July 29, 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: JULY 26, 2004, TELEPHONE SUMMARY: LOUISIANA ENERGY SERVICES REQUESTS FOR ADDITIONAL INFORMATION

On July 26, 2004, U.S. Nuclear Regulatory Commission (NRC) staff held a telephone conference call with staff from Louisiana Energy Services (LES) to discuss criticality safety and the Integrated Safety Analysis summary issues. 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
Monty Newman/Hobbs
Peter Miner/USEC
Glen Hackler/Andrews
James Brown/Eunice
Jerry Clift/Hartsville
Derrith Watchman-Moore/NMED
Clay Clarke/NMED
Lindsay Lovejoy/NIRS
Claydean Claiborne/Jal
James Curtiss/W&S
Betty Richman/Tatum
Dennis Holmberg/Lea Cty
Richard Ratliff/Texas
CO'Claire/Ohio
Joseph Malherek/PC
Patricia Madrid/NMAG
Rod Krich/LES
Troy Harris/Lovington
James Ferland/LES
William Floyd/NMED
M. Marriotte/NIRS
Lee Cheney/CNIC
Ron Curry/NMED
Glenn Smith/NMAG

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DAyres/Reg II	DSeymour/RegII	JHenson/RegII	RHannah/RegII
KClark/RegII	KO'Brien/Reg III	VMitlyng/RegIII	DHartland/Reg II
WMaier/RegIV	Hearing file		
LES website - No			

ML

OFC	GCFLS		GCFLS		GCFLS	
NAME	TCJohnson		LMarshall		BSmith	
DATE	07/28/04		07/29 /04		07/ 29/04	

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Telephone Conference Call Summary

Criticality Safety and Integrated Safety Analysis

Date and Time: 4:00 PM; July 26, 2004

Call Participants:		
	H. Felsher/NRC	B. Smith/NRC
	T.C. Johnson/NRC	G. Harper/Areva
	R. Krich/LES	D. Pepe/Areva
	D. Green/LES	B. Hubbard/LES
	B. Roberts/Areva	R. Turcotte/LES

During the conference call, the U.S. Nuclear Regulatory Commission (NRC) staff discussed the Louisiana Energy Services (LES) proposal to modify the accident sequences for criticality safety for the Integrated Safety Analysis (ISA) summary.

In the discussion, NRC staff stated that it considers criticality accidents involving loss of favorable geometry to be credible. Therefore, NRC staff would expect to see them addressed in the ISA summary as separate accident sequences. Based on the NRC staff review of the LES application, the favorable geometry components or systems would need to be identified as items relied on for safety (IROFS). The IROFS identification could be done on either a component or system basis. Because criticality is considered a high consequence event, LES would need to show that these accident sequences are "highly unlikely."

Another alternative would be to demonstrate that the loss of favorable geometry would be "highly unlikely," if adequate justification is provided. Under the current definition LES is using for "highly unlikely," this demonstration would be difficult. However, a new definition could be proposed to address favorable geometry components or systems, if LES can demonstrate by analysis that large margins of safety exist and the overall hazard of the facility is low. In addition, tables showing initiating events could be revised to add a frequency of 10^{-5} with a basis for favorable geometry components or systems that reflect the new definition of "highly unlikely" and information in the previously proposed justification for "not credible." Under this approach, it may not be necessary to identify these favorable geometry components and systems as IROFS. If not designated as IROFS, a basis would need to be provided to support a continued justification for meeting the definition of "highly unlikely." For example, management measures could be applied to ensure configuration control and that the safety basis would be maintained. NRC staff would also need information on the estimated amounts of uranium in the applicable components and systems to review the basis for stating that there are high margins of safety. LES staff indicated that they understand these options and would consider them in making revisions to the Safety Analysis Report.

NRC staff also indicated that, if LES chooses to identify the favorable geometry components or systems as IROFS, then it will need to clarify that the IROFS are the components or systems themselves and not the "design of" or "use of" the components or systems. LES staff indicated that they understood this clarification and that they would make the above changes.

NRC staff stated that, in reference to Request for Additional Information comment ISA-58, the intent of the comment was not to prohibit the use of enhanced administrative controls as IROFS, but rather that a definition and examples would be needed in the ISA summary, if they are to be used. LES staff agreed with this statement.