



February 1, 2006  
AET 06-0020

Mr. Jack R. Strosnider  
Director, Office of Nuclear Material Safety and Safeguards  
Attention: Document Control Desk  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555-0001

**American Centrifuge Plant**  
**Docket Number 70-7004**  
**Submittal of Additional Information for the American Centrifuge Plant (TAC Nos. L32306, L32307, and L32308)**

Dear Mr. Strosnider:

Pursuant to a request from the U.S. Nuclear Regulatory Commission staff, USEC Inc. hereby submits planned changes for Chapter 3.0 of the license application for the American Centrifuge Plant as Enclosure 1 of this letter. These planned changes will be finalized and submitted to the NRC in the next revision of the license application.

If you have any questions regarding this matter, please contact Peter J. Miner at (301) 564-3470.

Sincerely,

Steven A. Toelle  
Director, Regulatory Affairs

cc: Y. Faraz, NRC HQ  
B. Smith, NRC HQ

Enclosure: As Stated

**Enclosure 1 of AET 06-0020**

**Planned Changes to the License Application for the American Centrifuge Plant**

design codes and standards employed, material and energy balances, IROFS (e.g., interlocks, detection, or suppression systems), electrical classification, and relief system design and design basis; and

- The applicability of 29 CFR 1910.119 (Process Safety Management) and 40 CFR Part 68 (Risk Management Plan) to operation of the ACP to assure that chemicals not related to the licensed material are evaluated as necessary.

The ISA considers chemical process safety through out the analysis development. Process safety is considered when identifying the credible accident scenarios, developing the IROFS, and establishing the management measures to ensure the health and safety of the workforce and public. The ISA and ISA Summary are maintained and updated by written procedures using qualified personnel to ensure that process safety information is accurately reflected in accordance with 10 CFR 70.72. The license should be conditioned as follows: As the final design is developed for the ACP, USEC's management system and design approach will require that process safety information be updated as appropriate. Upon completion of the design and updating of the appropriate documentation involving process safety information, USEC shall provide the Commission with 120 days advance notice of its plan to introduce UF<sub>6</sub> in the American Centrifuge Plant in order to conduct its inspections involving process safety information that are required by 10 CFR 70.32(k).

### 3.1.2 Integrated Safety Analysis

An ISA of the design and operation of the ACP was conducted in accordance with the guidance provided in NUREG-1513, *Integrated Safety Analysis Guidance Document* and the requirements of 10 CFR 70.62(c). The ISA is a collection of the design documentation and programmatic information reviewed and utilized during the course of the ISA effort. This information is available on site for NRC review.

The ISA documentation is sufficiently detailed to identify the following:

- Radiological hazards;
- Chemical hazards that could increase radiological risk;
- Facility hazards that could increase radiological risk;
- Chemical hazards from materials involved in processing licensed materials;
- Potential accident sequences;
- Consequences and likelihood of each accident sequence; and
- IROFS including the assumptions and conditions under which they support compliance with the performance requirements of 10 CFR 70.61.

Information contained within  
does not contain  
Export Controlled Information

Reviewer: G. Peed  
Date: 01/31/96

Should the addition of new processes or other changes to the ACP be necessary, evaluations of appropriate complexity for each process will be performed in accordance with 10 CFR 70.72, using established ISA methods to ensure the processes can be carried out in a manner such that compliance with the performance requirements of 10 CFR 70.61 are maintained. The ISA methods utilized for the ACP are described in section 3.1.2.1 of this License Application.

USEC maintains the ISA and ISA Summary so that it is accurate and up-to-date by means of a suitable configuration management system, described in Section 11.1 of this license application. ACP procedures specify the criteria for changing the ISA Summary. Changes to the ACP are evaluated against the ISA and ISA Summary using a change process that meets the requirements of 10 CFR 70.72. Changes to the ISA Summary are submitted to the NRC in accordance with 10 CFR 70.72(d)(1) and (3). The ISA accounts for any changes made to the ACP or its processes (e.g., changes to the site, operating procedures, or control systems). Any facility change, operational change, or change in the process safety information that may alter the parameters of an accident sequence is evaluated by means of the ISA methods. USEC evaluates proposed changes to the ACP or its operations by means of the ISA methods and designates new or additional IROFS, along with appropriate management measures, as necessary. USEC will periodically review IROFS per the requirements of 10 CFR 70.62(a)(3) to ensure their availability and reliability for use, and consistency with the ISA. As the final design is developed for the ACP, the management system and design approach will require that the final designs be reviewed against the ISA to ensure the ISA is bounding. The license should be conditioned as follows: As the final design is developed for the ACP, the management system and design approach will require that the ISA and ISA Summary be updated as appropriate and the final designs be reviewed against the ISA to ensure the ISA is bounding. Upon completion of the design and updating of the ISA and ISA Summary, USEC shall provide the Commission with 120 days advance notice of its plan to introduce  $UF_6$  in the American Centrifuge Plant in order to conduct its inspections involving the ISA and ISA Summary that are required by 10 CFR 70.32(k).

USEC also evaluates the adequacy of existing IROFS and associated management measures and makes any required changes prior to making changes to the ACP and/or its processes. If a proposed change results in a new type of accident sequence (e.g., different initiating event or significant changes in the consequences) or increases the consequences and/or likelihood of a previously analyzed accident sequence within the context of 10 CFR 70.61, USEC evaluates whether changes to existing or additional IROFS, or associated management measures are required. For any changes that require prior NRC approval under 10 CFR 70.72, USEC will submit an amendment request in accordance with 10 CFR 70.34 and 70.65.

The Engineering Manager is responsible for maintaining the ISA and ISA Summary (i.e., reviewing proposed changes, performing analyses, and ensuring implementation of required updates). The Regulatory Manager is responsible for submitting the required changes to the NRC and coordinating information requests from the NRC.

Suitably qualified personnel update and maintain the ISA and ISA Summary. The ISA team consists of at least one team leader who is formally trained and knowledgeable in the ACP's ISA methods and individuals with specific, detailed experience in the operation, hazards,