

September 28, 2006

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

SUBJECT: NUCLEAR FUEL SERVICES, INC., REQUEST FOR ADDITIONAL INFORMATION  
FOR REQUEST TO INCORPORATE CHANGES TO CHAPTER 3 OF SNM-124  
(TAC L31939)

Dear Ms. Moore:

This letter is in response to your submittal dated March 10, 2006, requesting an amendment to incorporate changes to Chapter 3 of SNM-124 (NFS-21G-06-0035). Our review has identified that additional information is needed before your request can be approved. The required additional information, specified in the enclosure, should be provided within 60 days of the date of this letter.

Please reference the above Technical Assignment Control number in any future correspondence related to this request.

If you have any questions concerning this letter, please contact me at (301) 415-8139, or via e-mail to [mxl2@nrc](mailto:mxl2@nrc).

Sincerely,

/RA/

Michael A. Lamastra, 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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[Redacted]

Request for Additional Information  
Nuclear Fuel Services, Inc.

1. In Section 3.1.2 "Radiation Work Permit Program" you requested that the Radiation Work Permit (RWP) be required for non-routine activities, **only if** certain criteria are met. However, in order to meet the requirements of 10 CFR Part 20.1101(b) "Radiation Protection Program," ...that each licensee shall prepare procedures... . To achieve occupational doses ALARA, all activities within a restricted area should either be performed under a RWP or by standard procedure. However, we do agree that the radiation protection officer should be allowed to wave the RWP requirement, in writing, if in his opinion the stated criteria are met.
2. In Section 3.2.1 "Contamination Control Program," you removed the stated action levels and indicated that the action levels are incorporated into procedures. This commitment is insufficient and does not meet the requirements of 10 CFR Part 20.1101. In order to meet the requirements of 10 CFR Part 20.1101, you should either state specific actions levels, or commit to following the guidance of industrial standards or Regulatory Guides.
3. In Section 3.2.6 "Surface Contamination," you removed the stated action levels and indicated that the action levels are incorporated into procedures. This commitment is insufficient and does not meet the requirements of 10 CFR Part 20.1101. In order to meet the requirements of 10 CFR Part 20.1101, you should either state specific actions levels, or commit to following the guidance of industrial standards or Regulatory Guides.
4. The current requirement in Chapter 3, Section 3.2.4.3 states that alarm system testing will be performed at least once per month using a rotational basis for individual units. It also states that each detector is source checked on a semi-annual basis. The request for change to this section states that alarm system testing will be performed in accordance with approved procedures.

Please provide additional discussion that supports the reason for the change in the following areas:

- a. The current license requirement for alarm system testing provides detailed information regarding the periodic testing, whereas the proposed amendment provides only a commitment to perform testing in accordance with approved procedures. Also, guidance on alarm system testing in ANSI/ANS 8.3 only requires that testing be performed periodically with no specific frequency provided. What would be the frequency of alarm system testing be based in the proposed amendment and where would this commitment be provided? How is this commitment to test the alarm system currently described in procedures?

Enclosure

[REDACTED]

What administrative controls are in place to assure that testing will be performed in an acceptable frequency? Why does reference to the procedures in the license application provide an acceptable means of maintaining the testing commitment?

- b. The current license requirement for detector source checking provides detailed information regarding the periodic testing, whereas the proposed amendment provides no commitment to perform detector source checking. Also, guidance on the frequency of detector source checking is not addressed in detail in ANSI/ANS 8.3. Would the proposed amendment result in any change to the frequency of detector source checking? What commitment would be provided to assure acceptable detector source checking and where would the commitment be provided? What administrative controls are in place to assure that detector source checking will be performed in an acceptable frequency?

[REDACTED]

Enclosure