

November 24, 2009 AET 09-0087

ATTN: Document Control Desk Mr. Michael F. Weber Director, Office of Nuclear Material Safety and Safeguards U.S. Nuclear Regulatory Commission Washington, D.C. 20555-0001

American Centrifuge Lead Cascade Facility
Docket Number 70-7003; License Number SNM-7003
American Centrifuge Plant
Docket Number 70-7004; License Number SNM-2011
Supplemental Brief Summary of Facility Changes for Calendar Year 2007 and 2008

Dear Mr. Weber:

Purpose

The purpose of this letter is to submit to the U.S. Nuclear Regulatory Commission (NRC) supplemental information related to USEC Inc.'s (USEC) brief summary of facility changes for calendar year 2008.

Background

On January 30, 2009, USEC provided a brief summary of the facility changes [made without prior NRC staff approval in accordance with 10 *Code of Federal Regulations* (CFR) 70.72] to the records required by 10 CFR 70.62(a)(2) for calendar year 2008 (Reference 1). On May 21, 2009, the NRC requested additional information on specific changes made during calendar year 2008, in order to verify the requirements of the 10 CFR 70.72 (c) were met (Reference 2). On June 3, 2009, USEC provides the requested information to the NRC (Reference 3). On June 16, 2009, the NRC completed their review and stated all facility changes they reviewed were appropriately made in accordance with the requirements of 10 CFR 70.72, and that prior NRC approval of these changes was not required (Reference 4).

Similarly, on January 30, 2008, USEC provided a brief summary of the facility changes [made without prior NRC staff approval in accordance with 10 CFR 70.72] for calendar year 2007 (References 5 and 6). On April 22, 2008 the NRC requested additional information on specific changes made during calendar year 2007, in order to verify the requirements of the 10 CFR 70.72 (c) were met (Reference 7). On May 6, 2008 USEC provides the requested information to the NRC (Reference 8). On June 25, 2008 the NRC completed their review and stated all Facility Change Evaluations they reviewed were appropriately made in accordance with the requirements of 10 CFR 70.72, and that prior NRC approval of these changes was not required (Reference 9).

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Discussion

Subsequent to Reference 1 through 9, USEC has identified changes that were inadvertently omitted from Reference 1. It should be noted that one of the changes (see Enclosure 1) was also inadvertently omitted from Reference 5. Enclosure 1 provides the brief summary of these facility changes for the American Centrifuge Lead Cascade Facility. Enclosure 2 provides the brief summary of these facility changes for the American Centrifuge Plant.

Action

This is for information purposes only. No specific action is requested concerning this submittal.

Contact

If you have any questions regarding this matter, please contact me at (301) 564-3470 or Terry Sensue at (740) 897-2412.

Sincerely.

Peter J. Miner

Director, Regulatory and Quality Assurance

Enclosures: As Stated

cc: J. Downs – NRC HQ

J. Henson – NRC RII

O. Siurano – NRC HQ

B. Smith – NRC HQ

Reference:

- 1. USEC letter AET 09-0010 from P.J. Miner to M. F. Weber (NRC) regarding Brief Summary of Facility Changes for the American Centrifuge Lead Cascade Facility and American Centrifuge Plant Calendar Year 2008, dated January 30, 2009
- 2. NRC letter from J.R. Downs to P.J Miner regarding Review of Summary of Changes for Calendar Year 2008 American Centrifuge Plant and Lead Cascade Facility (TAC Numbers L32495 & L32496), dated May 21, 2009
- 3. USEC letter AET 09-0046 from P.J. Miner to M. F. Weber (NRC) regarding Additional Information for Facility Changes for Calendar Year 2008 (TAC L32495 & L32496) for the American Centrifuge Lead Cascade Facility and American Centrifuge Plant Calendar Year 2008, dated June 3, 2009
- 4. NRC letter from J.R. Downs to P.J. Miner regarding USEC Inc. Review of Calendar Year 2008 Internally Authorized Facility Changes for the American Centrifuge Plant and Lead Cascade Facility (TAC Numbers L32495 & L32496), dated June 16, 2009

