

April 20, 2006

Mr. Robert E. Link, Manager  
Environmental, Health, Safety and Licensing  
AREVA NP, Inc.  
2101 Horn Rapids Road  
Richland, WA 99352-0130

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION FOR AREVA NP, INC.,  
RICHLAND SITE-WIDE INTEGRATED SAFETY ANALYSIS SUMMARY  
REVIEW (TAC L31856)

Dear Mr. Link:

We have completed our review of your Integrated Safety Analysis (ISA) Summary, submitted by letter dated October 15, 2004 (ML042990522), associated with Materials License SNM-1227, accepted by our letter dated January 4, 2005 (ML050050015), and updated by submittals on January 28, 2005 (ML051450477), February 17, 2005 (ML050560341), and January 27, 2006 (ML060320045)<sup>1</sup>.

Our technical review of the ISA Summary and our on-site review the week of October 24-26, 2005, have identified some information or technical issues that require additional information. The additional information, specified in the enclosure, should be provided within 60 days from the date of this letter.

Prior to the staff's approval of the ISA, license commitments are needed that define the ISA methodology approved by the U.S. Nuclear Regulatory Commission (NRC). Please inform us of your plans to provide commitments in your license that include the following key elements:

- a. Describing the methods for determining the process hazards and accident sequences;
- b. Defining the criteria for determination of the indices for the likelihood of initiating events and items relied on for safety (IROFS);
- c. Defining the acceptance criteria for meeting the performance requirements of 10 CFR 70.61;

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<sup>1</sup>NRC staff review of the annual ISA update submitted with the January 27, 2006, letter, was limited to those areas related to the request for additional information contained herein. Complete review of the annual ISA update will be conducted separately.

- d. Defining “highly unlikely,” “unlikely,” and “credible”;
- e. Compiling and maintaining a database of process safety information;
- f. Providing procedures and criteria for changing and updating the ISA and designing and implementing a facility design change mechanism that meets 10 CFR 70.72;
- g. Having appropriate experience and expertise to maintain the ISA;
- h. Maintaining the ISA and supporting documentation so that it is accurate and up-to-date via a suitable configuration management system, and submitting changes to the ISA Summary in accordance with 70.72(d)(1) and (3);
- i. Training personnel in the facility’s ISA method or using qualified personnel to update and maintain the ISA and ISA Summary;
- j. Evaluating proposed changes to the facility or operations via the ISA,
- k. Addressing IROFS’ unacceptable performance deficiencies that are identified through updates to the ISA;
- l. Maintaining written procedures on site;
- m. Establishing IROFS and maintaining them to be available and reliable when needed; and
- n. Establishing and maintaining management measures to support the reliability and availability of IROFS.

If you have any questions regarding this letter, please contact Fred Burrows (the Team Leader for the ISA review) at (301) 415-8110 or via e-mail to [FHB@nrc.gov](mailto:FHB@nrc.gov).

In accordance with 10 CFR 2.390 of the NRC’s “Rules of Practice,” a copy of this letter will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of the NRC Agencywide Documents Access and Management System (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>.

The enclosure to this letter contains sensitive, unclassified information, and is therefore deemed Official Use Only - Proprietary Information. It will not be placed in the Public Document Room, nor will it be publicly available in ADAMS.

Sincerely,

/RA/

Merritt N. Baker, Project Manager  
Fuel Cycle Facilities Branch  
Division of Fuel Cycle Safety  
and Safeguards  
Office of Nuclear Material Safety  
and Safeguards

Docket No.: 70-1257  
License No.: SNM-1227

Enclosure: Request For Additional Information

R. Link

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