAP) are met for TSR related structures, systems, and components. (RC#2)

- The training module on the use of "General Intent" procedures has been revised. (CC#2)

Additional Corrective Actions

- Conduct site meetings by June 19, 1998, to emphasize the importance of procedural adherence. (RC#1)

- Revise procedure XP4-TE-MM4104 by July 1, 1998, to enhance the criteria for ensuring correct actuator installation. (CC#3)

CORRECTIVE ACTIONS (cont'd)

Additional Corrective Actions (cont'd)

- Revise the affected autoclave startup procedures by August 14, 1998, to include steps for checking applicable containment valve position.

- Review and develop a schedule to revise those "General Intent" procedures which should be recategorized as "In Hand," by September 30, 1998. (CC#1)

- Review and, as necessary, revise the PMT requirements by June 19, 1998, for autoclave work packages. (RC#2)

- Re-emphasize management expectations on Conduct of Operations by July 31, 1998, with Operations personnel. (CC#4)

- The PORTS Safety and Safeguards Quality (SS&Q) organization performed an assessment of the PORTS PMT program. Recommendations were made to improve the PORTS PMT program.

- Issue proceduralized guidance by July 14, 1998, on developing PMTs which will address: (RC#2)
  - Applicable TSR surveillance tests;
  - QAP requirements;
  - The SS&Q audit recommendations.

MITIGATING FACTORS

- During the time that the autoclave was in operation with isolation valve FV-416X inoperable, there was a redundant manually operated valve (HV-386-4) that was closed and verified to be operable. Thus, this event was of low safety significance.

- Prompt and thorough corrective actions were initiated by USEC upon discovery of this event.

APPARENT VIOLATION 98005-07

Maintenance and Surveillance Activities

Associated with Air Operated Safety Valves on the Autoclaves

BACKGROUND

- On April 9, 1998, in response to a concern raised by the NRC Resident Inspector regarding the adequacy of containment valve surveillance testing, a functional check was performed on several autoclaves in the X-342 and X-343 facilities.

- The functional check involved valving off plant air and verifying that air operated containment valves still closed while simulating autoclave containment.

- Several containment valves failed to close as designed when the normal plant air supply was valved off.

- Other autoclave isolation valves with air-to-close actuators were subsequently tested (see Appendix).

- As of June 1, 1998:
  - 10 of the 13 autoclaves have been tested;
  - 55 of 73 total valves tested;
  - 15 valves failed testing criteria, but would still close on loss of air;
  - 9 valves failed to close on loss of air.

BACKGROUND (cont'd)

- The air-to-close valves in systems at ERP, LAW, Tails, and X-705 have been tested and found to operate as designed (11 valves).
- In January 1996, a similar issue was identified with the Parent Cylinder Safety Valves (PCSVs).
- Corrective actions for this previous event were narrowly focused on the PSCVs and were not extended to include other air-to-close valves.

ROOT CAUSE

- Failure to develop a testing program to demonstrate that autoclave air-to-close valves will perform their design function on a loss of normal supply air.

CORRECTIVE ACTIONS

Immediate Corrective Actions

- Affected autoclaves were declared inoperable.
- All safety-related systems with air-to-close valves were either declared inoperable (i.e., X-705 calciner) or an Operability Evaluation was performed (i.e., ERP, LAW, and Tails).
- Test criteria was established, the valves were tested and repaired as necessary, and the autoclaves returned to service.

CORRECTIVE ACTIONS (cont'd)

Additional Corrective Actions

- Issue formal testing criteria by June 17, 1998, for surveillance testing of the backup air reservoir tanks. Testing will be conducted via work packages. (RC)

- Testing of backup air reservoirs will be scheduled to be performed on a quarterly basis. This testing will be initiated on June 28, 1998.

