FRAMATOME ANP

An AREVA and Siemens Company

FRAMATOME ANP, Inc.

September 1, 2005

CFH:05:030

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

Subject: **Amendment Request to Use of ICRP 68 for ALI and DAC Values**

References: 1) SNM License 1168, Docket No. 70-1201

2) NRC Staff Requirements Memorandum, To Request Commission Approval to Grant Exemptions from Portions of 10 CFR Part 20, dated April 21, 1999 (SECY-99-077)

Enclosure: Change pages to Chapter 1 of license application

Dear Mr. Gleaves:

Framatome-ANP, Inc. hereby requests an amendment to Chapter 1 of its license application to authorize use of annual limits of intake (ALIs) and derived air concentrations (DACs) based upon dose coefficients published in the International Committee on Radiological Protection (ICRP) publication number 68, entitled *Dose Coefficients for Intake of Radionuclides by Workers* (ICRP 68, Volume 24, No. 4, 1994).

The proposed exemption request to 10 CFR 20, Appendix B as contained herein is consistent with directives described in the Reference 2. In addition, this proposed licensing action is administrative and procedural in nature and commensurate with criteria allowing a categorical exclusion, as specified in 10 CFR 51.22 (c)(11).

Framatome ANP considers this request to be administrative in nature in that:

- There is no significant change in the types or significant increase in the amounts of any effluents that may be released offsite.
- There is no significant increase in individual or cumulative occupational radiation exposure.
- There is no construction activity or impact involved with the request.
- There is no significant increase in the potential for or consequences from radiological accidents.

FRAMATOME ANP, Inc.
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NMSS01

Should this request be accepted, the adoption of the revised methodology will be applied to 2005 inhalation dose.

Enclosed, to accomplish this change are six copies of the change pages for the revised license application, Chapter 1.

Should you have any questions regarding this submittal, please call me at (434)-832-5276.

Sincerely,

Charlie F. Holman
Manager, Environmental,
Health, Safety and Licensing.
Framatome ANP, Inc.

Enclosure I

Change Pages

Page	Section	Description
1-7 – 1-8	1.5 (f)	Added paragraph describing authorization to use ICRP 68 dose coefficients

c) Free-Release Limits

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d) Possession at Reactor Sites

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a) Site Geography

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The site is adjacent to state route 726. There are no interstate highways nearby.

The nearest body of water is the James River. The facility site lies on a river bend bounded on three sides by the James River and on the southeastern side by Mt. Athos.

b) Demographics

Census data from the U.S. Census Bureau for the 2000 census indicates that the population for Campbell County was 51,078. Population for the city of Lynchburg was 65,269.

Because of the terrain, most of the population within a 5 mile radius of the facility resides over 3 miles from the site. There are no significant clusters of population within a 2 mile radius of the facility. The closest inhabitants occupy residences, which are located about one-half mile to the ENE.

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