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original

January 25, 2008
AET 08-0010

Mr. Daniel H. Dorman, Director
Division of Security Operations
Office of Nuclear Security and Incident Response
ATTN: Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

American Centrifuge Plant
Docket Number 70-7004; License Number SNM-2011
Submittal of Changed Pages of the Emergency Plan for the American Centrifuge Plant

Dear Mr. Dorman:

In accordance with 10 *Code of Federal Regulations* (CFR) 70.32(i), USEC Inc. (USEC) hereby submits changed pages of the Emergency Plan for the American Centrifuge Plant (ACP) as Enclosure 1 of this letter. Revision bars in the right hand margin depict changes from the previous revision submitted to the U.S. Nuclear Regulatory Commission (NRC).

Currently, the NRC-accepted Emergency Plan in effect at the U.S. Department of Energy reservation in Piketon, Ohio is the United States Enrichment Corporation's Emergency Plan, which USEC credited within Chapter 8.0 of the License Application for the Lead Cascade Facility. Changed pages for this site-wide Emergency Plan are currently submitted to the affected off-site response organizations in accordance with 10 CFR 76.91(o) and will remain effective until implementation of the Emergency Plan for the ACP. Upon full implementation of the new site-wide Emergency Plan and in accordance with 10 CFR 70.32(i), USEC will begin supplying changed pages to the affected off-site response organizations through the controlled distribution process.

The changes noted in Enclosure 1 have been reviewed in accordance with 10 CFR 70.72 and has been determined not to require prior NRC approval. This change has also been reviewed in accordance with 10 CFR 70.32 and has been determined not to decrease the effectiveness of the applicable plan.

If you have any questions regarding this matter, please contact me at (301) 564-3470.

Sincerely,

Peter J. Miner
Director, Regulatory and Quality Assurance

Enclosure: As Stated

cc: S. Echols, NRC HQ
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Enclosure 1 to AET 08-0010

Changed Pages of the Emergency Plan for the American Centrifuge Plant

**Does not contain
Export Controlled Information**

**Reviewer: G. Peed
Date: January 24, 2008**

4.0 RESPONSIBILITIES

USEC is responsible for overall direction and control of emergency response activities on the DOE reservation. USEC is also required to provide site-wide emergency response services to the DOE.

4.1 USEC

As described in Chapter 2.0 of the license application, the Senior Vice President is ultimately responsible for the safe operation of USEC activities on the DOE reservation. The General Manager, American Centrifuge Plant Operations is responsible for the day-to-day management of USEC activities on the reservation, including the ERO. The ACP Manager, Enrichment Operations and the GDP Plant Manager are responsible for day-to-day operation of the respective uranium enrichment plants. Administrative and technical support personnel are normally on-site daily, Monday through Friday, holidays excluded. Operational personnel are on duty 24 hours per day. The Plant Services Manager is responsible for maintaining the Emergency Plan.

Per plant procedures, the IC is responsible for making proper notifications of abnormal conditions, determining the severity of the event declaring an emergency, and initiating appropriate response. (The IC duties are assumed by the on-duty PSS.) The IC provides command and control over the specific incident area response based upon input from operations personnel. The IC acts as the on-scene IC and subsequently as the Crisis Manager until relieved by a member of management designated in the Emergency Line of Executive Succession. The General Manager, American Centrifuge Plant Operations, or designee, becomes the Crisis Manager and is authorized to declare an emergency, initiate the appropriate response, and assign a Recovery Manager when emergency conditions no longer exist. (The duties and responsibilities of the Recovery Manager are addressed in Section 9.0 of this plan.)

4.2 On-site Emergency Response Organization

The ERO is responsible for taking immediate mitigative and corrective actions to minimize the consequences of an incident to workers; public health and safety; and the environment. The ERO is staffed with trained personnel who respond to events and are required to participate in training, drills, and exercises. The incident type and severity dictate the level of ERO activation.

The ERO has the following specific functions and responsibilities, depending on the incident and level of response needed to mitigate the problem:

- Event categorization;
- Notification;
- Protective action recommendations;

- Management and decision making;
- Control of on-site emergency activities;
- Consequence assessment;
- Emergency public information;
- Activation and coordination of on-site response resources, security, communications, and administrative support; and
- Coordination and liaison with off-site support and response organizations.

The ERO is divided into the following functional groups: (1) Field ERO, (2) EOC cadre, and (3) Joint Public Information Center (JPIC).

Members of these groups are assigned to response locations and emergency response centers such as the EOC. Emergency assignments correspond, as closely as possible, to daily duties. Primary and alternate personnel are assigned to the ERO positions. Assignments are updated periodically. Management ERO positions in each group provide oversight and final authority in the group's decision-making process.