- Revise the affected procedures by September 30, 1998, to include testing of the backup air reservoirs. (RC)

- An action plan will be developed by July 10, 1998, that verifies SAR design bases systems credited for backup are being properly tested. (RC)

MITIGATING FACTORS

- No impact on safety:
  - With normal plant air available, the containment system would have closed the valves.
  - With a loss of plant air, the autoclave automatically shuts down and containment is not required.
- No credit taken in TSR bases statements for closure of valves on loss of normal air.
- No design basis accident which takes credit for loss of air concurrent with a cylinder rupture in an autoclave.
- Prompt and thorough corrective actions were initiated by USEC upon discovery of this event.
- USEC does not believe that escalated enforcement action is warranted for this violation.

APPARENT VIOLATION 98005-08

Exceedance of Possession Limits

BACKGROUND

Highly Enriched Uranium (HEU) Suspension Activities (1992-1996)

- DOE program designed to remove as much HEU as practical from X-326.
- Included installed and uninstalled process equipment.
  - Cell treatment of installed equipment.
  - Over 650 individual components processed (compressors, convertors, coolers, pumps, traps, etc.).
- Included containerized nuclear materials (e.g., cylinders, polybottles, cans, drums).
- Suspension activities completed on September 26, 1996.

BACKGROUND (cont.)

Compliance Plan (CP) Issue A.4 Actions

- Required USEC to certify that materials remaining in X-326 following HEU Suspension would not exceed NRC Category III.
- CP required USEC to perform a static inventory of nuclear materials - completed.
- USEC letter to NRC, October 31, 1996, provided certification required by CP Issue A.4.
  - Certification based on inventory records;
  - Certification excluded:
    "Any other nuclear materials which may be discovered to be present in these areas as a result of legacy DOE operations, but which are not included on official nuclear material accounting records as described in Section 3.7 of the SAR."

BACKGROUND (cont.)

DOE X-326 Physical Security Sweep

- DOE program required prior to downgrading security in X-326.
- Comprehensive Non-Destructive Assay (NDA) scans of areas in X-326 were performed for DOE to identify any unknown HEU-bearing items.
- DOE approved Security Plan includes actions to be taken upon discovery of HEU materials.
- Sweep activities initiated October 1997.
- Sweep has found DOE HEU material which has been moved to a DOE Material Storage Area (DMSA).
- On April 6, 1998, 6 additional items discovered that contained a total of about 775g U-235 as HEU.

USEC ACTIONS

- Quantified HEU present in identified items.
- Material promptly transported to DOE's DMSA using approved procedures.
- Notified NRC Resident Inspector.
- X-326 Building protected at DOE Category I level.

JOINT STATEMENT OF UNDERSTANDING BETWEEN NRC AND DOE DECEMBER 20, 1993

"During the entire period that uranium enriched to 20 percent or more U^{235} is located at the Portsmouth facility, DOE will retain title to and possess such uranium and will be solely responsible for providing for, establishing and maintaining nuclear safety, safeguards and security controls applicable to such uranium."

CONCLUSIONS

- No safety and safeguards significance.
- All applicable procedures and requirements were met.
- USEC believes no violation of possession limits occurred.
- CP Issue A.4 does not clearly describe:
  - Limitations of HEU suspension activities.
  - Plans to conduct X-326 security sweep.
  - Actions to be taken upon discovery of HEU materials other than residual deposits.

PLANNED ACTIONS

- Complete security sweep of X-326 Building by September 30, 1998, to provide high degree of assurance that items containing uranium enriched above 10% have been identified.

- Promptly move any identified items to DMSAs in accordance with approved procedures.

