July 28, 2009

MEMORANDUM TO: File

FROM: Kevin M. Ramsey, Project Manager **/RA/**
Fuel Manufacturing Branch
Division of Fuel Cycle Safety
and Safeguards
Office of Nuclear Material Safety
and Safeguards

SUBJECT: CONFIRMATION OF COMMITMENTS IN AMENDMENT 88 TO PERFORM ACTIONS BEFORE STARTING OPERATIONS IN THE NEW CD LINE

On May 11, 2009, Amendment 88 was issued to License no. SNM-124, authorizing the processing of uranium fluoride compounds in the CD Line. This authorization was subject to a condition that required, in part, verifying that Nuclear Fuel Services (NFS) had fulfilled commitments made in its amendment application. This memorandum documents some of the commitments:

1. The applicant committed to conduct an Integrated Safety Analysis (ISA) of appropriate complexity, to maintain the ISA with a suitable configuration management system, to train personnel in the ISA methods, to evaluate facility changes with the ISA methods, to establish and maintain items relied on for safety (IROFS), and to maintain written procedures. **FINDING: Based on the ISA documents reviewed by the U. S. Nuclear Regulatory Commission (NRC) staff and the workers interviewed by NRC staff, we find reasonable assurance that NFS has conducted an ISA of appropriate complexity and has established suitable systems and programs to implement and maintain the ISA.**

2. In response to Request for Additional Information no. 5 (RAI-5), NFS committed to revising IROFS CDS3-16, to state that the control is the integrity of the condenser tubes. **FINDING: The IROFS number was changed to CDS3-11. The description in the ISA Summary refers to the structural integrity of the tubes. Change acceptable.**

Docket No.: 70-143
License No.: SNM-124

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3. In response to RAI-7, NFS committed to revising the initiating event in 5 accident sequences to state that it is an improperly connected system. The sequences are 4.1.6(g), (h), and (j), and 4.1.7(f) and (h). In addition, the description of IROFS CDS1-1 and CDS3-20 shall be revised to state that they are applicable to connections inside the enclosures only. **FINDING: Notwithstanding the commitments in its original response, NFS replaced the 2 IROFS' with a new IROFS CDG-33, which observes for leaks all system connections that have been disconnected, before resuming normal operations. The initiating events for 4 of the 5 sequences were revised to delete the likelihood index from the initiating event column and just refer to the effectiveness of the failed IROFS in the next column (CDG-33). However, NFS failed to revise Sequence 4.1.6(h). NFS stated that this was an oversight and committed to revise the last sequence and submit the change in the next update of the ISA Summary. The revised response to RAI-7 was documented in an e-mail dated July 28, 2009 (ML092090254). The commitment to correct the last sequence will be tracked in the licensee's corrective action program. These changes are acceptable.**

3. In response to RAI-10, NFS committed to revise IROFS CDS3-14 to state that the rinse bottle is 1-liter or less. **FINDING: IROFS CDS3-14 has been renumbered IROFS CDS3-18 and CDS3-19. Both descriptions state that the rinse bottle is 1-liter or less. Change acceptable.**

4. In response to RAI-11, NFS committed to revise Section 3.1.3 to state that a 2-liter bottle is used for clean-up activities. **FINDING: Section 3.1.3, states that a 2-liter bottle may be needed for cleanout operations. Change acceptable.**

5. In response to RAI-12, NFS committed to revise Section 3.1.1 to explain why the Test and Overpack Station has no drains. **FINDINGS: Section 3.1.1, explains why the Test and Overpack Station has no drains. Change acceptable.**

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6. In response to RAI-11, NFS committed to revise Section 3.1.3 to state that a 2-liter bottle is used for clean-up activities. **FINDING: Section 3.1.3, states that a 2-liter bottle may be needed for cleanout operations. Change acceptable.**

7. In response to RAI-12, NFS committed to revise Section 3.1.1 to explain why the Test and Overpack Station has no drains. **FINDINGS: Section 3.1.1, explains why the Test and Overpack Station has no drains. Change acceptable.**

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