



Global Nuclear Fuel

A Joint Venture of GE, Toshiba, & Hitachi

Global Nuclear Fuel – Americas, LLC
Castle Hayne Road, Wilmington, NC 28401

January 27, 2006

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

Subject: Revised ISA Summary per 10CFR70.72(d)

Reference: (1) License SNM-1097, Docket 70-1113
(2) Letter, C. M. Vaughan to Director, ONMSS, 6/12/03
(3) Letter, K. M. Ramsey to C. M. Vaughan, 6/16/04
(4) Letter, C. M. Vaughan to Director, ONMSS, 8/5/04
(5) Letter, K. M. Ramsey to C. M. Vaughan, 9/22/04, RAI
(6) Letter, C. M. Vaughan to Director, ONMSS, 10/12/04
(7) Letter, C. M. Vaughan to Director, ONMSS, 10/21/04
(8) Letter, K. M. Ramsey to C. M. Vaughan, 11/5/04
(9) Meeting with the NRC in Washington, DC, C. M. Vaughan, G. H. Smith
and F. E. Beaty on 11/16/04
(10) Letter, C.M. Vaughan to Director ONMSS, 11/30/04
(11) Letter, C.M. Vaughan to Director ONMSS, 1/28/05
(12) Letter, C.M. Vaughan to Director ONMSS, 5/18/05

PROPRIETARY INFORMATION PURSUANT TO 2.390(d)

Attachment 2 of this letter contains company proprietary information. Upon removal of Attachment 2, this document is decontrolled. Please withhold Attachment 2 of this letter from the public.

Global Nuclear Fuel – Americas, LLC (GNF-A) in Wilmington, NC hereby submits Revision 6 to our ISA Summary in order to provide revised summary pages, make corrections and modifications that will clarify our ISA program and provide a brief summary of these changes in order to comply with the requirements of 10CFR70.72(d)(3).

Pursuant to 10CFR70.72(d)(2), the records required by 10CFR70.62 (a)(2) have undergone minor modifications to comply with 10CFR70 requirements.

The following are provided as Attachments to this letter.

Attachment 1 contains the Description and Reason for Change by Page and Section

Attachment 2 contains the ISA Summary in its entirety. Within this Summary document, are the pages that have changed as identified in Attachment 1 above.

All pages in the Table of Contents are identified as 1/27/06, Rev. 6. A vertical line has been placed in the right hand margin where changes in the Table of Contents occurred for this submittal.

In the rest of the document, only the pages containing a change for this revision are identified as 1/27/06, Rev. 6 with a vertical line in the right hand margin where the change was made. The remaining pages that did not change contain their previous revision number, previous date and revision mark where the previous change was made.

Please contact me on (910) 675-5656 if you have any questions or would like to discuss this matter further.

Sincerely,

Global Nuclear Fuel – Americas, LLC

Original Signature on file

C. M. Vaughan, Manager
Facility Licensing

Attachments

cc: CMV-06-010

Dr. W. Travers, Regional Administrator – Region II, Atlanta
M.N. (Nick) Baker, HQ, Washington, D.C.

