

70-143



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AIRBORNE EXPRESS

21G-03-0086  
GOV-01-55-04  
ACF-03-0116

March 21, 2003

Director  
Office of Nuclear Material Safety and Safeguards  
U.S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, DC 20555

- References:
- 1) Docket No. 70-143; SNM License 124
  - 2) Letter from B. M. Moore to NRC, License Amendment Request to Support the Uranyl Nitrate Building at the BLEU Complex, dated February 28, 2002 (21G-02-0051)
  - 3) Letter from B. M. Moore to NRC, Additional Information to Support NRC Review of the NCSE and the ISA Summary for the UNB, dated March 7, 2003 (21G-03-0064)

**Subject: QA Oversight Commitments**

Dear Sir:

Nuclear Fuel Services, Inc. (NFS) hereby submits information (attachment) to docket commitments regarding quality assurance oversight that will be performed by NFS at the Department of Energy's Savannah River Site located in Aiken, South Carolina. The information contained herein reflects discussions with your staff on March 7, 2003 and March 12, 2003. These commitments support licensing actions at the Uranyl Nitrate Building for the BLEU Project.

NMSS01

If you or your staff have any questions, require additional information, or wish to discuss this, please contact me, or Mr. Rik Droke, Licensing and Compliance Director at (423) 743-1741. Please reference our unique document identification number (21G-03-0086) in any correspondence concerning this letter.

Sincerely,

**NUCLEAR FUEL SERVICES, INC.**



B. Marie Moore  
Vice President  
Safety and Regulatory

Attachment

JSK/lsn

cc:

Regional Administrator  
U.S. Nuclear Regulatory Commission  
Region II  
Atlanta Federal Center  
61 Forsyth Street, SW  
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Mr. William Gloersen  
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Mr. Daniel Rich  
Senior Resident Inspector  
U.S. Nuclear Regulatory Commission

B.M. Moore to Dir., NMSS  
Page 3  
March 21, 2003

21G-03-0086  
GOV-01-55-04  
ACF-03-0116

## **Attachment**

(2 pages to follow)

On March 7, 2003, a conference call was held between NFS (Randy Shackelford, Barry Griffith, and Wade Tilson) and the NRC (Wil Smith) to discuss quality assurance (QA) oversight of Savannah River Site (SRS) activities relating to the generation of Low-Enriched Uranyl Nitrate (LEUN) solution and packaging of the solution into authorized shipping containers for subsequent shipment to the NFS site.

During a conference call on March 12, 2003 between NFS (Randy Shackelford, Wade Tilson, Richard Montgomery, Marie Moore, Neil Newman, Pat Koppel, and Rik Droke) and the NRC (Mary Adams, Sheena Whaley, and Margaret Chatterton) regarding additional nuclear criticality safety (NCS) questions, the NRC requested that NFS provide (to the NRC) commitments made to the NRC during the March 7, 2003 conference call relating to QA oversight of SRS activities. In addition, during the March 12, 2003 conference call, the NRC requested that NFS supply (to the NRC) the essence of the QA/audit agreement between NFS and SRS.

Commitments made during the March 7, 2003 conference call are as follows:

1. Audits coordinated and performed by the NFS QA Department

The audits of SRS activities will be coordinated and performed by the NFS Quality Assurance Department with relevant subject matter experts as necessary (e.g., NCS specialist).

2. Audits performed in accordance with internal NFS audit plan

The audits of the SRS activities will be performed in accordance with an NFS internally approved audit plan (Reference Quality Assurance Department Procedure NFS-Q-217, Revision 0, *Quality Assurance Audit Plan for Sampling, Testing, and Loading Blended Low Enriched Uranium at Savannah River Site*).

3. Periodic audits

An initial audit will be performed by NFS of relevant SRS activities prior to loading the first shipment of LEUN. Audits will be performed on a 6-month frequency until it is determined that a lesser frequency is adequate.

4. Vehicle to formalize QA/audit agreement between NFS and SRS

Contractual requirements exist to allow NFS to audit SRS processes and procedures used to satisfy the sampling and quality assurance plan (Reference Paragraph C of Article IX of Interagency Agreement No. DE-SA09-01SR18976). In addition, an additional interagency agreement (Reference Interface/Issue Control Form No. HEU 2004-006) has been put in place to specify the following:

SRS shall implement a quality assurance program during the sampling, testing, and loading of low enriched material to be shipped to the BLEU Complex for storage and processing. This quality assurance program shall have, as a minimum, the eighteen criteria specified in ASME NQA-1.

NFS shall perform the initial audit of the operation and testing facilities and subsequent periodic audits to provide assurance that operations are being conducted adequately as related to nuclear criticality safety. NFS shall write and maintain the audit plan with full concurrence of SRS. SRS' quality assurance plan, sampling procedures, test procedures, and loading procedures shall be forwarded to NFS for information to prepare for the audits.

NFS shall use the NFS document titled, *Quality Assurance Audit Plan for Sampling, Testing, and Loading Blended Low Enriched Uranium at Savannah River Site*, NFS-Q-217, to accomplish the audit and satisfy the relevant requirements for the BLEU Complex.