

January 27, 2000

MEMORANDUM TO: Frank Congel, Director  
Incident Response Division

FROM: Michael F. Weber, Director /RA by Robert C. Pierson Acting For/  
Division of Fuel Cycle Safety  
and Safeguards

SUBJECT: REVISION OF RTM-96 AND RCM-96

In response to your memorandum of January 6, 2000, I am designating William Troskoski, in our Operations Branch, to serve as our technical point of contact for FCSS on issues involving incident response. Mr. Troskoski can be reached at 415-8076 (E-mail: WMT).

In addition, we have the following comments on RTM-96 and RCM-96:

1. Staff anticipates receiving a license application for a Mixed Oxide (MOX) fuel fabrication facility in the foreseeable future. There may be chemical, criticality, radiological, fire, and environmental issues associated with this facility, not already covered in RTM-96 or RCM-96, and which will require appropriate additions to these documents, based upon appropriate analyses.
2. The following specific changes to RTM-96 are suggested:
  - a. Include a new section for fuel cycle in RTM-96, to include the type of accident that occurred at Tokaimura, Japan. (This is the most likely safety-significant accident that could occur at fuel facilities, not involving UF6.)
  - b. Section B - The emergency classification levels for fuel cycle facilities are different from the ones for reactors. It is important to identify the differences, especially in terms of definition and assessment methods.
  - c. Section E - This section needs revision to reflect current methods for UF6 release assessment.
  - d. Sections F, G, and H - Should we consider the potential chemical dose as the result of a radiological event?
  - e. Section P - Revise this section, as appropriate, on classification, UF6 release assessment, etc.

- f. Section Q - As in Section B, we need to be sensitive to some differences between fuel cycle facilities and reactors; especially, regarding the different definitions of emergency classification levels.
  - g. Do we want to include in the RTM the use of other technical tools, such as ALOHA, for evaluating chemical releases?
3. The following specific changes are suggested for RCM-96:
- a. Section Q - It seems that this section only discusses the concept of operations for reactors. If the concept of operations for fuel cycle facilities and material licensees is similar, it should note that it is so. In addition, the definitions of emergency classification levels are different between fuel cycle facilities and reactors.
  - b. Section U is for responding to a chemical accident not involving radioactive materials. Should we also address responding to a chemical release involving radiological materials, such as notification, coordination, etc.?

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