

March 18th, 2009

Office of Nuclear Materials Safety and Safeguards U.S. Nuclear Regulatory Commission Attn: Document Control Desk One White Flint North 11545 Rockville Pike Rockville, MD 20852-2738

Subject: Response to Request for Additional Information (RAI) Relative to Possession at Utilities for the Purpose Transport and the Scope of the Authorized Radiation Protection Program

Attachment: RESPONSE TO RAI RELATIVE TO POSSESSION OF AREVA NUCLEAR SERVICES EQUIPMENT AT SITES AND SCOPE OF AUTHORIZED RADIATION PROTECTION PROGRAM REGARDING SNM-1168 AMENDMENT REQUEST FOR CHEMISTRY SERVICES LABORATORY

Dear Mr. Thompson,

Please find attached the RAI with responses relative to site possession and the radiation protection program scope.

Per our telephone conversation on March 17th, responses discussed are provided as attachment.

Should you have any questions regarding this submittal, please call me at (434)-832-5205.

Sincerely,

Samuel E. Miller Manager, Environmental, Health, Safety and Licensing

AREVA NP INC. An AREVA and Siemens company

ATTACHMENT

RESPONSE TO RAI RELATIVE TO POSSESSION OF AREVA NUCLEAR SERVICES EQUIPMENT AT SITES AND SCOPE OF AUTHORIZED RADIATION PROTECTION PROGRAM REGARDING SNM-1168 AMENDMENT REQUEST FOR CHEMISTRY SERVICES LABORATORY

 [NRC] In accordance with 10 CFR 20.1101, clarify the nature and limits of operations involving contaminated equipment at utility sites proposed under this license amendment. If this involves utilizing equipment off-site as part of operations, provide sufficient details of the operations and applicable radiation protection program to assess the adequacy of the program.

AREVA Response:

The authorization to take possession of AREVA services equipment at sites is solely for the purposes of transportation such that AREVA can become shipper of record from a particular site. Equipment will not be used under this authorization; all equipment usage is under a particular site's specific radioactive material program. Possession takes place only after equipment has been repackaged and is ready for transport.

A similar authorization is currently in place for the return of unirradiated fuel assemblies from nuclear reactor facilities back to AREVA [Chapter 1, Section 1.5, d) of the License Application].

The intent of this authorization is to have an option regarding transportation "shipper of record" for nuclear services shipments from nuclear reactor facilities.

2. [NRC] In accordance with 10 CFR 20.1101, clarify that the existing radiation protection program approved for SNM-1168 will be extended to the new CSL building and the operations that will occur in it.

AREVA Response:

The existing radiation protection program is applied site-wide and will include the CSL and its associated operations.

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AREVA NP INC.