



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
SAM NUNN ATLANTA FEDERAL CENTER
61 FORSYTH STREET, SW, SUITE 23T85
ATLANTA, GEORGIA 30303-8931

July 29, 2009

MEMORANDUM TO: Luis A. Reyes, Regional Administrator

THRU: Joseph W. Shea, Director */RA/*
Division of Fuel Facility Inspection (DFFI)

FROM: D. Charles Payne, Chief */RA/*
Fuel Facility Inspection Branch 1
DFFI

SUBJECT: CONFIRMATION OF COMMITMENTS IN AMENDMENT 88 OF
LICENSE SNM-124 TO PERFORM ACTIONS BEFORE
INTRODUCING UF₆ INTO THE COMMERCIAL DEVELOPMENT
(CD) LINE

On May 11, 2009, Amendment 88 to License No. SNM-124 was issued authorizing the processing of uranium fluoride compounds in the CD Line. This authorization was subject to the following condition:

S-54 Introduction of uranium hexafluoride into the CD Line shall not occur until the Commission completes an operational readiness review to verify that (1) commitments in the amendment request have been fulfilled, (2) management measures for items relied on for safety have been implemented, (3) the CD Line has been constructed in accordance with design requirements, and (4) other actions necessary for safe operations are complete.

NRC's verification that Condition (1) has been adequately addressed is captured, in part, by a Memorandum to File from K. Ramsey, NMSS titled "CONFIRMATION OF COMMITMENTS IN AMENDMENT 88 TO PERFORM ACTIONS BEFORE STARTING OPERATIONS IN THE NEW CD LINE," dated July 28, 2009. Verification of completion of the remaining commitments for Condition (1) is captured below:

1. The applicant committed to add an administrative item relied on for safety (IROFS) to control reflection by restricting access to the underside of some enclosures.
CONCLUSION: IROFS CDG-34, "Personnel shall not enter the space beneath enclosures when there is fissile material inside the enclosure unless otherwise approved by Nuclear Criticality Safety. Note, hands and arms are permissible," was added to

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address this commitment. This IROFS was reviewed during the operational readiness review (ORR) inspection as documented in paragraph 2.a(1). The staff concludes this is acceptable to meet the commitment.

2. The applicant committed to remove the second occurrence of IROFS CDG-17 from accident sequences 4.1.1c, 4.1.4b, 4.1.6c, 4.1.6e, 4.1.6i, 4.1.7b, 4.1.7d, and 4.1.7g. **CONCLUSION:** IROFS CDG-17 was successfully removed from the above accident sequences. The staff concludes this is acceptable to meet the commitment.
3. The applicant committed to add additional IROFS to prevent accident sequences from occurring, including a requirement for a second operator to verify that the addition of a container to an enclosure will not exceed the mass limit. **CONCLUSION:** The ORR inspection as documented in paragraph 2.a.(1), reviewed the administrative controls for the enclosures in the CD Line area that required an independently qualified person to verify that limits for the amount of SNM in an enclosure would not be exceeded prior to SNM being introduced into the enclosure. No issues were noted. The staff concludes this is acceptable to meet the commitment.
4. The applicant committed to change the emergency plan to clarify the maximum amount of uranium in a 5A cylinder. **CONCLUSION:** The ORR inspection, documented in paragraph 4.b.(1), verified the maximum amount of uranium in a 5A cylinder was documented in revision 13 of the emergency plan. The staff concludes this is acceptable to meet the commitment.

NRC's ORR inspection, conducted during June 1 through July 8, 2009, verified that the licensee adequately addressed conditions (2), (3), and (4). Condition (2) was verified through a review of management measures of IROFS for the CD Line. Condition (3) was verified through a review of the operational safety portion of the inspection. Condition (4) was verified through a review of the remaining safety function programs under Radiological Controls and Facility Support. Details regarding the findings from NRC's ORR review are found in NRC Inspection Report 70-143/2009-009 (ADAMS Accession Number: ML092050562).

On the basis of the above verification that the elements of License Condition S-54 have been satisfied, DFFI recommends that you authorize introduction of UF₆ into the CD Line.

Distribution: (See page 3)

L. Reyes

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