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DOCKET: 70-1201

LICENSEE: AREVA NP, Inc.
Lynchburg, VA

SUBJECT: SAFETY EVALUATION REPORT FOR AMENDMENT 11- APPROVAL OF
REVISION 18 OF THE FUNDAMENTAL NUCLEAR MATERIAL CONTROL
PLAN FOR SNM-1168 (TAC L31964)

BACKGROUND

By cover letter dated December 20, 2005, AREVA NP, Inc. submitted Revision 18 of its Fundamental Nuclear Material Control (FNMC) Plan. The submittal included an attachment describing the changes made in the FNMC Plan (Attachment 1) and the FNMC Plan in its entirety with a new effective date and revision number. Revision 18 to the FNMC Plan was submitted under the provisions of 10 CFR 70.32(c)(1)(iii), which does not require NRC approval prior to implementation for changes that result in no decrease in effectiveness of the licensee's material control and accounting (MC&A) program.

DISCUSSION

The revision to the FNMC Plan describes two changes to Chapter 4, both of which appear on Page 4-3. The NRC staff reviewed the changes and agree that the changes do not decrease the effectiveness of the approved MC&A program.

The NRC staff noted that the description of the changes made for the item W-1, as presented in Attachment 1, does not match the actual text on Page 4-3 of Revision 18. Because the key part of the revision for W-1 on Page 4-3 is consistent with what is described in Attachment 1 (the scale now has a maximum capacity of 10 kilograms, rather than 500 grams), the discrepancy has no bearing on the licensee's revision to the FNMC Plan with respect to 10 CFR 70.32(c)(1)(iii). Additionally, in a September 18, 2006, telephone call the Project Manager discussed the discrepancy between Attachment 1 and Revision 18 to the FNMC Plan with the licensee. The licensee confirmed that the text in Revision 18 to the FNMC Plan is correct, and that Attachment 1 is incorrect.

Enclosure 2

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The revisions to the FNMC Plan are as follows:

Chapter 4 MC&A Measurement and Measurement Control

The two revisions on Page 4-3 involve mass determinations.

- 1) The revision in description for W-1 reflects a change from a scale with a maximum capacity of 500 grams to a scale with a maximum capacity of 10 kilograms. However, as mentioned above, there is a discrepancy with this revision between the attachment describing the change (which discusses boxes) and the actual text on Page 4-3 (which discusses plastic bags). The licensee has verified that the text in Revision 18 to the FNMC Plan is correct.
- 2) The revision in description for W-2 reflects a change from discussing the tare weight of the box and packing materials to discussing the tare weight of the plastic bags (and this is consistent with the W-1 revision text now found on Page 4-3, rather than in the attachment).

ENVIRONMENTAL PROTECTION

The staff has determined that the revisions to the FNMC Plan are primarily procedural in nature, with one revision resulting in a change in the scale used to conduct measurements. 10 CFR 51.22(c)(11) allows for a categorical exclusion if the following requirements have been satisfied:

- (i) There is no significant change in the types, or significant increase in the amounts of any effluents that may be released offsite;
- (ii) There is no significant increase in individual or cumulative occupational radiation exposure;
- (iii) There is no significant construction impact; and
- (iv) There is no significant increase in the potential for, or consequences from radiological accidents.

The changes made in Revision 18 of the FNMC Plan do not pose a significant change or increase in the parameters (i) through (iv) identified above. There are no changes in the types of or increases in the amounts of effluents. Occupational exposure is expected to remain the same. These changes involve no additional construction activity. The potential for and consequences from radiological accidents are expected to be the same.

Based on this evaluation, there is no significant impact to the environment and the action creating Revision 18 of the FNMC Plan is eligible for categorical exclusion. Therefore, in accordance with 10 CFR 51.22(c)(11), neither an Environmental Assessment nor an Environmental Impact Statement is required for this action.



CONCLUSION

The staff found that the changes made in Revision 18 of the FNMC Plan are not inconsistent with the regulatory requirements in Subpart C of 10 CFR Part 74. The staff concluded that the changes to the facility's FNMC Plan meet the requirements of 10 CFR 70.32(c)(1)(iii) in that they do not decrease the effectiveness of the MC&A program, or the measurement control program, implemented pursuant to 10 CFR 74.31(b), and that the revised FNMC Plan continues to provide an effective MC&A program at AREVA-NP Lynchburg.

Thus, the existing license Safeguards Condition SG-1.1 should be reissued to reflect the current FNMC Plan as follows:

- SG-1.1 The licensee shall follow Chapters 1.0 through 9.0 of its "Fundamental Nuclear Material Control Plan," Revision 18, dated December 20, 2005. This Plan may be further revised in accordance with, and pursuant to, the provisions of either 10 CFR 70.32(c) or 70.34.

PRINCIPAL CONTRIBUTORS

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