

ENCLOSURE 1

Compliance Evaluation Report

DOCKET NUMBER: 70-7002

CERTIFICATE HOLDER: United States Enrichment Corporation  
Portsmouth Gaseous Diffusion Plant  
Portsmouth, Ohio

SUBJECT: COMPLIANCE EVALUATION REPORT: APPLICATION DATED  
FEBRUARY 1, 2006, REVISION TO TECHNICAL SAFETY  
REQUIREMENTS (TSRS) 3.1.4 (UNTITLED) AND TABLE 3.2.2-1,  
"ON-SITE FUNCTIONAL STAFFING REQUIREMENTS"

### PROPOSED CHANGES

By letter dated February 1, 2006, the United States Enrichment Corporation (USEC) submitted a certificate amendment request (CAR) regarding the Certificate of Compliance for the Portsmouth Gaseous Diffusion Plant (PORTS). The amendment would make changes to PORTS Technical Safety Requirements (TSRs) 3.1.4 (untitled) and Table 3.2.2-1, "On-Site Functional Staffing Requirements." The changes reflect organizational changes at PORTS resulting in the elimination of the "Organization Manager" title and "Cascade Coordinator" position, consistent with the greatly reduced level of cascade activity at the plant.

Specifically, TSR 3.1.4 would be revised to replace "Organization Manager" with "organization manager." This change reflects elimination of the title of Organization Manager, and would leave TSR 3.1.4 to read:

- 3.1.4 The organization manager shall be responsible for the operations conducted within the facilities affected by this TSR for which he/she is responsible, and shall delegate in writing the succession of responsibility during absence from plant site.

Also, TSR Table 3.2.2-1, "On-Site Functional Staffing Requirements," would be revised to state the staffing requirement for the X-300 Building, also known as the "Plant Control Facility," as "1 assigned operator and 1 Power Operator." The current staffing requirement is stated as "1 assigned Operator or Cascade Coordinator and 1 Power Operator." The underlining marks the text that would be deleted.

### BACKGROUND

The PORTS minimum staffing requirements were originally constructed on the basis of a fully operational cascade. In 2001, enrichment operations at PORTS were terminated. Since that time, the majority of the cascade equipment has been placed in a "cold standby" condition that would allow restart at a later time if needed. USEC states that cascade cells have been evacuated of their gaseous UF<sub>6</sub> inventory, with the exception of unit X-25-7 in X-326, and selected cells in 27-1 and 27-2. This equipment supports uranium deposit removal, UF<sub>6</sub> cylinder repackaging, and purge operations.

## DISCUSSION

USEC states that the change to TSR 3.1.4 is a result of management restructuring which eliminated the title/position of Organization Manager and established a Director level position comparable to the Plant Manager. USEC characterizes this change as a minor administrative change which will establish management accountability where it is most direct in ensuring TSR compliance. Conversion of the language to the more generic "organization manager" will establish responsibility more broadly, and apply to any manager whose responsibility includes operations subject to TSRs, not just "Organization Managers." Therefore, the staff agrees that this change is appropriate and will continue to ensure adequate safety.

The change to TSR Table 3.2.2-1 is consistent with the reduced level of cascade activity at the plant, and the reduced need for ongoing cascade coordination oversight. Furthermore, the activities and responsibilities of the cascade coordinator will still be fully executed by either the required Operator, the required Plant Shift Superintendent (PSS), or another individual. USEC mentions the use of production process operators (PPOs) as a possibility. USEC also states that the Assistant PSS (APSS), who is also required to be present on-site at all times, will be cross-trained to provide relief to the PPO in filling the cascade control function as needed. To reflect this aspect of the APSS' duties, a new footnote 9 is added to document that the "APSS may provide temporary relief to X-300 assigned operator."

These changes in the staffing requirements will provide USEC more flexibility in staffing, consistent with the greatly reduced level of cascade activity since enrichment operations were terminated, and will have no negative effect on plant safety.

USEC states that the cascade UF6 inventory is now less than 1% of the plant capacity inventory, which is used as the basis of the PORTS accident analysis. USEC also states that the process gas pressure resulting from cell treatments to remove uranium deposits are all below atmospheric pressure. Therefore, any leaks that developed would result in in-leakage. Also, the risks of criticality accidents are greatly reduced due to the reduced UF6 inventory, cell buffering, and the greatly reduced potential sources of moderation from recirculating cooling water and lube oil systems no longer operating. The risk of fire, exothermic reaction, or explosion, is also greatly reduced due to the reduction in the amount of rotating equipment (compressors), coolant (freon), and UF6. Given USEC's commitment to provide trained staffing as needed to carry out the function of the cascade coordinator, as needed, the staff has no objection to granting USEC's amendment request, as it will have no negative effect on overall plant safety in view of the greatly curtailed cascade activity.

## ENVIRONMENTAL REVIEW

Issuance of the requested amendment to Certificate of Compliance GDP-2 is subject to the categorical exclusion provided in 10 CFR 51.22©)(19) and will not have a significant impact on the human environment. Therefore, in accordance with 10 CFR 51.22.b, neither an environmental assessment nor an environmental impact statement is required for the proposed action.

## CONCLUSION

Based on its review and evaluation of the information provided by USEC in its CAR of February 1, 2006, the Nuclear Regulatory Commission staff finds that the proposed revisions to PORTS TSRs 3.1.4 and Table 3.2.2-1 provide adequate protection of public health, safety and safeguards, and concludes that they are acceptable, consistent with the requirements of 10 CFR Part 76, and should be approved.

### Principal Contributor

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ENCLOSURE 2

Certificate of Compliance