



DUKE COGEMA
STONE & WEBSTER

Document Control Desk
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,



Peter S. Hastings, P.E.

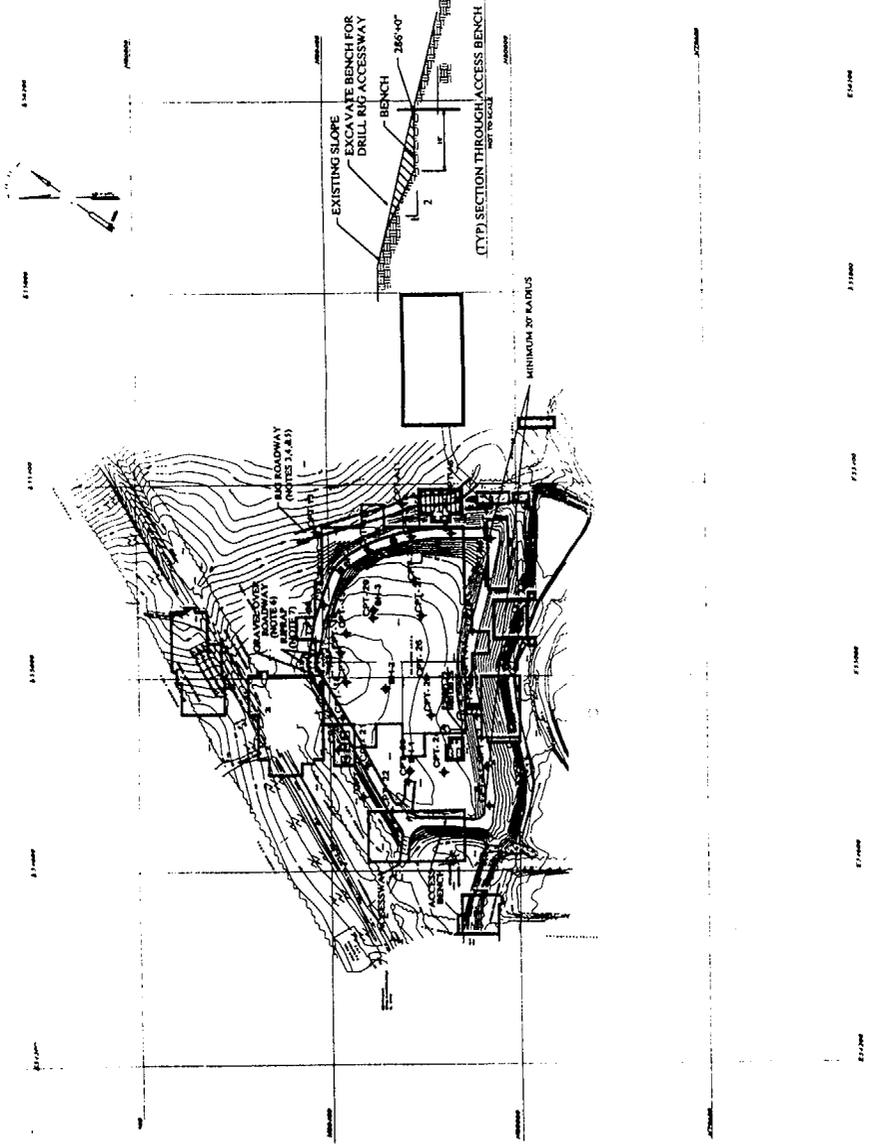
Licensing Manager

Enclosure: Confirmatory Exploration Figure

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BENCH LOCATION		CONE PENETROMETER LOCATION	
SP	COORDINATE	CONO	DEPTH
B-1	80177.26	CTF-A-1	80010.08
B-2	80177.26	CTF-A-2	80010.08
B-3	80177.26	CTF-A-3	80010.08
B-4	80177.26	CTF-A-4	80010.08
B-5	80177.26	CTF-A-5	80010.08
B-6	80177.26	CTF-A-6	80010.08
B-7	80177.26	CTF-A-7	80010.08
B-8	80177.26	CTF-A-8	80010.08
B-9	80177.26	CTF-A-9	80010.08
B-10	80177.26	CTF-A-10	80010.08
B-11	80177.26	CTF-A-11	80010.08
B-12	80177.26	CTF-A-12	80010.08
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B-14	80177.26	CTF-A-14	80010.08
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B-16	80177.26	CTF-A-16	80010.08
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B-18	80177.26	CTF-A-18	80010.08
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B-20	80177.26	CTF-A-20	80010.08
B-21	80177.26	CTF-A-21	80010.08
B-22	80177.26	CTF-A-22	80010.08
B-23	80177.26	CTF-A-23	80010.08
B-24	80177.26	CTF-A-24	80010.08
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B-71	80177.26	CTF-A-71	80010.08
B-72	80177.26	CTF-A-72	80010.08
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B-80	80177.26	CTF-A-80	80010.08
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B-82	80177.26	CTF-A-82	80010.08
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B-84	80177.26	CTF-A-84	80010.08
B-85	80177.26	CTF-A-85	80010.08
B-86	80177.26	CTF-A-86	80010.08
B-87	80177.26	CTF-A-87	80010.08
B-88	80177.26	CTF-A-88	80010.08
B-89	80177.26	CTF-A-89	80010.08
B-90	80177.26	CTF-A-90	80010.08
B-91	80177.26	CTF-A-91	80010.08
