

MFFFNPEm Resource

From: Tiktinsky, David
Sent: Wednesday, June 17, 2009 8:50 AM
To: Gwyn, Dealis W.
Cc: MFFFHearingFile Resource; Morrissey, Kevin; Roman, Cinthya; Kotzalas, Margie
Subject: FW: 06-16-09 MOX Emergency Evaluation Response to RAIs.doc
Attachments: 06-16-09 MOX Emergency Evaluation Response to RAIs.doc

[For tomorrows meeting.](#)

From: Bartlett, Matthew
Sent: Tuesday, June 16, 2009 1:53 PM
To: Tiktinsky, David; Morrissey, Kevin
Subject: 06-16-09 MOX Emergency Evaluation Response to RAIs.doc

Here are the basic questions I hope to have clarified by the discussion with MOX on Thursday. They are not currently written in standard RAI format as they are draft for discussion. Potentially they could be provided to MOX in advance, if you believe a preview would facilitate resolution.

Issues 1 and 2 are the most important, 3-6 aren't crucial.

Thanks,

Matt Bartlett

P.S. Can either of you provide me with formatting guidance for writing an Emergency Evaluation? I hope to look at the AREVA Lynchburg example. Other than that old document, I am not aware of other examples.

Hearing Identifier: MixedOxideFuelFabricationFacility_NonPublic
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Subject: FW: 06-16-09 MOX Emergency Evaluation Response to RAls.doc
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From: Tiktinsky, David

Created By: David.Tiktinsky@nrc.gov

Recipients:

"MFFFHearingFile Resource" <MFFFHearingFile.Resource@nrc.gov>
Tracking Status: None
"Morrissey, Kevin" <Kevin.Morrissey@nrc.gov>
Tracking Status: None
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Post Office: HQCLSTR02.nrc.gov

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MOX Emergency Evaluation Response to RAIs
06-16-09

Matt Bartlett MOX Emergency Evaluation Reviewer

1. A primary factor which supports an Emergency Evaluation (EE) for this major fuel facility in accordance with Part 70.22i1i is the location of the site boundary 5.5 miles from the MOX facility. The extensive boundary for the Mixed Oxide Fuel Fabrication Facility (MFFF) is due to its location on the SRS reservation which has controlled boundaries and access. However, there are a significant number of individuals within this boundary which are not directly employed by MFFF. As such, the EE must provide a basic description of the MOU, i.e., emergency coordination plans, between the applicant, the SRS emergency response organizations, and the state and local officials. This basic description should demonstrate emergency planning including:
 1. An established emergency contact procedure between MFFF, SRS, and the local and state officials, e.g., contact numbers, names, order of contact, predetermination of when MFFF must contact local and state authorities in addition to SRS responders
 2. MFFF participation in SRS emergency planning, emergency drills, emergency training
 3. MFFF participation in SRS emergency committees
 4. Confirmation that SRS has incorporated planning for MFFF emergencies into the overall SRS emergency plan
2. The existence of public roads through MFFF implies members of the public may be within the controlled area during an emergency. Please address the control of public access during an emergency event using road blocks or other methods. Describe what measures, if any, would be taken to clear these roads during an event. Describe whether SRS or MFFF staff would be responsible for these actions, and indicate if this is addressed in the MOU.
3. Figure 2-2 contains a map of the SRS which is approximately 20 miles in diameter, based on the scale provided. The EE indicates the nearest town is 5.5 miles from the MFFF, and MFFF is located just outside F-Area. Indicate on the map the location of MFFF and F-Area relative to the nearest town. Also Section 2.0 in the fourth paragraph indicates only public road SCR 125 passes within a 5-mile radius of F-Area. The map appears to list multiple other highways including SCR 5, 19, 57, 39 and several unnamed roads. Clarify if these roads are not open for public transportation. In addition, the map appears to indicate that SCR 125 is at least 2-3 miles from the SRS boundary. If MFFF is 5.5 miles from the SRS boundary and 5 miles from SCR 125, the map appears not to be drawn to scale. Please reconcile the apparent difference between the description and map.
4. Table 6-2 contains a list of airborne release fractions and respirable fractions. Please clarify the purpose of this table. Clarify how this table supports the evaluation. Although the table lists some basic forms such as solution, powder, etc. there is no indication of the chemical form or nuclear material involved. A column of the release mechanism is provided, but the location of the event, the type of material, the amount of material, the time frame, etc. are not provided. Also, if the table remains in the application, provide a basis for the ARF and RF values listed in the table for each item? In addition, a number

of the $ARF \times RF$ values appear to be counter intuitive, for example dropping a solution has an $ARF \times RF$ of 2.0×10^{-5} which is lower than a dropped pellet which has an $ARF \times RF$ of 2.0×10^{-4} or explosive detonation of a solution verses a rod which have the same $ARF \times RF$.

5. Table 6-4 contains a number of acronyms which are not defined in the following columns: Event, Unit, Location of Material Within Unit, & 70.22(i)(2) Criteria(v), also table 7.1 under Location. Please provide these definitions within the document so the EE will stand alone. Clarify which of the 70.22(i)(2) Criteria apply to each particular event since some cells are blank, some have words, and some have the word “none,” for example see Load Handling event LH-11. Clarify the meaning of the word “none” as applied to the 70.22(i)(2) Criteria. Note: The layout of Table 7.2 is easy to understand.
6. Consider clarifying the wording of the last sentence on Page 30 section 9.1.

DRAFT