APPENDIX

TEST RESULTS OF AIR-TO-CLOSE OPERATED VALVES

AIR-TO-CLOSE AS-FOUND TESTING DATA

X-342A

Valve Tested	Valve #	Test	X342-1	X-342-2
Blowdown	FV-_10X	loss of air	Failed	To be tested
		low air	Passed	To be tested
Conductivity A	FV-_11X1	loss of air	Passed	To be tested
		low air	Passed	To be tested
Conductivity B	FV-_11X2	loss of air	Passed	To be tested
		low air	Failed	To be tested
PCSV	FV-_04	low air	Failed	To be tested
Shell Vent	FV-_16X	low air	Passed	To be tested

X-343

Valve Tested	Valve #	Test	X-343-1	X-343-2	X-343-3	X-343-4	X-343-5	X-343-6	X-343-7
Blowdown	FV-_10X	loss of air	Failed	Failed	Valve closed **	Failed	Passed	Passed	To be tested
		low air	Not tested	Passed	Valve closed **	Passed	Passed	Passed	To be tested
Conductivity A	FV-_11X1	loss of air	Passed	Passed	Valve closed **	Passed	Passed	Failed	To be tested
		low air	Passed	Passed	Valve closed **	Passed	Passed	Failed	
Conductivity B	FV-_11X2	loss of air	Passed	Passed	Valve closed **	Passed	Passed	Passed	To be tested
		low air	Failed	Passed	Valve closed **	Passed	Passed	Passed	To be tested
PCSV	FV-_04	low air	Passed	Passed	Passed	Passed	Passed	Passed	To be tested
Shell Vent	FV-_16X	low air	Failed	Failed	Failed	Passed	Failed	Failed	To be tested

X-344

Valve Tested	Test	X-344-1		344-2		X-344-3		X-344-4	
Buffer Air Vent	loss of air	CV-125	Passed	CV-155	To be tested	FV-185	Failed	FV-235	To be tested
	low air		Passed		To be tested		Failed		
Blowdown Exhaust	loss of air	FSV-122	Failed	FSV-152	To be tested	FSV-182	Passed	FSV-232	Passed
	low air		Passed		To be tested		Passed		Failed
Blowdown Exhaust	loss of air	FSV-122X	Failed	FSV-152X	To be tested	FSV-182X	Passed	FSV-232X	Passed
	low air		Passed		To be tested		Passed		Failed
Condensate Drain	loss of air	PSV-106X	Passed	PSV-136X	To be tested	FSV-166	Passed	FSV-216	Passed
	low air		Passed		To be tested		Passed		Failed
Condensate Drain	loss of air	None	N/A	None	N/A	FSV-166X	Passed	FSV-216X	Passed
	low air						Passed		Failed
Vacuum Relief	loss of air	PCV-112X	Failed	PCV-142X	To be tested	FSV-196	Passed	FSV-246	Passed
	low air		Failed		To be tested		Passed		Failed
PCSV	low air	FV-115	Passed	FV-155	To be tested	FSV-191	Passed	FV-241	Failed
Shell Vent	low air	PCV-114X	Failed	PCV-144X	To be tested	None	N/A	None	N/A

Summary of As-Found Testing (6/1/98)

	X-342A	X-343	X-344A	Total
Valves Tested to Date	5	30	20	55
Successes***	2	20	9	31
Failures***	3	10	11	24
Total ATC Valves	10	36	28	73

** As-Found closure time not documented initially. Remaining packages document As-Found closure times and As-Left data documented in package.
*** Any valve failing either the "loss of air" or "low air" testing was classified as a Failure. Any valve not classified as a failure was considered a success.

Passed = Valve closes in less than 15 seconds.
Fails = Valve fails to close in less than 15 seconds, unless otherwise noted.

USEC
A Global Energy Company

The Open Line

LOCKHEED MARTIN

An update of business activities at the Portsmouth Gaseous Diffusion Plant

Our Vision: To be recognized as the production team that makes USEC the number one worldwide supplier of reliable, high quality, and low cost uranium enrichment services.

Tuesday, June 9, 1998

Stories for *The Open Line* should be mailed to MS 1225.

