



DUKE COGEMA
STONE & WEBSTER

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U.S. Nuclear Regulatory Commission
Washington, DC 20555

29 June 2001
DCS-NRC-000051
Response Requested: *No*

Subject: Docket Number 070-03098
Duke Cogema Stone & Webster
Mixed Oxide Fuel Fabrication Facility
Additional Site Explorations

During Summer 2001, Duke Cogema Stone & Webster (DCS) will conduct a series of confirmatory geotechnical explorations at the Mixed Oxide (MOX) Fuel Fabrication Facility (MFFF) site to provide additional engineering information about the subsurface conditions near structures that are anticipated to be items relied on for safety (IROFS). Safe conduct of these explorations will require grading roadways to provide equipment access to the study areas, and preparing the study areas for equipment access.

DCS believes the geotechnical exploration program it conducted in 2000, in support of the Construction Authorization Request (CAR) submittal, was, and still is, appropriate and adequate for the intended purpose of demonstrating the acceptability of the selected site. The original site investigation activities are described in CAR Section 1.3.5.2 and Figure 1.3.5-22. However, additional geotechnical explorations are necessary for completion of the final foundation design required to support the License Application submittal planned for June 2002.

The pre-existing spoils pile on the site (resulting from excavation for DOE's Actinide Packaging and Storage Facility, or APSF) prevented some areas from being investigated as fully as would have been preferred in the original exploration program, notably on the slopes of the spoils pile. To ensure completeness of engineering information, DCS will perform additional confirmatory explorations in the area planned for the MOX Fuel Fabrication and Emergency Diesel Generator Buildings, presently covered by the APSF spoils pile. These confirmatory explorations will provide more closely spaced data beneath and near the boundaries of the anticipated IROFS structures to further demonstrate the adequacy of foundation conditions. The enclosed figure describes the scope of the planned confirmatory explorations and the required access roadways.

These activities do not constitute "commencement of construction." The NRC's regulations at 10 CFR 70.23(a)(7) specifically state that "the term 'commencement of construction'...does not mean site exploration, roads necessary for site exploration, [or] borings to determine foundation conditions." Additionally, 10 CFR 51.101(c) states that the limitations on actions section of the regulation "[do] not preclude any applicant...after prior notice and consultation with the NRC

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staff...from performing any physical work necessary to support an application." Accordingly, the regulations clearly allow these activities to be performed at this time.

The purpose of this letter is to follow up on our 21 June 2001 consultation with your staff on this subject and to formally provide prior notice of DCS' plans to perform these activities at the MFFF site. If you have any questions, please contact me at (704) 373-7820 or John McConaghy at (704) 382-3021.

Sincerely,



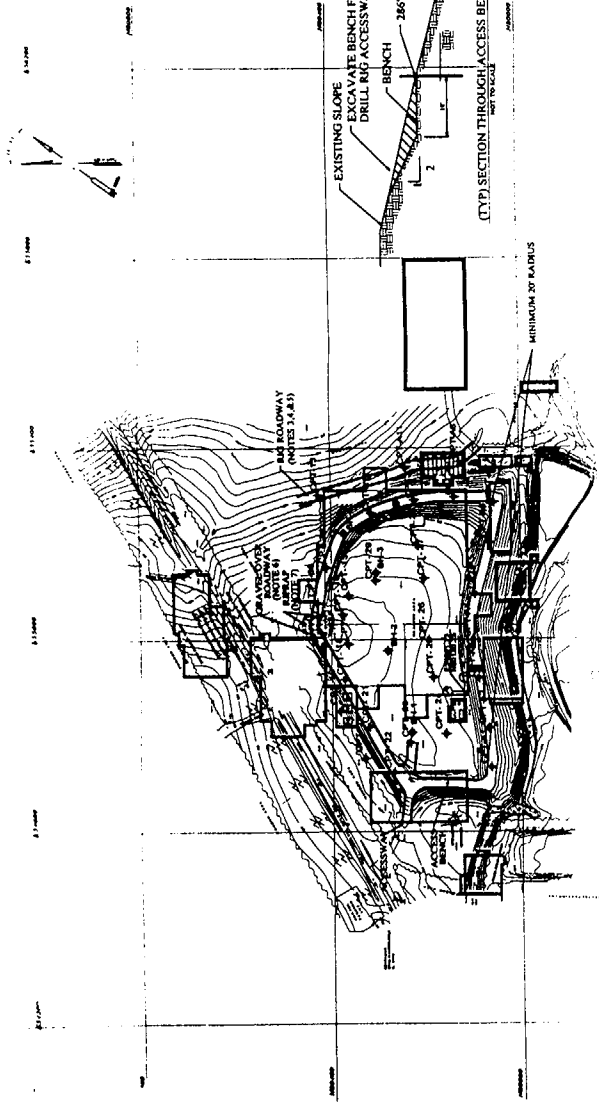
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Licensing Manager

