NATIONAL ENRICHMENT FACILITY

10 CFR 30.6
10 CFR 40.5
10 CFR 70.5

August 4, 2004

NEF#04-034

ATTN: Document Control Desk
Director
Office of Nuclear Material Safety and Safeguards
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Louisiana Energy Services, L. P.
National Enrichment Facility
NRC Docket No. 70-3103

Subject: Configuration Management Procedure

References:

1. Letter NEF#03-003 dated December 12, 2003, from E. J. Ferland (Louisiana Energy Services, L. P.) to Directors, Office of Nuclear Material Safety and Safeguards and the Division of Facilities and Security (NRC) regarding "Applications for a Material License Under 10 CFR 70, Domestic licensing of special nuclear material, 10 CFR 40, Domestic licensing of source material, and 10 CFR 30, Rules of general applicability to domestic licensing of byproduct material, and for a Facility Clearance Under 10 CFR 95, Facility security clearance and safeguarding of national security information and restricted data"

2. Letter NEF#04-002 dated February 27, 2004, from R. M. Krich (Louisiana Energy Services, L. P.) to Director, Office of Nuclear Material Safety and Safeguards (NRC) regarding "Revision 1 to Applications for a Material License Under 10 CFR 70, "Domestic licensing of special nuclear material," 10 CFR 40, "Domestic licensing of source material," and 10 CFR 30, "Rules of general applicability to domestic licensing of byproduct material"

3. Letter dated April 19, 2004, from T. C. Johnson (NRC) to R. Krich (Louisiana Energy Services) regarding "Request for Additional Information on Louisiana Energy Services Project License Application"

4. Letter NEF#04-018 dated May 19, 2004, from R. M. Krich (Louisiana Energy Services, L. P.) to Director, Office of Nuclear Material Safety and Safeguards (NRC) regarding "Response to NRC Request for Additional Information Regarding National Enrichment Facility Safety Analysis Report and Emergency Plan"

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By letter dated December 12, 2003 (Reference 1), E. J. Ferland of Louisiana Energy Services (LES), L. P., submitted to the NRC applications for the licenses necessary to authorize construction and operation of a gas centrifuge uranium enrichment facility. Revision 1 to these applications was submitted to the NRC by letter dated February 27, 2004 (Reference 2). By letter dated April 19, 2004 (Reference 3), the NRC provided the initial technical review of the license application and requested additional information and clarifications be provided.

The Reference 3 letter includes NRC Requests for Additional Information (RAIs) concerning instrumentation and controls. The LES responses to these NRC RAIs were provided in the Reference 4 letter. In a June 28, 2004, conference call between LES and NRC representatives concerning clarification of the responses to the NRC RAIs regarding instrumentation and controls, LES representatives indicated that a copy of the LES configuration management procedure would be provided to the NRC for information. This procedure is included in the Enclosure, "Louisiana Energy Services Configuration Management Procedure."

If you have any questions or need additional information, please contact me at 630-657-2813.

Respectfully,

R. M. Krich
Vice President – Licensing, Safety, and Nuclear Engineering

Enclosure:
Louisiana Energy Services Configuration Management Procedure

cc: T.C. Johnson, NRC Project Manager

ENCLOSURE

Louisiana Energy Services Configuration Management Procedure

Title: **Configuration Management**			
	Approval Functional Manager Date: 7/27/04		Approval Vice President, Licensing, Safety, and Nuclear Engineering Date: 7/27/04
Procedure No. AP-CM-1.1	Revision No. 0	Effective Date	Page No. 1 of 7

Training Level	**B**

Procedure Change History

- **Initial Issue**

Impact of Change

- **No Impact**

1.0 PURPOSE

1.1 This procedure provides a systematic review process necessary to ensure plant design and licensing Configuration Documents are updated and maintained during the design phase of the Louisiana Energy Services (LES) National Enrichment Facility (NEF) prior to issuance of the NEF Materials License.

1.2 This process ensures the design basis and technical baseline for the NEF is accurate and the license application is up-to-date.

