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STONE & WEBSTER

Ms. Melanie Galloway
Chief, Technical Support Group
U. S. Nuclear Regulatory Commission
11545 Rockville Pike
Rockville, MD 20852-2738

27 April 2006

DCS-NRC-000187
Response Required: No
Response Due: N/A

SUBJECT: Fuel Cycle Facility Performance Indicator (PI) Program

REFERENCE: Letter, Melanie Galloway, NRC to Dealis Gwyn, DCS, 6-Feb-06, same subject

Dear Ms. Galloway:

DCS appreciates the opportunity to provide input into the development of the Fuel Cycle Facility Performance Indicator (PI) Program. At this point, however, we believe that it is too early in the licensing process to discuss specifics relative to the Mixed Oxide Fuel Fabrication Facility (MFFF). One of the key inputs in developing MFFF performance based, risk informed PIs is the completion and NRC acceptance of the Integrated Safety Analysis Summary. Current plans are for DCS to submit the Integrated Safety Analysis Summary to the NRC in the third quarter of this calendar year which, upon acceptance for review by the NRC, will initiate the NRC technical review process. We expect that the NRC's evaluation and review of our License Application and Integrated Safety Analysis Summary, along with interactions with DCS, would result in the identification of potential MFFF risk-informed, performance based PIs. Although we are not prepared to formally propose any particular PIs at this time, it is reasonable to expect an MFFF ventilation system related PI since:

- our facility will handle plutonium
- confinement of plutonium is a key aspect of our safety strategy
- the ventilation system is important to successful confinement strategy.

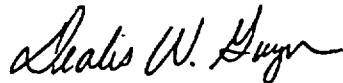
In the development of the PI program, we believe that the majority (if not all) of the PIs should be facility specific. Even if there is commonality between fuel facilities on some of the PIs, we would also suggest that facility specific thresholds for NRC oversight are appropriate since facilities differ in such factors as complexity, capacity, material limits, numbers and types of Items Relied on for Safety (IROFS), and types of hazards.

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PIs will be a visible, prioritized focus of the facility owners and management, workers, and the NRC. The greatest benefit that would be derived from a PI program would be to have clear and reasonable linkages between the PIs and risk-significant aspects of the facility. It is anticipated these facility aspects would be consistent with the MFFF's focus and priorities. As such, it is important that DCS continue to be involved with the NRC on the development of MFFF PIs to facilitate mutual agreement on the types of PIs that would be consistent with this goal. The most effective and efficient way to accomplish this goal is to use the Integrated Safety Analysis Summary along with the MFFF License Application, 10 CFR 70 regulations, and interactions with the NRC as the basis for MFFF specific PIs and PI thresholds. DCS looks forward to the opportunity to work with the NRC in the development of MFFF PIs and PI thresholds.

If you have any questions, please call me at 803-643-2162.

Sincerely,



Dealis W. Gwyn
Licensing & Regulatory Compliance Manager

DWG:gdh

cc: William Gloersen, USNRC/RI
David Tiktinsky, USNRC/HQ
Garrett Smith, USDOE/NA-261
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