

Theavy Newman-Richmond

From: LINK Robert (AREVA NP INC) [Robert.Link@areva.com]
Sent: Thursday, March 05, 2009 12:21 PM
To: Rafael Rodriguez
Cc: MaryLynne Thomas; MAAS Loren J (AREVA NP INC); PERKINS Charles J (AREVA NP INC); LAND Ron J (AREVA NP INC)
Subject: Compliance Plan

As we discussed this morning we have completed our gap analysis of the final revised license renewal application to identify any issues with regard to "day one" compliance with the new license conditions. Our original concern was that with the changing commitments to the new license we may have had to have some "grace" period to get the new requirements implemented.

Our review has resulted in a conclusion that a compliance plan will not be needed. While we need to modify some of our programmatic procedures (Crit and Rad) we can go ahead with those revisions now in anticipation of the approval with no conflicts identified. For the improved commitments regarding audits and assessments we intend on phasing those in within the periodicity term allowed in the proposed application. That is, for audits that have a 1 year term of periodicity we will phase them in during the first year of the license term to initiate their routine of performance. For the assessments which carry a three year term we will similarly phase them in during the first three years of the renewed license.

We believe this meets both the letter and intent of these commitments, therefore not requiring any exceptions to the license conditions starting day one of the renewed license.

We appreciate your consideration of this matter.

Bob Link
Manager EHS&L , Richland

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