



September 10, 2008
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U.S. Nuclear Regulatory Commission
Director, Office of Nuclear Material
Safety and Safeguards
Attn: Document Control Desk
Washington, D.C. 20555-0001

Gentlemen:

Subject: Request for Additional Information (RAI) Responses Pertaining to General Information and Organization and Administration (Chapters 1 and 2, respectively, of License No. SNM-1227 Renewal Application)

- Ref.: 1. Letter, P.J. Habighorst, "Request for Additional Information Regarding the Safety Evaluation Report for AREVA NP Inc. Richland Fuel Fabrication Facility License Renewal; License No. SNM-1227, Docket No. 70-1257 (TAC L31975)"; July 31, 2008.
- Ref.: 2. Letter, R.E. Link to USNRC Document Control Desk, "Submittal of License Renewal Application and Environmental Report for AREVA NP Inc. Richland Fuel Fabrication Facility; License No. SNM-1227, Docket No. 70-1257," October 24, 2006.
- Ref.: 3. Letter, R.E. Link to USNRC Document Control Desk, "RAI Request dated July 31, 2008 (TAC L31975)"; August 21, 2008.

Via Reference 1, the NRC conveyed RAIs pertaining to a number of chapters in AREVA NP's pending license renewal application for License No. SNM-1227, submitted to the NRC via Reference 2. Via Reference 3 AREVA requested that the due date for submitting all the RAIs be extended to October 3, 2008, however the NRC has now indicated that they would be receptive to AREVA's submittal of RAI responses prior to that date on a chapter-by-chapter basis as they are completed. Accordingly, attached please find AREVA's responses to RAIs pertaining to Chapter 1, General Information, and Chapter 2, Organization and Administration, of the Richland license renewal application.

If you have questions, please contact me on 509-375-8409.

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

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cc: Rafael L. Rodriguez
U.S. Nuclear Regulatory Commission
Fuel Manufacturing Branch, Mail Stop EBB-2-C-40
Division of Fuel Cycle Safety and Safeguards
Office of Nuclear Material Safety and Safeguards
Washington, D.C. 20555-0001

RAI RESPONSES - AREVA NP RICHLAND (SNM-1227); September 8, 2008

Chapter 1: General Information

1. Provide scaled drawings of Figures 1-1, "Fuels Manufacturing Plant Arrangement", and 1-2, "Site General Arrangement", in order to better understand the facility's layout and the descriptions of the different processes conducted at the plant. This information is necessary to determine compliance with the requirements in 10 CFR 70.22(a)(2).

Response:

Figure 1-1 was provided primarily to show the location of the developed Richland industrial site (fenced exclusion area plus surrounding parking areas) in relation to the overall AREVA NP site boundary. Figure 1-2 was provided to show the layout of facilities and processes within the developed site and, as such, is matched via map coordinates to the major site features described in Section 1.1.2. Larger (40" x30") copies of both figures, scaled as noted, are being provided.

2. Justify the requests for each exemption and authorization mentioned in Section 1.2.5 of the license application and how they will not affect the safety of the workers or the facility. This information is necessary to determine compliance with the requirements in 10 CFR 70.22(a)(8).

Response:

The exemptions and authorizations requested in Section 1.2.5 of the application are not new, being already present in the current approved license for the Richland site (SNM-1227) or in two cases, in the approved license for the Richland site's sister facility in Lynchburg (SNM-1168). As requested in a phone call with the NRC reviewer (R. Rodriquez) on September 4, 2008, the approval history, when readily available, for each exemption/authorization is provided below.

➤ Section 1.2.5.1 Plutonium and Other Transuranic Contamination in Feedstock

This authorization is included in Richland's current license, having been approved as Amendment No. 21 on July 11, 2000, "Revision of Limit for Transuranic Contamination in Uranium Feedstock (TAC No. L31343)."

➤ Section 1.2.5.2 Plutonium Contaminated Waste Storage

This authorization is no longer required in that Richland's legacy mixed-oxide waste drums were shipped to Hanford's Waste Receiving and Processing (WRAP) facility on June 24, 2008, for eventual disposal at the Waste Isolation Pilot Plant in Carlsbad, New Mexico. This authorization request will therefore be removed from the application.

➤ Section 1.2.5.3 Labeling Exemption

This exemption to 10 CFR 20.1904(a) labeling requirements is in both the current Richland and Lynchburg licenses. As indicated in the NRC's November 1996 SER for AREVA's (then Siemens Power Corporation's) November 1996 license renewal, this exemption had been in effect in License No. SNM-1227 for the entire term of the previous license as well.

➤ Section 1.2.5.4 Waste Disposal

This authorization is in the Richland site's current license, was addressed in the SER covering the Richland site's November 1996 license renewal, and is consistent with the NRC's October 1981 Branch Technical Position Paper, "Disposal or Onsite Storage of Thorium or Uranium Wastes from Past Operations".

