

July 28, 2004

MEMORANDUM TO: Joseph G. Giitter, Chief  
Special Projects Branch  
Division of Fuel Cycle Safety  
and Safeguards

THRU: Brian W. Smith, Chief /RA/  
Gas Centrifuge Facility Licensing Section  
Special Projects Branch, FCSS

FROM: Timothy C. Johnson /RA/  
Senior Mechanical Systems Engineer  
Gas Centrifuge Facility Licensing Section  
Special Projects Branch, FCSS

SUBJECT: JUNE 29, 2004, TELEPHONE SUMMARY: LOUISIANA  
ENERGY SERVICES REQUESTS FOR ADDITIONAL  
INFORMATION

On June 29, 2004, U.S. Nuclear Regulatory Commission (NRC) staff held a telephone conference call with staff from Louisiana Energy Services (LES) to discuss the LES responses to requests for additional information in the areas of human factors engineering and the integrated safety assessment. I am attaching the telephone summary for your use. The summary contains no proprietary or classified information.

Docket: 70-3103

Attachment: Louisiana Energy Services  
Telephone Summary

cc:	William Szymanski/DOE	Claydean Claiborne/Jal	Rod Krich/LES
	Monty Newman/Hobbs	James Curtiss/W&S	Troy Harris/Lovington
	Peter Miner/USEC	Betty Richman/Tatum	James Ferland/LES
	Glen Hackler/Andrews	Dennis Holmberg/Lea Cty	William Floyd/NMED
	James Brown/Eunice	Richard Ratliff/Texas	M. Marriotte/NIRS
	Jerry Clift/Hartsville	CO'Claire/Ohio	Lee Cheney/CNIC
	Derrith Watchman-Moore/NMED	Joseph Malherek/PC	Ron Curry/NMED
	Clay Clarke/NMED	Patricia Madrid/NMAG	Glenn Smith/NMAG
	Lindsay Lovejoy/NIRS		

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## **Telephone Conference Call Summary**

### **Human Factors Engineering**

Date and Time: 2:00 PM; June 29, 2004

Call Participants:	J. Kramer/NRC	W. Troskowski/NRC
	B. Smith/NRC	N. Garcia-Santos/NRC
	T.C. Johnson/NRC	R. Krich/LES
	D. Green/LES	J. Snooks/LES
	D. Pepe/LES	G. Harper/LES
	D. Williamson/LES	

During the conference call, staff discussed the Louisiana Energy Services (LES) Request for Additional Information (RAI) responses related to human factors engineering. In ISA-14, U.S. Nuclear Regulatory Commission (NRC) staff requested information on the approach used for considering human factors in the plant design. In the conference call, NRC staff requested information on any guidelines or standards used. LES staff indicated that it used proprietary Urenco internal guidelines that are not considered to be formal international standards. LES staff agreed to determine if these guidelines could be released by Urenco or if they can be summarized to present the human factors approach used in the design.

With respect to the Criticality Alarm Annunciation System (CAAS), LES staff indicated that it is not considered an IROFS because the LES approach to criticality safety is to prevent criticalities. In addition, no CAAS operator actions are required. Based on this discussion, NRC staff had no further questions on the CAAS.

In ISA-42, related to sole IROFS, LES staff indicated that the sole IROFS listed for criticality safety were collections of several individual administrative actions and that these individual actions would be broken out separately in the revised Safety Analysis Report. In the chemical safety area, there are several sole IROFS, including one related to administrative controls. NRC asked about the basis for the probability index number on -2 used in the contingency dump trap removal in IROFS23. LES indicated that the use of respirators would be required for this operation, which would be a planned, routine operation. LES stated that the probability index is consistent with the guidance in NUREG-1520, "Standard Review Plan for the Review of a License Application for a Fuel Cycle Facility," Table A-10. NRC staff had no further questions on this RAI response.

Regarding ISA-62, NRC staff asked for the basis for the probability index values for administrative IROFS that are not Class A IROFS. LES indicated that the basis is from NUREG-1520. NRC staff had no further questions.

## **Telephone Conference Call Summary**

### **Integrated Safety Assessment**

Date and Time: 2:30 PM; June 29, 2004

Call Participants:	J. Kramer/NRC	W. Troskowski/NRC
	B. Smith/NRC	N. Garcia-Santos/NRC
	T.C. Johnson/NRC	R. Krich/LES
	D. Green/LES	J. Snooks/LES
	D. Pepe/LES	G. Harper/LES
	D. Williamson/LES	

LES staff began the conference call with a discussion of the basis for the Acute Exposure Guideline (AEG) levels used in the Integrated Safety Analyses pertaining to chemical exposures. The AEGs referenced in the Safety Analysis Report (SAR) were based on draft guidance from the National Academy of Science. Shortly, after the application was submitted to NRC, final AEGs were published. LES staff indicated that the new AEGs would be used in the SAR revision and appropriate changes would be made to Tables 3.6-5 and 6.3-3. LES staff also indicated that a 2.5 minute exposure limit would also be added to account for a seismic scenario involving worker evacuation within a 2.5 minute timeframe. The above approach was acceptable to NRC staff.

For ISA-34, LES staff indicated that based on the AEG changes, changes to building leakage value limits would occur. This information would be updated in the revised SAR.

In ISA-13, two different seismic standards are referenced. NRC staff asked which of the standards would be used or, if both are to be used, are the standards consistent? LES indicated that only one of the standards will be used.

In ISA-1, LES indicated that it did not plan to provide a separate ISA summary from the application. NRC staff indicated that it prefers a separate ISA summary to minimize the need for future amendment actions in the event that the ISA summary is changed. It was agreed to discuss this issue further in the discussion scheduled for criticality issues.