4.2.1 Direction and Coordination

The initial ERO consists of the appropriate shift personnel with the IC. Upon classification of the emergency as an Alert or SAE, the IC becomes the Crisis Manager and maintains overall control of the reservation during the emergency until relieved. Once the EOC is operational, the General Manager, American Centrifuge Plant Operations, or designee, relieves the IC as Crisis Manager and assumes overall control of the emergency. Additional personnel are called in as needed by the IC, depending on the extent of the emergency.

The IC conducts transition and turnover of command and control authority and responsibility of the Crisis Manager function. A primary and alternates are identified for the Crisis Manager.

The following is the order of succession for the Crisis Manager position:

- Incident Commander
- General Manager, American Centrifuge Plant Operations
- Personnel designated by the General Manager, American Centrifuge Plant Operations and trained and qualified as Crisis Manager

Because of the importance of some emergency responsibilities, these responsibilities may be performed only by the ERO position assigned to address them. The following responsibilities are transferred when the overall responsibility for emergency response is transferred.

6.1 Command Center

6.1.2 Plant Control Facilities

The ACP ACR, located in the X-3012 Process Support Building, provides central operating functions to monitor and control centrifuge operations. The Senior Shift Supervisor directs the operation of systems within the facilities necessary to support the ACP cascade operation and is responsible for accumulation and dissemination of information regarding ACP activities to the IC during emergencies. The Senior Shift Supervisor is responsible for making event notifications during normal operations. This responsibility is initially delegated to the IC when the ERO is activated.

The GDP Plant Control Facility (PCF) located in the X-300 building is used to maintain surveillance and control of GDP operational processes; conduct incident assessment and mitigation; and initially direct protective actions. The PCF contains control instrumentation and communication equipment, required for supervision, direction, and coordination of GDP operations. GDP fire alarms go to the PCF. Sufficient equipment is available to monitor the operating conditions vital to the GDP cascade and power systems. The PSS directs response actions of the PCF staff.

During an emergency, the PSS becomes the IC. (There are two personnel onsite at all times who are qualified to perform the duties of the IC, the PSS and the Assistant PSS. During an emergency one of the PSS's would assume the IC role.) The IC provides command and control over the specific incident area response based on input from operations personnel. Personnel under the direction of the IC are responsible for initially performing the following duties until the EOC is operational:

- Assessing abnormal conditions;
- Activating EOC personnel;
- Making off-site notifications;
- Activating the public warning system, if necessary;
- Performing corrective actions;
- Directing GDP operations; and
- Implementing on-site protective actions.

6.1.3 Command Post

The Command Post is a distinctly marked vehicle or specific area equipped with communications capabilities and other resources required to manage the incident. The

The Emergency Management Training procedure establishes the requirements for the Emergency Management training program. Emergency training requirements for each position are described in the procedure, which includes frequency of retraining.

7.2.3 Off-site Emergency Management Training

Training is offered to emergency support organizations that may be called upon to respond to emergencies at the DOE reservation. These agencies include local fire, law enforcement, ambulance, and hospital services. This training includes the following topics, as a minimum:

- Specific information on hazards; on-site and off-site protective actions; and emergency response from personnel or organizations augmenting the ERO.
- Orientation tours.
- ~~Information briefings for the news media on operational emergencies, specific hazards and responses, points of contact, and procedures for the release of information in the event of an emergency.~~

7.3 Drills and Exercises

Emergency management drills and exercises are conducted to develop, maintain, and test the response capabilities of emergency personnel, facilities, equipment, procedures, and training.

A drill is a supervised instruction session that develops, tests, or maintains a specific emergency response capability using a limited scope scenario. Drills involve decision-making and actions by participating personnel to simulate emergency conditions.

An exercise is a training session that tests the integrated capability of all or most of the basic elements existing within the emergency plan and procedures. Exercises use scenarios that are wider in scope than drills and may involve off-site response personnel and agencies.

Persons trained in the control and evaluation of drills conduct drills and exercises. Controllers are assigned to various locations if a drill or exercise involves simultaneous activities at more than one location. Evaluators are provided with criteria to evaluate the performance of participants.

The Fire Safety/Emergency Management Manager, who reports to the Plant Services Manager, is responsible for implementing a coordinated program of emergency drills and exercises identified in a procedure. Procedures require emergency management to promulgate a drill and exercise schedule, which identifies drill/exercise category, shift/group, and tentative dates. Management personnel are responsible for ensuring that employees under their oversight are available to participate in drills and exercises. Personnel are required to participate in drills and exercises in a safe and realistic manner.