

[REDACTED]

November 1, 2004

Ms. B. Marie Moore, Vice President
Safety and Regulatory
Nuclear Fuel Services, Inc.
P.O. Box 337, MS 123
Erwin, TN 37650

SUBJECT: REVISIONS TO EMERGENCY PLAN (TAC L31833)

Dear Ms. Moore:

I am responding to your correspondence dated June 8, 2004, by which your facility submitted Revision 8 to your Emergency Plan (Plan). We have completed our review of the submitted changes, and have determined that these changes do not decrease the effectiveness of the Plan, and thus were properly submitted under the provisions of 10 CFR 70.32(i). Accordingly, the changes to your Plan are acceptable, and Safety License Condition S-24 of your Materials License SNM-124 will be updated in a future license amendment to reflect the current changes. While the changes in this revision do not appear to decrease the effectiveness of the Plan, there are several comments that should be addressed in the next revision (Enclosure).

Please reference the above TAC No. in future correspondence related to this request.

If you have any questions regarding this matter, please contact me at (301) 415-8098 or via e-mail to jao@nrc.gov.

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

B. M. Moore

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[REDACTED]

Sincerely,

/RA/

Julie Olivier, Senior Project Manager
Fuel Cycle Facilities Branch
Division of Fuel Cycle Safety
and Safeguards
Office of Nuclear Material Safety
and Safeguards

Docket No.: 70-143
License No.: SNM-124

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Julie Olivier, Senior Project Manager
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OFC	FCFB		FCFB		FCFB		FCFB	
NAME	J. Olivier		D. Ayres		J. Muszkiewicz		J. Lubinski	
DATE	10/29/04		10/7/04		10/29/04		11/1/04	

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Comments on Review of NFS Emergency Plan Revision 8

The changes in this revision do not appear to decrease the effectiveness of the Plan. However, having said that, there are several comments that should be addressed. They fall into three general categories:

1. corrections or clarifications that need to be made,
2. changes that were not included in the list of changes and/or not marked with revision bars, and
3. some editorial items that should be corrected at some future point.

Comments that fit in the first category (i.e., corrections or clarifications that need to be made), are:

1. The statement on page 2-3 (Section 2.1.2) that a dose of 2 rem TEDE "would not require protective action measures in accordance with EPA Protective Action Guidelines" is inconsistent with Table 5-2 on page 5-18. The EPA recommends protective actions be considered when the projected dose exceeds 1 rem (EPA 400-R-92-001, section 2.3.1).
2. The discussion in the first paragraph on page 2-5 stating that chemical toxicity is "of low consequence" does not seem consistent with the [REDACTED] uranium chemical toxicity "dose" in Table 2-3.
3. On page 2-6, Table 2-3, in the third row [REDACTED], the "REDE" in the radiological dose column needs to be changed to "TEDE" or "CEDE" as appropriate.
4. In the same table, in the last column of the last row, it would seem that "Possible renal (kidney) injury" should be "No immediate effect."
5. Also on page 2-6, Table 2-3, there is no indication as to why "inhalation" is included in the uranium toxicity column in the last row.
6. On page 2-11, Table 2-6, it would seem that the blocks containing "- Reference worst case dose" should actually contain the appropriate dose value or an indication of the accident scenario [REDACTED].

The second category of comments (i.e., changes not noted or marked) includes:

1. The entry in the Record of Revisions for Section 4.0 actually seems to apply to all of Chapter 4, instead of just Section 4.0.
2. In section 2.2.1 the last sentence was deleted but this was not reflected in the Record of Revisions and was not marked with a revision bar.
3. Figure 4-1 was changed, but no revision bar was placed in the margin.

Enclosure

[REDACTED]

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4. Additionally, some changes in Chapter 4 are not marked with revision bars (e.g., pp 4-7 through 4-9, the parenthetical note regarding assuming ECD duties was revised and not marked, deletion of Vice President Operations was not marked).

The third category of comments (i.e., editorial comments) includes:

1. The acronym for the Radiation Emergency Assistance Center/Training Site (REAC/TS) is correct in the letter from DOE included in the Appendix, but is incorrectly typed as REACT/S throughout most, if not all, of the rest of the Emergency Plan.
2. In Section 2.1.8, it appears that "Director's" (possessive) should be Directors (plural).