

## Response to Comments - Chapter 6 - Chemical Process Safety

Comment No.	Source	Comment	Disposition
6.1	NEI	“...Chapter 6.0 requires clarification and editing to be consistent with modifications made to 10 CFR Part 70.”	Agree. Changes will be made to maintain consistency with language in 10 CFR Part 70.
6.2	NEI	“...There are confusing and inconsistent references to the ISA and ISA Summary. The review must consistently state that the chemical safety review will address the accident sequences described in the ISA Summary. The inconsistent use of terms must be clarified and the contents of the ISA Summary must be clearly defined in 10 CFR Part 70.65.”	<p>Agree in part. Inconsistent references to ISA and ISA Summary will be corrected.</p> <p>However, chemical process safety reviews will consider ISA Summary and other ISA documentation as needed to determine that safety is being provided.</p>
6.3	NEI	“10 CFR Part 70.62(a) permits but no longer mandates, use of a graded approach to safety. Language in the SRP (6.5.2.2, paragraph 2) still indicates that grading is required and that the reviewer must assess the grading method. This inconsistency between the rule and the SRP must be corrected.”	Agree. The use of graded approach to safety is not mandatory and the paragraph will be revised as needed.

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6.4(a)	NEI	(a) Several inconsistencies between the SRP and Rule remain. For example, the draft SRP requires adherence to baseline design criteria for "...new facilities or new processes.... (6.3(8)) or for " new facilities or new processes at existing facilities..." (6.4.3.3). To comply with 10 CFR 70.64(a), the correct requirement should read "... new facilities or new processes at existing facilities that require a license amendment under 70.72..."	Agree. Revision described by NEI will be done.
6.4(b)		(b) The requirement of 6.3, Item 2 for a " quantitative interpretation of the qualitative chemical risk levels..." is obscure and may prompt confusion on behalf of the reviewer. The NRC has previously stated on numerous occasions that use of quantitative analysis (such as Probabilistic Risk Analysis) is inappropriate for fuel cycle facilities. The quantitative interpretation required in 6.3 should not, therefore, be sought.	Agree in part. The NRC is not requiring a Probabilistic Risk Analysis. However, the level of risk and how it is determined or ranked is pertinent to the safety review.
6.5	NEI	In several sections of Chapter 6, NEI has adopted language from the draft SRP for the AVLIS facility where such language is more clearly and succinctly expressed than in draft NUREG 1520	Agree. Language used in AVLIS, MOX and Part 70 SRP's will be reviewed to provide consistency and clarity.
6.6	NEI	Specific comments provided in a redline/strikeout version of chapter 6.0	Specific comments will be considered and revised as necessary to address NEI's General Comments provided above.