

## Kevin Ramsey

---

**From:** Kevin Ramsey  
**Sent:** Thursday, February 19, 2009 2:56 PM  
**To:** FCSS\_Document\_Processing Resource  
**Subject:** Summary of 2/8/09 call w/NFS (L32812)

Please add this message to ADAMS.

On February 18, 2009, a call was conducted with Nuclear Fuel Services (NFS) concerning the acceptance review of an amendment to clarify the requirements for reflection and normal case conditions for criticality safety. The following individuals participated:

Randy Shackelford, NFS  
Rik Droke, NFS  
Kevin Ramsey, NRC  
Chris Tripp, NRC

NRC explained that it is unable to accept the amendment request because it fails to provide the grounds for the amendment as required by 10 CFR 70.34. NFS stated that the amendment request was submitted to fulfill a commitment that NFS made in a response to a violation related to the reflection requirements in the license and that NFS chose the license condition route to address the problem instead of revising Chapter 4 at this time. Although a detailed justification for the request was not provided in the original submittal, the basic reason for the amendment request was stated therein. NFS explained that the existing requirements for the reflection parameter in Chapter 4 of its license are very conservative and often go beyond what is considered credible. However, the requirements provide no flexibility. The requirements for other parameters allow NFS to determine what values are credible. NFS would like the requirements for reflection to allow the same flexibility. NFS noted that licenses issued to other sites allow the licensees to define what conditions are credible.

NRC stated that it would be useful if NFS provided examples of cases where the reflection required by Chapter 4 went beyond credible conditions. NRC noted that the request would relax existing requirements without providing limits or guidance on how reflection will be defined in the future. NRC stated that establishing a framework within which reflection conditions will be defined would help provide a basis for approving the request.

NFS stated that it would prepare additional information explaining the grounds for the request. NRC stated that if the information was submitted by February 27, it could complete its acceptance review by March 16. NFS agreed to a target date of February 27 for the additional information.

Kevin M. Ramsey  
Senior Project Manager  
Fuel Manufacturing Branch  
U.S. NRC  
301-492-3123