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May 23, 2005

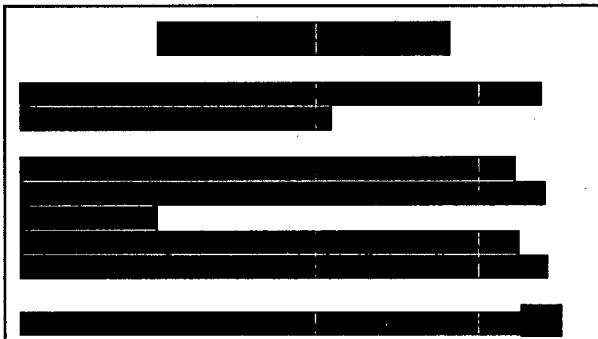
Ms. B. Marie Moore, Vice President  
Safety and Regulatory  
Nuclear Fuel Services, Inc.  
P.O. Box 337, MS 123  
Erwin, TN 37650

SUBJECT: NUCLEAR FUEL SERVICES, INC., REQUEST FOR ADDITIONAL  
INFORMATION CONCERNING CHANGES TO CERTAIN ADMINISTRATIVE  
PROGRAMS (TAC L31862)

Dear Ms. Moore:

This refers to your letter dated December 3, 2004 (NFS No. 21G-04-0161), concerning changes to certain administrative programs. Our review has identified that additional information is needed before your request can be approved. The additional information, specified in the enclosure, should be provided within 30 days of the date of this letter. Please reference the above TAC No. in future correspondence related to this request.

If you have any questions concerning this letter, please contact me at (301) 415-7887 or via e-mail to [kmr@nrc.gov](mailto:kmr@nrc.gov).



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B. M. Moore

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Sincerely,

/RA/

Kevin Ramsey, 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

Enclosure: Request for Additional Information

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B. M. Moore

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Enclosure: Request for Additional Information

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ML051460573

OFC	FCFB		FCFB		TSG		FCFB	
NAME	K. Ramsey		B. Garrett		M. Galloway		J. Lubinski	
DATE	05/10/05		05/10/05		05/20/05		05/23/05	

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Request for Additional Information  
Concerning the Changes to Administrative Programs for Nuclear Fuel Services, Inc. (NFS)  
Proposed in the Letter dated December 3, 2004

1. The submittal requests deleting Condition S-40 from License SNM-124 and deleting Section 1.7.21 from the NFS license commitments. These changes would delete the definitions of Safety Related Equipment (SRE) and Configuration Control Equipment (CCE) and remove requirements for related management measures. The basis for this request is because the definitions of SRE and CCE are bounded by the description of items relied on for safety (IROFS) in your Site-Wide Integrated Safety Analysis (ISA) Summary. However, during a conference call on April 27, 2005, you informed us that the SRE/CCE program is used to identify and control both IROFS and non-IROFS equipment. You stated that you intend to continue using the SRE/CCE program in this manner. It is unclear whether sufficient steps have been taken to avoid confusion and continue safety at your facility if SRE/CCE requirements are deleted, while the SRE/CCE program is still used extensively at your facility. Please explain where the SRE/CCE program requirements will be documented and why we should have confidence that these changes will not reduce the safety of your program.

This information is required to verify compliance with 10 CFR 70.62(b), which requires each license to maintain process safety information including, in part, information pertaining to equipment in the process.

2. The submittal requests changing Section 2.4 of the NFS license commitments to extend the period for the Safety Review Committee to review the accuracy of operating procedures from two years to five years. The basis for this request is the guidance in NUREG-1520 that operating procedures should be reviewed at least every five years. We note that the guidance in NUREG-1520 applies to a wide range of fuel cycle facilities, including facilities processing much lower enrichments. The general guidance in NUREG-1520 does not provide a sufficient basis for extending the review period to five years for the high-risk operations conducted at your facility. We recognize your desire to resolve a conflict between the 2-year review specified in Section 2.4 and the 5-year review specified in Section 2.12.4.2. Please provide site-specific information, such as the result of previous reviews, that justifies a longer review period.

This information is required to make the finding specified in 10 CFR 70.23(a)(4), which states that the applicant's proposed procedures to protect health and to minimize danger to life or property are adequate.

3. The submittal requests changing Section 2.12.1.5 of the NFS license commitments to extend the period for assessing the configuration management function at NFS from two years to five years. The basis for this request is the change control provisions in

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Section 2.12.4 and Condition S-25 that require detailed review of any changes to the site, structures, processes systems, equipment, components, computer programs, and activities of personnel. We note that site operations have experienced significant changes recently, with new facilities being constructed and existing facilities being renovated. Also, additional changes are planned and modern technology (i.e., computer software, etc.) can change significantly over two years. The change control process does not provide a sufficient basis for extending the assessment period to five years for the high risk operations conducted at your facility. Please provide site-specific information, such as the result of previous assessments, that justifies a longer review period.

This information is required to make the finding specified in 10 CFR 70.23(a)(4), which states that the applicant's proposed procedures to protect health and to minimize danger to life or property are adequate.