

Docket: 70-36

LICENSEE: Westinghouse Electric Company LLC - Former Hematite Fuel Manufacturing  
Festus, Missouri

SUBJECT: SAFETY EVALUATION REPORT: SUBMITTAL DATED DECEMBER 7, 2004 -  
PRIORITY REQUEST FOR AMENDMENT TO CHAPTER 3 SECTION 3.2.2 OF  
SNM-33

## BACKGROUND

By letter dated December 7, 2004, Westinghouse Electric Company LLC (Westinghouse), submitted a priority request for amendment to Chapter 3 of SNM-33 to change the ventilation requirements during current phases of site decommissioning for work in the building complexes at the Hematite facility. On August 2, 2001, and on September 11, 2001, Westinghouse provided the U.S. Nuclear Regulatory Commission (NRC) with notification of cessation of all principal licensed activities and change of the scope of the authorized license activities to performance of decommissioning activities. On October 15, 2001, and April 11, 2002, the NRC respectively issued amendments 40 and 42 to the Hematite facility license SNM-33 and reduced the possession limits for source and special nuclear material and changed the scope of authorized activities to the performance of decommissioning activities.

## DISCUSSION

### Change in Scope of Licensed Activities

Section 3.2.2, "Ventilation," of the current license application requires that the air flow during the production shall be from areas of lower to areas of higher contamination. The dispersible forms of uranium powder will be handled in ventilated enclosures with face velocities having sufficient air flow to assure minimum face velocities of 100 fpm. The HEPA ventilation systems shall be Dioctylphthalate (DOP) tested in place after any disturbance of the HEPA filters.

Furthermore, the direction of air flow in the process buildings shall be checked at least annually and documented. Major design changes having a potential to impact air flow direction may require a re-check of the air flow direction once the design change has been completed. If the air flow direction is not acceptable, action will be taken. Fire prevention and the potential for generating explosive atmospheres will be considered in ventilation design. Air effluents from process areas and process equipment involving uranium in a dispersible form shall be subject to air cleaning.

Westinghouse notes that meeting the above existing ventilation requirements of the current license, which were established for an operating plant with consistent processes, is unnecessary and it is difficult to demonstrate compliance. Westinghouse notes under decommissioning operations it is necessary to maintain flexibility that addresses the specific activities to be conducted which can change frequently. Specifically, Westinghouse has requested for the removal of the license requirement to maintain airflow from low contamination to high contamination with a minimum face velocity of 100 fpm and substitution of a leak-test for the HEPA filters instead of the current DOP test. Additionally, Westinghouse requests that

under Section 3.2.3.1 "Air Sampling Criteria," the Radiation Safety Officer (RSO) instead of the currently prescribed Manager Environmental Health and Safety, be responsible to prescribe the types of air sampling collected at a specific decommissioning phases or location.

Westinghouse has ceased all operational activities and has entered facility decommissioning phases. Westinghouse has committed to maintain building ventilation, hoods, glove boxes and use local exhaust as appropriate to control contamination and airborne concentrations. Westinghouse has committed to at least one building exhaust to remain operational until the ventilation system is disassembled and removed. Westinghouse shall continue to comply with the current pressure differential of less than 6 inches of water across the filter banks or otherwise the filter banks shall be replaced.

Westinghouse notes that the application meets the regulatory requirements of the NRC regulations at 10 CFR 20.1101 (b), "Radiation Protection Program," and the Westinghouse shall provide procedures and engineering controls to achieve occupational dose and doses to members of the public that are as low as reasonably achievable. The activities being conducted during this phase of decommissioning are consistent with those that occurred during the operation.

#### ENVIRONMENTAL REVIEW

The NRC staff agree with the Westinghouse assessment that the issuance of the amendment will not result in: a significant change in the types or significant increase in the amount of effluent, nor will it result in significant individual or cumulative occupational radiation exposure, nor will it result in a significant construction impact, and does not result in a significant increase in the potential for or consequences from a radiological accident. Therefore, NRC staff has determined that the proposed changes do not adversely affect public health and safety or the environment. In accordance with NRC regulation at 10 CFR 51.22(c)(11) the action is categorically excluded from the requirement to prepare a site-specific environmental assessment.

#### CONCLUSION

The NRC staff has reviewed the proposed amendment and has determined that the proposed changes will have no adverse effect on the public health and safety or the environment. Therefore, approval of the amendment application is recommended.

#### PRINCIPAL CONTRIBUTORS

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