



April 20, 2007  
REL:07:016

U.S. Nuclear Regulatory Commission  
Director, Office of Nuclear Material  
Safety and Safeguards  
Attn: Document Control Room  
Washington, D.C. 20555

Gentlemen:

**Subject: Request for Clarification for AREVA NP Inc.'s Site-Wide Integrated Safety Analysis Summary Review (TAC L31856)**

AREVA NP Inc. has received your letter dated April 10, 2007 requesting a clarification pertaining to "Mitigative Items Relied on for Safety" (IROFS). Specifically, you requested AREVA to state whether or not mitigative IROFS were capable of mitigating the accident consequences to below the 10CFR 70.61 performance requirements.

When mitigative IROFS are used, they are expected to mitigate the consequences of the initiating event such that the consequences are below the 10CFR 70.61 performance requirements. The level of confidence that the IROFS will perform as expected (mitigate to low consequence levels) is indicated by the Probability of Failure on Demand (PFOD) index number assigned to the IROFS. For example a mitigative IROFS with a PFOD=-1, is expected to successfully mitigate to low consequences 90% of the time. A mitigative IROFS with a PFOD=-2 is expected to successfully mitigate to low consequences 99% of the time.

AREVA has conducted the ISA according to the NRC approved ISA plan and believes that all mitigative IROFS used at the Richland facility are capable of mitigating the accident consequences to below the 10CFR 70.61 performance requirements with the reliability indicated by the assigned PFOD and therefore does not anticipate a revision to the ISA Summary to address this issue.

If you have questions about this response, or other aspects of the AREVA ISA program please contact me on 509-375-8409 or Cal Manning on 509-375-8237.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Robert Link', with a stylized flourish at the end.

R. E. Link, Manager  
Environmental, Health, Safety, & Licensing

**AREVA NP INC.**

An AREVA and Siemens company

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cc: U.S. Nuclear Regulatory Commission, Region II  
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