Enclosure: Confirmatory Exploration Figure

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PRA/EDMS: Corresp\Outgoing\NRC\Licensing\DCS-NRC-000051

BENCH LOCATION		CONE PENETROMETER LOCATION	
SP	COORDINATE	SP	COORDINATE
8-1	80235.11	CTP-1.1	80070.28
8-2	80236.22	CTP-1.2	80071.39
8-3	80237.33	CTP-1.3	80072.50
8-4	80238.44	CTP-1.4	80073.61
8-5	80239.55	CTP-1.5	80074.72
8-6	80240.66	CTP-1.6	80075.83
8-7	80241.77	CTP-1.7	80076.94
8-8	80242.88	CTP-1.8	80078.05
8-9	80243.99	CTP-1.9	80079.16
8-10	80245.10	CTP-1.10	80080.27
8-11	80246.21	CTP-1.11	80081.38
8-12	80247.32	CTP-1.12	80082.49
8-13	80248.43	CTP-1.13	80083.60
8-14	80249.54	CTP-1.14	80084.71
8-15	80250.65	CTP-1.15	80085.82
8-16	80251.76	CTP-1.16	80086.93
8-17	80252.87	CTP-1.17	80088.04
8-18	80253.98	CTP-1.18	80089.15
8-19	80255.09	CTP-1.19	80090.26
8-20	80256.20	CTP-1.20	80091.37
8-21	80257.31	CTP-1.21	80092.48
8-22	80258.42	CTP-1.22	80093.59
8-23	80259.53	CTP-1.23	80094.70
8-24	80260.64	CTP-1.24	80095.81
8-25	80261.75	CTP-1.25	80096.92
8-26	80262.86	CTP-1.26	80098.03
8-27	80263.97	CTP-1.27	80099.14
8-28	80265.08	CTP-1.28	80100.25
8-29	80266.19	CTP-1.29	80101.36
8-30	80267.30	CTP-1.30	80102.47
8-31	80268.41	CTP-1.31	80103.58
8-32	80269.52	CTP-1.32	80104.69
8-33	80270.63	CTP-1.33	80105.80
8-34	80271.74	CTP-1.34	80106.91
8-35	80272.85	CTP-1.35	80108.02
8-36	80273.96	CTP-1.36	80109.13
8-37	80275.07	CTP-1.37	80110.24
8-38	80276.18	CTP-1.38	80111.35
8-39	80277.29	CTP-1.39	80112.46
8-40	80278.40	CTP-1.40	80113.57
8-41	80279.51	CTP-1.41	80114.68
8-42	80280.62	CTP-1.42	80115.79
8-43	80281.73	CTP-1.43	80116.90
8-44	80282.84	CTP-1.44	80118.01
8-45	80283.95	CTP-1.45	80119.12
8-46	80285.06	CTP-1.46	80120.23
8-47	80286.17	CTP-1.47	80121.34
8-48	80287.28	CTP-1.48	80122.45
8-49	80288.39	CTP-1.49	80123.56
8-50	80289.50	CTP-1.50	80124.67



(TYP) SECTION THROUGH ACCESS BENCH

- LEGEND:
 RIPRAP
 GRAVEL
 CONE PENETROMETER LOCATION
 BORISHOLE LOCATION
 BUILDING OUTLINES

- NOTES:
 1 EXCAVATE BENCH ON EXISTING SLOPE TO PROVIDE ACCESS FOR DRILL RIG TO EXISTING BENCH.
 2 EXCAVATED MATERIAL MAY BE PLACED ON TOP OF SPILLS TO BE MAINTAINED UNTIL NEW EXPLORATION POINTS ARE MAINTAINED.
 3 EXCAVATED MATERIAL TO BE PLACED ON EXISTING ROADWAY TO PROVIDE ACCESS TO NEW EXPLORATION POINTS.
 4 GRADE TO MAINTAIN DRAINAGE.
 5 PLACE RIPRAP TO PROTECT BENCH FROM EROSION ABOVE AND BELOW THE BENCH.

MFFF PROPOSED EXPLORATION PROGRAM 2001
 FIGURE 1