1.3 This procedure does NOT provide guidance to determine the acceptability of a Configuration Change; rather, it ensures that all applicable NEF Configuration Documents are reviewed and appropriate Configuration Changes are processed as required to reflect changes approved in accordance with other procedures/ processes that evaluate the acceptability of a change.

NOTE: Configuration Management after issuance of the NEF Materials License will be governed by 10 CFR 70.72. Appropriate guidance will be provided by future procedures.

2.0 SCOPE

2.1 This procedure is applicable to any Configuration Change to the NEF Configuration Documents. These Configuration Changes are made in accordance with one or more of the following processes that have been accepted by the LES in accordance with the Quality Assurance Program Description (QAPD).

2.1.1 URENCO Configuration Management Procedure

2.1.2 AREVA/Framatome Configuration Management Procedure

2.1.3 Architect Engineer Configuration Management Procedure

2.1.4 LES Procedure AP-LS-1.1, Written Communications

NEF Configuration Changes as a result of procedures and processes listed in Section 2.1 include changes to the design and licensing basis documents listed in Attachment 1 referenced documents. The Attachment 1 documents are maintained current with each change approved in accordance with those procedures and processes.

A request for Configuration Change can be made by any individual or organization, and is not required to follow any formalized format. Configuration Change requests shall be authorized by LES prior to detailed development. Once authorized, the Configuration Change request is forwarded to the appropriate organization to develop the Configuration Change Package in accordance with the procedures and processes listed in Section 2.1.

3.0 DEFINITIONS

3.1 Configuration Documents are approved documents that are used in the design and future construction and operation of the NEF. These documents include the documents listed in Attachment 1 references.

As new documents related to the design and future construction and operation of the NEF are prepared and issued, these documents are included in the Configuration Management program and added to the documents referenced in Attachment 1 as NEF Configuration Documents.

3.2 Configuration Change during the design phase is the alteration of the design or technical requirements of any Configuration Document. However, not all Configuration Document changes are a result of Configuration Changes. For example, editorial or format revisions to the License Application would not be considered Configuration Changes.

3.3 Configuration Change Package documents and justifies all applicable and related changes to design and licensing basis documents, and includes documentation of the Configuration Change Impact Assessment of Attachment 2. Configuration Change Package closeout requires documented completion of all identified implementation requirements.

4.0 RESPONSIBILITY

4.1 LES Engineering and Contracts Manager (or designee, which at this time is assigned to be fulfilled by the LES Vice President, Licensing, Safety, and Nuclear Engineering, or his designee) - reviews and authorizes all conceptual Configuration Change requests to commence detailed development. Once the Configuration Change Package and Configuration Change Impact Assessment are drafted, the LES Engineering and Contracts Manager (or designee) shall approve the change.

4.2 LES Health, Safety, & Environment (HS&E) Manager (or designee, which at this time is assigned to be fulfilled by the LES Vice President, Licensing, Safety, and Nuclear Engineering, or his designee) is responsible for assuring all Configuration Changes to NEF license application documents are appropriate and submitted to the NRC in a timely fashion. Furthermore, any changes that do not affect the license application, but reduce the level of commitments or margin of safety in the design bases of items relied on for

safety (IROFS) or in the Integrated Safety Analysis (ISA), shall be identified and reported to the NRC prior to final implementation of the Configuration Change.

4.3 Responsible Organization – prepares the Configuration Change Package in accordance with the applicable procedure/process identified in Section 2.1. The responsible organization retains responsibility for assuring completion of all required reviews and approvals. The associated procedure/process shall include steps to assure that:

4.3.1 Preparer(s) shall be technically qualified in the related design discipline(s). The preparer shall also initiate the Configuration Change Impact Assessment in accordance with this procedure, which shall become part of the Configuration Change Package.

4.3.2 Peer reviewer(s) shall be technically qualified in the related design discipline(s) and shall provide an independent validation of the adequacy of the Configuration Change Package including Configuration Change Impact Assessment. Inter-Organizational Reviews may suffice for this review when applicable.

