From: "Kirk, J. Scott" <JSKirk@nuclearfuelservices.com>
To: "Mary Adams (E-mail)" <mta@nrc.gov>, "Fred Burrows (E-mail)" <fhb@nrc.gov>
Date: 4/22/03 5:08PM
Subject: Management Measures

Mary -

As we discussed today and as a follow-up to our meeting last week, NFS' NCSE (Rev. 2, dated March 10th) includes revisions to the descriptions of IROFS. Applicable IROFS listed as "Administrative Controls" in the ISA Summary (dated August 2002) have since been reclassified as "Enhanced Administrative Controls" to provide consistency with the IROFS descriptions cited in the referenced NCSE . An example of this revision is illustrated in the referenced NCSE (see page 21, Section 4.7, Cases 15, 16, and 19, Contingency #1) that addresses an air flow monitor and the operator action required to respond to any subsequent alarm. Another example is also described in this same section (see contingency #2) related to the operator action and a density monitor.

NFS will apply management measures to the operator action and the equipment to ensure that both of these controls are maintained reliable as listed Table 2.2 under "Enhanced Administrative Controls". These management measures include training and qualification of the operator and functional testing of the equipment. Since the management measures for "Enhanced Administrative Controls" currently listed in Table 2.2 address both the operator and equipment components comprising the IROFS, no further changes to Table 2.2 are necessary. Again, these management measures are the minimum requirements that will be applied to IROFS.

In addition, NFS has committed to revise the ISA Summary to reflect updates to the NCSE (such as revising descriptions of IROFS listed as "Administrative Controls"). These documents will be ready for your review as part of the Readiness Assessment scheduled for the week of May 12th. To my understanding, these clarifications should resolve any outstanding issues related to Table 2.2.

I hope this helps address the questions raised by Fred last week. Please call me if you have any questions.

Scott

CC: "Droke, Rik P." <RPDroke@nuclearfuelservices.com>

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