➤ Section 1.2.5.5 Authorization at Reactor Sites

This authorization is more prescriptive than the corresponding authorization in Richland's current license (SNM-1227, Section 1.6.6), has been previously approved as Section 1.5 d) in License SNM-1168 for AREVA's Lynchburg site, and is responsive to the requirements of 10 CFR 50.68 (b).

➤ Section 1.2.5.6 Notification

This exemption is in the Richland site's current approved license (SNM-1227, Sec. 1.6.9). For exposures within restricted areas, AREVA maintains an incident investigation procedure that imposes investigative requirements and diagnostic bioassay follow-up at highly conservative action levels, i.e., exposures judged to be greater than 10 DAC-hrs for Type F material or greater than 100 DAC-hrs for Type M or S material. Notification and reports will be made to the NRC based on confirmed exposure results rather than the hypothetical scenarios in 20.2202(a)(2) and (b)(2), i.e., what an individual "could have received" if the individual "had been present for 24 hours" in the restricted area.

➤ Section 1.2.5.7 Authorized Release Guidelines for Hydrofluoric Acid

This authorization is in the Richland site's current license, having been approved in conjunction with AREVA's (then Siemen's) amendment application dated June 28, 1994 and as supplemented on July 7, 1994. The NRC's FONSI for this action was published in the Federal Register on September 14, 1994 (59 FR 47190). The authorization was affirmed in the NRC's November 1996 SER for the site's November 1996 license renewal.

➤ Section 1.2.5.8 Authorized Release Guidelines for Ammonium Hydroxide

This authorization is in the current Richland site license and was re-approved as Amendment No. 13 to SNM-1227 on September 1, 1998, "UF₆ Cylinder Relocation, Additional Filter Presses, and the Sale of Ammonium Hydroxide (TAC No. L31084)."

➤ Section 1.2.5.9 Material Control and Accounting

This commitment to follow our site Fundamental Nuclear Material Control Plan is technically not an authorization or an exemption. It was inserted as directed by NRC letter of November 21, 2006 (TAC L31975).

➤ Section 1.2.5.10 Physical Protection

This commitment to follow our site Physical Protection Plan is technically not an authorization or an exemption. It was inserted as directed by NRC letter of November 21, 2006 (TAC L31975).

➤ Section 1.2.5.11 Release from Prior Commitments

This administrative clarification is included in the approved license for the Lynchburg site (SNM-1168) and was judged to be a beneficial addition to the Richland license. It is technically not an authorization or an exemption.

3. Section 1.3.2 of the license application provides information about the "current" population in the tri-cities area. However, the license application does not cite the references used by AREVA NP, Inc. (AREVA) to obtain this information. Clarify what are the sources used to obtain this information and how "current" (i.e., year) the information is. This information is necessary to determine compliance with the requirements in 10 CFR 70.9(a).

Response:

The Tri-Cities population data provided in the license application was derived from the Fact Sheet available at that time (2006) on the website for the Tri-City Development Council (TRIDEC). The data in the Fact Sheet on-line in 2006 were 2005 population estimates. The Fact Sheet currently on the website provides 2007 population estimates, as follows: Richland (45,070), Kennewick (62,520), Pasco (50,510), and West Richland (10,850).

RAI RESPONSES - AREVA NP RICHLAND (SNM-1227); September 8, 2008

Chapter 2: Organization and Administration

1. Section 2.2 describes the qualifications for the different organizational responsibilities and functions at the facility. Revise this section in the license application to clarify what is the degree (i.e., bachelor's, masters, etc.) for each one of these functions. For the training function discussed in Section 2.2.7, revise the license application to clarify the degree and discipline required by an individual that is performing this function. This information is necessary to determine compliance with the requirements in 10 CFR 70.22(a)(6).

Response:

Requirements for an educational degree are specified in Section 2.2 for the Site Manager (Sec. 2.2.1); Operations Manager (Sec. 2.2.2); Production Managers (Sec. 2.2.3); and the individuals responsible for the EHS&L function, Nuclear Criticality Safety function, Radiation Protection function, Safety function, Licensing and Compliance function, Plant Projects function, and Training function (Sections 2.2.5, 2.2.5.1, 2.2.5.2, 2.2.5.3, 2.2.5.4, 2.2.6. and 2.2.7, respectively). All of these sections will be revised to reflect that the degree must be a bachelors and/or advanced degree.

The discipline of the degree required for the individual responsible for the Training function is purposefully not specified in that this individual could foreseeably have a wide range of educational backgrounds, e.g. science, engineering, education, communication, etc. AREVA wishes to avoid the likelihood of requiring a license amendment to hire individuals into this position.

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PLANT ARRANGEMENT
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