4.3.3 Responsible Organization(s) shall identify and coordinate appropriate Inter-Organizational reviews, which at a minimum includes: (1) screening by two interdisciplinary ISA Team Members for potential impact on ISA, including IROFS or items that could potentially affect the function of IROFS; (2) LES HS&E Manager (or designee), and as appropriate (3) designated construction management, operations, QA, and procurement personnel.

4.4 Inter-Organizational Review(s) shall be technically qualified in the related design discipline(s) and shall provide validation of the adequacy of the Configuration Change Package including Configuration Change Impact Assessment. Furthermore, the Inter-Organizational review shall process changes to organization-specific controlled Configuration Documents required to support the Configuration Change in accordance with the applicable procedure/process listed in Section 2.1.

4.5 ISA Team – All Configuration Change Packages shall be reviewed (i.e., screened) by two interdisciplinary ISA Team Members. This interdisciplinary review shall ensure consistency between documents, including consistency between design changes and the ISA. The interdisciplinary reviews ensure design changes either: (1) do not impact the ISA, (2) are accounted for in subsequent changes to the ISA, or (3) are not approved or implemented. This screening shall be performed in accordance with the Framatome ISA Procedure 51-2400554 – 00, "Integrated Safety Analysis Procedure National Enrichment Facility."

5.0 PROCEDURE

A request for Configuration Change can be made by any individual or organization, and is not required to follow any formalized format. LES Engineering and Contracts Manager (or designee) shall review and approve all conceptual Configuration Change requests, and if appropriate authorize detailed Configuration Change Package development. Once authorized, the Configuration Change request is forwarded to the appropriate organization to develop the Configuration Change Package in accordance with the procedures and processes listed in Section 2.1.

5.1 Preparation

5.1.1 Configuration Change preparer (in accordance with procedures/ processes as listed in Section 2.1) shall initiate a Configuration Change Impact Assessment (refer to Attachment 2) and review Configuration Documents (refer to Attachment 1 referenced documents) for potential impact.

5.1.2. If the preparer determines the Configuration Change impacts any Configuration Document, then the preparer shall draft a proposed change to the impacted Configuration Document(s) and, if applicable, the Attachment 1 referenced document(s). The proposed change(s) shall be routed with the Configuration Change Package for review and approval in accordance with the applicable procedure/process. The preparer also determines the appropriate Inter-Organizational reviews and inputs required.

5.1.3 The Configuration Change Impact Assessment shall also document whether the Configuration Change reduces the level of commitment or margin of safety associated with any IROFS or ISA.

5.2 Review

5.2.1 In accordance with the applicable procedure/process of Section 2.1, the Configuration Change Package, including Configuration Change Impact Assessment, is routed for a peer review, unless Inter-Organizational reviews are required and encompass the necessary review scope. The peer review (when required) shall provide validation of the adequacy of the Configuration Change, impact of the Configuration Change on all Configuration Documents, and the adequacy of the identified Inter-Organizational reviews required.

5.2.2 Inter-Organizational Review(s) shall include at a minimum screening by two interdisciplinary ISA Team Members. Additionally, review by LES HS&E Manager (or designee) is required for all Configuration Change Packages. The Inter-Organizational review shall provide validation of the adequacy of the Configuration Change, impact of the Configuration Change on all Configuration Documents, and the adequacy of the identified Inter-Organizational reviews required. Changes to Configuration Documents under the control of an Organization, shall be that Organization's responsibility to revise and provide for inclusion in the Configuration Change Package.

5.2.3 ISA Team Members screening shall evaluate the impact to ISA, and if no impact is identified, document rationale for concluding no impact to the ISA or IROFS. If potential impact is identified, the ISA Team Member(s) shall note requirement for formal review in accordance with Framatome ISA Procedure 51-2400554 – 00, "Integrated Safety Analysis Procedure National Enrichment Facility." Any required ISA Team evaluations shall become part of the Configuration Change Package.

5.3 Approval

5.3.1 Once the Configuration Change Package and Configuration Change Impact Assessment is drafted, the LES Engineering and Contracts Manager (or designee) shall approve the Configuration Change and process any impacts to the license application identified on the Configuration Change Impact Assessment.

