From: Brian Smith
To: internet:minerp@usec.com
Date: 5/26/06 12:26PM
Subject: FYI: proposed license conditions

See attached, for discussion during our call today.

CC: Christopher Tripp; James Downs; Linda Williamson; Melanie Galloway; Stan Echols

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Subject: FYI: proposed license conditions
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USEC Teleconference–May 26, 2006
NCS Proposed License Conditions

1. "For any changes to the accident sequences in the ISA Summary, or the addition of any new accident sequences to the ISA Summary, USEC shall address and document the following considerations in the ISA Summary: (1) The accident sequence will specify whether the event is characterized by a frequency of occurrence or by a probability of failure on demand, and will perform all necessary mathematical operations appropriate to the type of event. (2) The accident sequence will distinguish between frequencies and probabilities applicable to a single item and those applicable to a population of identical items; (3) The accident sequence will take demand rates into consideration, for all items characterized by a failure on demand; (4) The applicant will justify independence for any combination of repeated events, or else reduce the assigned likelihood of the combined failure to conservatively bound common-mode failures; and (5) The accident sequence will evaluate whether less reactive physical conditions could lead to a higher likelihood of criticality.

   "This condition shall apply to all criticality safety sequences regardless of whether NRC approval is required under 10 CFR 70.72."

2. "Prior to implementing changes to processes based on calculations requiring extension to the validated area of applicability as described in the validation report referenced in License Application Section 5.4.5.2, USEC shall obtain prior NRC review and approval. The written application shall include a description of the change, the reason that such a change is needed, and the method used to extend the area of applicability."

3. "Use of the 'natural and credible course of events' or 'other means' in lieu of specific administrative or engineered controls for double contingency protection shall require prior NRC review and approval. The written application for such use shall include a justification of why administrative or engineered controls are not practical, a description of the proposed measures in sufficient detail to permit an understanding of their safety function, and a demonstration of how they meet the double contingency principle."

4. "Use of portable criticality accident alarm system (CAAS) as described in Section 5.4.4.1 of the license application shall be limited to fissile material operations less than 24 hours in duration.

   "If fissile material operations in an area without a permanently installed CAAS is required to exceed 24 hours, all personnel not directly involved in the affected operations, or otherwise required for the safety or security of the facility, shall be banned from an area within 65 feet of the fissile material until the operations are concluded. In addition, affected operations shall be terminated as soon as safely achievable."

5. "Section 5.4.5.2 of the license application notwithstanding, USEC shall use a minimum margin of subcriticality of 0.05 in k_{eff} for normal case calculations supporting processes that are not under moderation control."