Straight Talk by Morris Brown

On Friday, June 5, several members of the USEC and Portsmouth plant management teams met with NRC representatives near Chicago to provide information regarding several apparent violations of our requirements. We discussed these major issues:

- Maintenance mechanics installed an autoclave isolation valve actuator upside down. Engineering did not identify adequate testing, and Operations did not observe that the valve did not operate correctly.
- Operations and Chemistry did not communicate adequately to prevent violating TSR requirements for handling a uranium deposit.
- Engineering, Operations and Maintenance did not communicate clearly resulting in inadequate testing of autoclave isolation valve control air systems.
- The plant potentially exceeded HEU possession limits. (Note that this will likely result in no violation).

Enforcement conferences provide the NRC additional information to determine if violations are significant enough to warrant civil penalty. Whether we receive a civil penalty or not, it is clear that all of the issues, with the exception of the one on HEU possession limits, resulted from less than high quality work. Managers and staff personnel spent days gathering information, determining causes and corrective actions, and packaging the data so the NRC could better understand the issues.

Even without civil penalties, the cost of enforcement conferences is high. Enforcement conferences divert management and employee attention from achieving other important work. We should be asking ourselves, "How can we prevent future enforcement conferences and potential civil penalties?" "How can we establish NRC confidence in the quality of our operations?" "How can we reduce costs and ensure our future success?"

Producing high quality work is the key to operational success at the Portsmouth plant. High quality work is achieved by following procedures and correcting or generating procedures if procedures are inadequate. High quality work is a result from establishing and maintaining clear communications with each other. High quality work is realized when work processes are thought through and then followed up to assure that the expected results are achieved.

Morris Brown

Lockout/Tagout update

1998 Self Study Guides are available through the Plant Training department. The Lockout/Tagout (LOTO) Self Study Guide (SSG) was developed as refresher training required for all LOTO Authorized Employees and LOTO Issuing Authorities. The SSG contains information from 1997 LOTO lessons learned. Copies can be obtained through your OTR (Organizational Training Representative), Technical Trainer, or by contacting Gwen Priode at ext.4742. (Linda Cole)

Game tickets available for June 11

Tickets are available to Lockheed Martin employees and their dependents for the Chillicothe Paints home baseball game against the Ohio Valley Redcoats on Thursday, June 11, at the VA Memorial Stadium in Chillicothe.

LMUS is sponsoring a "Children's Hospital Night" for this game. Children who were admitted to Children's Hospital during 1997-98 have been invited to participate in pre-game activities beginning at 6:30 p.m. at the stadium. A corporate contribution to Children's Hospital will be presented by Lockheed Martin during pre-game activities.

McDonalds will also be distributing souvenir cups to the first 500 people in the park.

The Chillicothe Paints provided approximately 100 tickets free of charge for our use during this night. Expenses incurred as a result of attending the game are the responsibility of the ticket holders. Tickets for the June 11 game are available on a first-come, first-served basis and will be distributed in groups of four. Game time is 7:05 p.m. Contact Barb Bowling, Public Affairs, on ext. 2863. Tickets must be picked up no later than NOON on June 11. (Bryant Lybrook)

Blood drive scheduled

The Bloodmobile will be at the plant on June 18 from 11 a.m.-5 p.m. and again on June 19 from 7 a.m.-1 p.m. in the X-102 Cafeteria. To register for an appointment, please call Barbara Bowling at ext. 2863. Walk-ins are welcome.

LMUS Ethics Officer
Ron Wetherell
897-2006
Corporation: 1-800LMETHIC

The Chillicothe Gazette
June 3, 1998
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Commission to meet with A-plant officials

The Nuclear Regulatory Commission will meet Friday with United States Enrichment Corporation for a pre-decisional enforcement conference on apparent violations at the Piketon uranium enrichment plant.

Topics for discussion will be the corporation's failure to control components with uranium deposits, inadequate maintenance, testing and operation of safety valves on equipment and exceeding the possession limit of some enriched uranium.

Commission officials said such a conference does not mean a violation has occurred or enforcement action will take place. Rather, the purpose is to discuss apparent violations, their causes and safety significance.

Any enforcement action would take place at a later date, officials said.

(c, 6/3, 3A)