5.3.2 Organizations responsible for Configuration Documents shall internally approve Configuration Changes in accordance with the procedures/processes identified in Section 2.1.

5.4 NRC Notification

5.4.1 Configuration Changes that require revisions to the license application shall be processed and submitted to the NRC in accordance with AP-LS-1.1, Written Communications. The transmittal correspondence shall be noted in the Configuration Change Package as part of the required implementation.

5.4.2 Configuration Changes that do not affect the license application, but result in changes that reduce the level of commitments or margin of safety in the design bases of IROFS or in the ISA, will be reported to the NRC prior to considering the change implemented.

6.0 REFERENCES

6.1 URENCO Configuration Management Procedure

6.2 AREVA/Framatome Configuration Management Procedure

6.3 Architect Engineer Configuration Management Procedure

6.4 LES Procedure AP-LS-1.1, Written Communications

6.5 AREVA/Framatome ISA Procedure 51-2400554 – 00, "Integrated Safety Analysis Procedure National Enrichment Facility."

7.0 ATTACHMENTS

7.1 Attachment 1, "NEF Configuration Documents"

7.2 Attachment 2, "Configuration Change Impact Assessment"

Attachment 1
NEF CONFIGURATION DOCUMENTS

URENCO Configuration Documents

- URENCO controlled document list

Architect Engineer Configuration Documents

- AE controlled document list

AREVA/Framatome Configuration Documents

- AREVA/Framatome controlled document list

Integrated Safety Analysis (ISA) Documents

- AREVA/Framatome controlled document list
- URENCO Classified ISA controlled document list

LES License Application Configuration Documents

- Safety Analysis Report (SAR)
- Fundamental Nuclear Material Control Plan (FNMCP)
- Emergency Plan (EP)
- Environmental Report (ER)
- Physical Security Plan
- Guard Force Training and Qualification Plan
- Safeguards Contingency Plan
- Standard Practice Procedures Plan for the Protection of Classified Matter

Attachment 2
CONFIGURATION CHANGE IMPACT ASSESSMENT

Configuration Change Tracking #: _____

Summary of Configuration Change:

Configuration Documents Requiring Revision:

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IROFS or ISA Impacts:

Affected IROFS and/or ISA –

Commitments or Margin of Safety Reduced –

Justification for Reduction (if applicable) –

Attachment 2
CONFIGURATION CHANGE IMPACT ASSESSMENT

APPROVALS
Preparer: All potential impacts to Configuration Documents have been identified and associated changes have been processed. _____ _____ Preparer Date:
Peer and/or Inter-Organizational Reviewer(s): All potential impacts to Configuration Documents have been identified and associated changes have been processed. _____ / _____ _____ Reviewer / Organization Date: _____ / _____ _____ Reviewer / Organization Date: _____ / _____ _____ Reviewer / Organization Date: _____ / _____ _____ Reviewer / Organization Date:
LES Licensing: All potential impacts to Licensing Documents and/or reduction in commitment or margin of safety have been identified and associated changes have been processed. _____ _____ LES HS&E Manager (or designee) Date:
ISA/IROFS Reviewers: All potential impacts to ISA Documentation, ISA Summary, and IROFS boundaries have been identified and associated changes have been processed. _____ / _____ _____ ISA Team Member 1 / Discipline Date: _____ _____ ISA Team Member 2 / Discipline Date:

Attachment 2
CONFIGURATION CHANGE IMPACT ASSESSMENT

Approval:

All applicable Configuration Documents have been identified and associated changes have been processed or are being appropriately tracked.

_____ _____

LES Engineering and Contracts Manager (or designee) Date

IMPLEMENTATION / CLOSEOUT

LES Licensing:

All applicable revisions License Application Documents have been submitted to NRC

AND

Applicable changes that reduced the level of commitment or margin of safety in the design bases of IROFS or in the ISA have been submitted to the NRC

_____/_____ _____/_____ _____/_____

Letter # / Date Letter # / Date Letter # / Date

_____ _____

LES HS&E Manager (or designee) Date:

Approval:

Configuration Change implementation completed.

_____ _____

LES Engineering and Contracts Manager (or designee) Date