- 5. USEC letter AET 08-0013 from P.J. Miner to M. F. Weber (NRC) regarding Annual Summary of Facility Changes for the American Centrifuge Lead Cascade Facility and American Centrifuge Plant Calendar Year 2007, dated January 30, 2008
- 6. USEC letter AET 08-0014 from P.J. Miner to M. F. Weber (NRC) regarding Annual Summary of Facility Changes for the American Centrifuge Lead Cascade Facility and American Centrifuge Plant Calendar Year 2007, dated January 30, 2008
- 7. NRC letter from J.R. Downs to P.J. Miner regarding American Centrifuge Lead Cascade Facility, Review of Summary of Changes for Calendar Year 2007, (TAC Number L32413) dated April 22, 2008
- 8. USEC letter AET 08-0035 from P.J. Miner to M. F. Weber (NRC) regarding Annual Summary of Facility Changes for the American Centrifuge Lead Cascade Facility—Calendar Year 2007 TAC Number L32413), dated May 6, 2008
- 9. NRC letter from J.R. Downs to P.J. Miner regarding USEC Inc. Review of Calendar Year 2007 Internally Authorized Facility Changes for the American Centrifuge Lead Cascade Facility (TAC Numbers L32413), dated June 25, 2008

Enclosure 1 to AET 09-0087

Brief Summary of Facility Changes for the American Centrifuge Lead Cascade Facility

Calendar Year 2008

2008 Brief Summary of Changes for the American Centrifuge Lead Cascade Facility

FCE Number	Rev.		Approval Date	Change to SSC?	Documents Modified Due to Change	ISA Summary Update Required?	Reason NRC Preapproval Not Required/Comments
FCE 07-0297	1	Title: X-3001 Mass Spectrometer Fault Monitoring Description of Change: Test plan to validate a feedback loop from X-3001 mass spectrometers, through the Distributive Control System, to the Control Room. Reason for the Change: Feedback loop will allow operators to quickly recognize and resolve problems.	10/9/2007	No	ESO-2101-0033 TP-2101-0022 Rev 0	No .	None of the criteria listed in 10CFR70.72(c) are met.
		NOTE: This change was inadvertently omitted from both the 2007 and 2008 annual summary of changes.					
FCE 07-0312	1	Title: Replacement Transformer for X-6000 Description of Change: Work activities associated with purchasing and installing a direct replacement transformer for X-6000. Additional changes required to support the transformer replacement include running new power circuits to fans and heaters, installing new gaskets, repairing cabinet heaters, clean, prepare and coat compartments. Reason for the Change: To ensure the replacement transformer and refurbished circuit breaker	4/25/2008	Yes	ECR-2409-0002	No	None of the criteria listed in 10CFR70.72(c) are met.
		being installed is reliable after old transformer compartments were found to be in poor condition due to lack of maintenance and up-keep. Separation of heater circuits will allow operations and maintenance greater flexibility to remove circuits without de-energizing other compartments.					
FCE 07-0317	1	Title: American Centrifuge Plant Material Disposition Description of Change: Revision 1 removes equipment salvaged from the Gas Centrifuge Project and stored in X-3001, Train 6 Area, for disposal. Reason for the Change: It was decided that the equipment stored in X-3001, Train 6 Area was not suitable for reuse in the American Centrifuge Plant or Lead Cascade. This equipment needs to be removed from the area to allow American Centrifuge Plant refurbishment activities to continue.	8/25/2008	No	ESO-3604-0002, Rev 0 SOW-310101-0001, Rev 2	. No	None of the criteria listed in 10CFR70.72(c) are met.