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B-96	80177.26	CTF-A-96	80010.08
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B-98	80177.26	CTF-A-98	80010.08
B-99	80177.26	CTF-A-99	80010.08
B-100	80177.26	CTF-A-100	80010.08

BENCH LOCATION		CONE PENETROMETER LOCATION	
SP	COORDINATE	CONO	DEPTH
B-101	80177.26	CTF-A-101	80010.08
B-102	80177.26	CTF-A-102	80010.08
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B-105	80177.26	CTF-A-105	80010.08
B-106	80177.26	CTF-A-106	80010.08
B-107	80177.26	CTF-A-107	80010.08
B-108	80177.26	CTF-A-108	80010.08
B-109	80177.26	CTF-A-109	80010.08
B-110	80177.26	CTF-A-110	80010.08
B-111	80177.26	CTF-A-111	80010.08
B-112	80177.26	CTF-A-112	80010.08
B-113	80177.26	CTF-A-113	80010.08
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B-115	80177.26	CTF-A-115	80010.08
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B-117	80177.26	CTF-A-117	80010.08
B-118	80177.26	CTF-A-118	80010.08
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B-157	80177.26	CTF-A-157	80010.08
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B-177	80177.26	CTF-A-177	80010.08
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B-197	80177.26	CTF-A-197	80010.08
B-198	80177.26	CTF-A-198	80010.08
B-199	80177.26	CTF-A-199	80010.08
B-200	80177.26	CTF-A-200	80010.08



MFTF PROPOSED EXPLORATION PROGRAM 2001
FIGURE 1

- LEGEND:**
 RIPRAIP
 GRAVEL
 CONE PENETROMETER LOCATION
 BORINGHOLE LOCATION
 BUILDING OUTLINES
- NOTES:**
 1. EXCAVATE BENCH ON EXISTING SLOPE TO PROVIDE ACCESS FOR DRILL RIG ACCESSWAY.
 2. EXCAVATED MATERIAL MAY BE PLACED ON TOP OF SPOILS TO PROVIDE ACCESS TO NEW EXPLORATION POINTS.
 3. EXCAVATED MATERIALS TO BE MAINTAINED.
 4. EXCAVATED MATERIALS TO BE MAINTAINED.
 5. GRADE TO MAINTAIN DRAINAGE.
 6. ADD GRAVEL TO BENCH TO PREVENT EROSION.
 7. EXTEND RIPRAIP TO PROTECT EXCAVATED BENCH ABOVE AND BELOW THE BENCH.