

December 15, 2008

Mr. Steve Toelle, Director
Nuclear Regulatory Affairs
U. S. Enrichment Corporation
2 Democracy Center
6903 Rockledge Drive
Bethesda, MD 20817

SUBJECT: CERTIFICATE AMENDMENT REQUEST - TECHNICAL SAFETY
REQUIREMENT CHANGE TO REVISE CRITICALITY ACCIDENT ALARM
SYSTEM CONTROLS AT THE PADUCAH GASEOUS DIFFUSION PLANT (TAC
L32478)

Dear Mr. Toelle:

The U.S. Nuclear Regulatory Commission (NRC) staff has reviewed the United States Enrichment Corporation's request for a revision to the Technical Safety Requirement (transmitted by letter, dated November 21, 2008 (GDP-09-0026). On November 28, 2008, the staff accepted your submittal for a detailed review. Review of your request has identified that additional information is needed before final action can be taken on your submittal.

In accordance with Title 10 of the Code of Federal Regulations (10 CFR), Section 2.390 of the NRC's Rules of Practice, a copy of this letter will be available electronically from the Publicly Available Records component of NRC Agencywide Documents Access and Management System (ADAMS). ADAMS is accessible from the NRC Website at <http://www.nrc.gov/reading-rm/adams.html>.

To ensure a timely review please provide the requested information within 30 days of the date of this letter. If you have any questions regarding this action, please contact me at (301) 492-3108, at Michael.Raddatz@nrc.gov.

Sincerely,

/RA/

Michael Raddatz, Sr. Project Manager
Advanced Fuel Cycle
Special Projects and Technical
Support Directorate
Division of Fuel Cycle Safety
and Safeguards
Office of Nuclear Material Safety
and Safeguards

Docket No.: 70-7001,
Certificate: GDP-1

Enclosure: Request for Additional Information

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Request for Additional Information

- CA-1. Page 1 of Enclosure 2 to your November 21, 2008, amendment request includes a statement of change that omits the word “temporary” from the change, to the basis statement, for Technical Safety Requirement (TSR) 2.1.4.5b. The actual change page for this TSR, and the other TSRs affected by the amendment, includes the word “temporary” in describing temporary activities that generate high noise levels. State your intention regarding temporary activities. Also, provide either examples or a time frame commensurate with the duration of such temporary activities.
- CA-2. Section 6.4 of ANSI/ANS-8.3-1997 states that, “The entire alarm system shall be tested periodically. Each signal generator shall be tested at least annually.” However, Section 6.3 of the same standard states that, “System response to radiation shall be measured periodically to confirm continuing instrument performance. The test interval should be determined on the basis of experience. In the absence of experience, tests should be performed at least monthly.” In your description of Criticality Accident Alarm System (CAAS) surveillance, it appears that you are in compliance with Section 6.4 of this standard. However, describe how you are meeting the intent of Section 6.3 of the standard.