ATTACHMENT 1

DESCRIPTION AND REASON FOR CHANGE BY PAGE AND SECTION

DESCRIPTION AND REASON FOR CHANGE BY PAGE AND SECTION			
Pages	Section	Description of Change	Reason for Change
Cover		Updated revision number, date and description of the cover sheet.	Annual ISA update.
ii	TOC	Removed section 3.4.2, DCP Annunciator and renumbered 3.4.3 Process Monitoring as 3.4.2. Also, removed the underline on existing pages i and ii under the letters "A" which caused a vertical line to appear in the right column. All pages of the Table of Contents are identified as Revision 6, 1/27/06.	See change below.
1.4	Table 1.1	Removed AEGL limits from consequence severity table.	GNF-A will use ERPG limits only.
1.8	Table 1.6	Added footnote, and renamed Enhanced controls to Augmented controls.	Footnote was missing, renamed per NRC request.
1.9	Table 1.7	Removed verbiage describing Duration Index for failures lasting up to one minute as "not" very common.	Verbiage is in error. This is very common for engineered controls.
1.9	Table 1.7	Added footnotes.	Footnotes were missing.
1.10	Table 1.9	Renamed Enhanced controls to Augmented controls.	Per NRC request.
1.13	1.5.9	Modified section heading to include Defense in Depth.	Per NRC request.
2.2 – 2.2A	2.2	Added statement on external events. Text on page 2.2A remained the same, however, page 2.2A is a new page.	Per NRC discussions.
2.3 – 2.3A	2.2.1	Added statistics on tornado occurrence and severity in New Hanover County. Page 2.3A is a new page, but the text did not change from the last submittal.	Per NRC discussions.
2.5 – 2.5A	2.3.2	Modified description of Criticality Warning System, and added note on testing of horn system. Page 2.5A is a new page, but the text did not change from the last submittal.	GNF-A Nuclear Safety modifications.
3.5	3.3.2	Modified description of fire alarm detection annunciator.	The local fire detection annunciator panel was removed from the DCP facility. Alarms are now annunciated at ECC.

DESCRIPTION AND REASON FOR CHANGE BY PAGE AND SECTION			
Pages	Section	Description of Change	Reason for Change
3.6A, 3.7	3.4.1, 3.4.2, 3.4.3	Modified description of fire alarm detection annunciator. Removed section 3.4.2, and renumbered section 3.4.3	The local fire detection annunciator panel was removed from the DCP facility. Alarms are now annunciated at ECC.
4.15	4.3	Added additional node sections in Table 4.3.	GNF-A has performed ISA evaluations on these additional areas in 2005.
5.46	5.1.13	Replaced IROFS 1214 with IROFS 1216.	Transcription error from internal ISA to ISA Summary document.
5.69 – 5.73	5.1.20	Removed accident sequence two, and renumbered subsequent accident sequences.	Per NRC discussions with GNF-A, this accident sequence should not be included in ISA Summary.
5.113 – 5.114A	5.2.1	Revised node per ISA team review. Replaced IROFS 2104, and added additional accident sequence.	Per NRC discussion, IROFS 2104 was improperly applied.
5.115 – 5.116	5.2.2	Reassigned IROFS 2101 to active control of gad slugger feed hopper interlock.	ISA team determined that the passive control for IROFS 2101 was not as effective as the active control at mitigating this accident scenario
5.121	5.2.5	Revised node per ISA team review. Consolidated IROFS 2202, 2203, and 2204 with revised IROFS 2201. Updated overall likelihood.	These IROFS were designated as an IROFS system rather than individual IROFS.
5.125 – 5.126	5.2.7	Revised node per ISA team review. Consolidated IROFS 2202, 2203, and 2204 with revised IROFS 2201. Updated overall likelihood.	These IROFS were designated as an IROFS system rather than individual IROFS.
5.135	5.3.1	Revised node per ISA team review. Modified IROFS 4101 to reflect mass check on oil cans prior to addition to oil drum.	ISA team determined that IROFS 4101 oil drum scan, was not effective for this accident scenario.
5.146	5.3.7	Revised text of accident scenario.	Removed reference to GNF-A internal process limits.

Note that the following changes made to Appendix A reflect the reasons for changes in Section 5 noted above.

Director, ONMSS

January 27, 2006

Attachment 1

Page 4 of 4

DESCRIPTION AND REASON FOR CHANGE BY PAGE AND SECTION		
Pages	Section	Description of Change
A1.5	Appendix A	Corrected reference to IROFS 1112 for section 5.1.11 (no correction was necessary in section 5.1.11).
A1.6	Appendix A	In section 5.1.13, changed reference to IROFS 1216.
A1.9	Appendix A	In section 5.1.20, removed accident sequence 2, and renumbered subsequent accident sequences.
A1.14	Appendix A	Added additional accident sequence and IROFS for section 5.2.1.
A1.14A	Appendix A	Removed IROFS 2202, 2203, and 2204 from sequence 5.2.5
A1.15	Appendix A	Removed IROFS 2202, 2203, and 2204 from sequence 5.2.7
A1.16	Appendix A	Modified description of IROFS 4101

ATTACHMENT 2

The ISA Summary is being submitted in its entirety to facilitate NRC review.

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