



AIR 07-102

STATE OF WASHINGTON  
DEPARTMENT OF HEALTH

OFFICE OF RADIATION PROTECTION

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TDD Relay Service: 1-800-833-6388

January 9, 2007

Mr. Loren Maas, Manager  
Licensing and Compliance  
AREVA NP Inc.  
2101 Horn Rapids Road  
Richland, Washington 99352

Dear Mr. Maas:

Reference 1: Letter, L.J. Maas to R.A. Danielson; *Report of Closure*, November 13, 2006

Reference 2: Letter, A. W. Conklin to L.J. Maas; AIR 06-903 September 12, 2006.

Reference 3: Letter, L.J. Maas to A. W Conklin, "Elimination of Two Emission Units (Stacks) as Framatome ANP, Inc.'s (FANP) Richland Fuel Manufacturing Facility; Radionuclide Air Emissions License AIR-907 February 9, 2006.

We request further clarification of information AREVA supplied to support revision of licenses for the K-9 and K-31 emission units as required in Reference 2. Potential-to-emit (PTE) and APQ information provided in your Reference 3 letter seems to conflict with that provided in pre and post closure CAP-88 runs attached to Reference 1. Annual possession quantities (APQs) provided as inputs for CAP-88 runs in Reference 1 differ from those provided in Reference 3 as shown in the Table below.

**Table 1: Comparison of APQs**

APQ - February 9, 2006 - Reference 3				APQ - November 13, 2006 CAP-88 Runs - Reference 1			
K-9 Stack		K-31 Stack		K-9 Stack		K-31 Stack	
Nuclide	Curies	Nuclide	Curies	Nuclide	Curies	Nuclide	Curies
U-232	2.14E+00	U-232	1.07E+00	U-232	None	U-232	None
U-234	7.44E+03	U-234	1.40E+03	U-234	8.70E-07	U-234	8.70E-07
U-235	2.57E+02	U-235	4.28E+01	U-235	3.20E-08	U-235	3.20E-08
U-336	9.37E+01	U-336	4.19E+01	U-336	1.80E-09	U-336	1.80E-09
U-238	7.58E+02	U-238	1.26E+02	U-238	9.50E-08	U-238	9.50E-08



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Our confusion arises from the differences in supplied APQs, the omission of U-232 as an emitted radionuclide and lack of a PTE output to support that cited in the Reference 3 letter. Please provide us with corrected pre and post closure APQs, including quantities of all trace radionuclides, and a pre and post closure PTEs sufficient to support your Reference 3 submittal.

This information is necessary to complete license revisions for these emission units and should be received by the department no later than January 31, 2007.

Should you have questions regarding this transmittal, please contact Mr. Allan Danielson at (509) 727-0645 or Jack Culmer at (509) 946-0790.

Sincerely,

A handwritten signature in black ink, appearing to read "John Martell for". The signature is cursive and somewhat stylized.

John Martell, Manager  
Radioactive Air Emissions Section

cc: Kristin Schwab, DOH - Radioactive Materials Section  
Aine Grumbles, DOH - Radioactive Materials Section  
Douglas M. Collins, USNRC Region II