

**Enclosure 2 to AET 05-0085**

**Submittal of Additional Responses Related to the Integrated Safety Analysis  
(Non-Proprietary Information)**

**Enclosure 2 of AET 05-0085  
(Non-Proprietary)**

The U.S. Nuclear Regulatory Commission (NRC) has conducted several conference calls with USEC Inc. (USEC) regarding selected areas of the License Application and Integrated Safety Analysis (ISA) Summary for the American Centrifuge Plant (ACP) during the weeks of September 12, 2005, October 17, 2005, and October 31, 2005. The responses to questions and follow-up actions identified during these conference calls are provided below.

1. The organizational information in Section 1.2.2 of the license application is not up to date.

**USEC Response**

The license application and supporting documents have been revised to reflect USEC's reorganization. Changed pages are being submitted as Enclosure 3 (license application and Quality Assurance Program Description) and Enclosure 4 (Security Program) of this letter.

2. Page 3-15 of the license application, Worker in the Restricted Area (WRA) needs to have some discussion on the egress times (i.e., to get out of harms way or to get out of the building).

**USEC Response**

The license application and ISA Summary have been revised to include discussion about egress time for the WRA. Also, refer to Appendix F, Section F.1.2.1.1 of the ISA Summary for additional justification. Changed pages are being submitted as Enclosure 3 (Chapter 3.0 of the license application) and Enclosure 5 (ISA Summary).

3. Section 1.1.5.5.5 of the license application (Page 1-19) refers to American Society for Testing and Materials (ASTM) standards concerning liquid UF<sub>6</sub> sampling. However, no particular ASTM standard is identified.

**USEC Response**

Section 1.1.5.5.5 of the license application has been revised to reflect two new references (i.e., USEC-651 and ASTM C1052) as noted in Section 1.5. Likewise, Section 3.5.5 of the ISA Summary has been revised to reflect these two new references as noted in Section 3.14. ASTM C1052 has also been added to the listing of Codes and Standards

identified in Section 1.4 of the license application. Changed pages are being submitted as Enclosures 3 (license application) and 5 (ISA Summary) of this letter.

4. Consider including ASTM C787, *Standard Specification for Uranium Hexafluoride for Enrichment* and ASTM C996, *Standard for Uranium Hexafluoride Enriched to Less Than 5% 235U* in Section 1.4 of the license application as these are identified in Footnote "a" of Table 1.2-2 (Page 1-63) of the application.

#### **USEC Response**

Section 1.4.5 of the license application has been revised to reflect the ASTM standards C787 and C996. Changed pages are being submitted as Enclosure 3 of this letter.

5. Are the quarterly liquid effluents and airborne effluents captured in a published report? If so, provide appropriate reference(s) to the NRC.

#### **USEC Response**

The airborne effluents are reported to U.S. Environmental Protection Agency (EPA) annually in the National Emission Standards for Hazardous Air Pollutants (NESHAP) Report pursuant to 40 CFR Part 61, Subpart H. The NESHAP Radionuclide Emission Report for Calendar Year 2004 was submitted to the NRC by the United States Enrichment Corporation (Docket Numbers 70-7001 and 70-7002) by letter GDP 05-0027, dated June 29, 2005.

The liquid effluents are reported quarterly to the Ohio EPA in the Quarterly Radiological Discharge Monitoring Report pursuant to a condition of USEC's National Pollutant Discharge Elimination System Permit. The Second Quarter – Calendar Year 2005 report was submitted to the NRC by the United States Enrichment Corporation (Docket Numbers 70-7001 and 70-7002) by letter GDP 05-0036, dated August 24, 2005.