FCE Number	Rev.		Approval Date	Change to SSC?	Documents Modified Due to Change	ISA Summary Update Required?	Reason NRC Preapproval Not Required/Comments
FCE 08-0002	0	Title: Installation of Maintenance Area Water Distiller Unit in X-3012 Building Description of Change: Added a distillation unit to make pure water for portable equipment battery make-up. Reason for the Change: Economic benefit to produce distilled water instead of purchasing already-distilled water.	1/4/2008	Yes	ESO-2415-0016 JFI-2400-0002, Rev. 0	No	None of the criteria listed in 10CFR70.72(c) are met.
FCE 08-0056	1	Title: Replacement of Evacuation Vacuum Pumps Description of Change: Replace existing Evacuation Vacuum Pumps with dry type vacuum pumps like those used in the Purge Vacuum system, and operate and test them. Revision 1 of this change evaluation was to correct an inaccurate statement that the Integrated Safety Analysis Summary needed changed when it should have stated the change was made in another change evaluation. Reason for the Change:	9/4/2008	Yes	ESO-2101-0028	No	None of the criteria listed in 10CFR70.72(c) are met.
·		The pump model used in the Purge Vacuum system is more reliable than the Evacuation Vacuum system pump model. Revision 1 was to correct the change evaluation.					

Enclosure 2 to AET 09-0087

Brief Summary of Facility Changes for the American Centrifuge Plant Calendar Year 2008

2008 Brief Summary of Changes for the American Centrifuge Plant

PCE Number	Rev.		Approval Date	Change to SSC?	Documents Modified Due to Change	ISA Summary Update Required?	Reason NRC Preapproval Not Required/Comments
PCE 07-0255	1	Title: American Centrifuge Plant Material Disposition Description of Change: Revision 1 removes equipment salvaged from the Gas Centrifuge Project and stored in X-3001, Train 6 Area, for disposal. Reason for the Change: It was decided that the equipment stored in X-3001, Train 6 Area was not suitable for reuse in the American Centrifuge Plant or Lead Cascade. This equipment needs to be removed from the area to allow American Centrifuge Plant refurbishment activities to continue.	8/25/2008	No	ESO-3604-0002, Rev 0 SOW-310101-0001, Rev 2	No	None of the criteria listed in 10CFR70.72(c) are met.
PCE 08-0005	0	Title: Revision to Procedures ACD2-QM-001, Assessment Program and ACD3-QM-001, Quality Assurance Internal Oversight Program Description of Change: ACD2-QM-001, added Director, Engineering, Procurement and Construction to persons who approve the coordinated assessment schedule. ACD3-QM-001, added Director, Engineering, Procurement and	1/15/2008	No .	ACD2-QM-001, Ch. 6 ACD3-QM-001, Ch. 4	No	None of the criteria listed in 10CFR70.72(c) are met.
		Construction to persons who are issued copies of the annual assessment schedule and copies of audit reports. Reason for the Change: USEC Inc. management determined to integrate the Lead Cascade and American Centrifuge Plant organizational structure to be able to better manage all activities. The two procedures are being revised to reflect these organizational changes.					
		NOTE: The Lead Cascade Facility and the American Centrifuge Plant were both evaluated by the same change evaluation. The corresponding number for the Lead Cascade Facility is FCE 08-0010 Rev. 0 which was reported in Reference 1.					

PCE Number	Rev.		Approval Date	Change to SSC?	Documents Modified Due to Change	ISA Summary Update Required?	Reason NRC Preapproval Not Required/Comments
PCE 08-0071 1	1	Title: New Security Program, Classified Distributed Information Network, and Information System Security Plans for ATK/ABL's Facility in Rocket Center, West Virginia	10/29/2008	No	(<i>Updated</i>) ACP-011 Rev 0 ACP-033 Rev 0 ACP-034 Rev 0 ACP-035 Rev 0	No	None of the criteria listed in 10CFR70.72(c) are met.
		Description of Change: Evaluate impact of ATK/ABL security program document updates that were identified during internal readiness review and NRC and DOE regulatory reviews.					
		Reason for the Change: Prepare for implementation of offsite vendor's security program, after it has been approved by the cognizant security agency.					
		NOTE: The Lead Cascade Facility and the American Centrifuge Plant were both evaluated by the same change evaluation. The corresponding number for the Lead Cascade Facility is FCE 08-0101 Rev. 1 which was reported in Reference 1.					
PCE 08-0139	1	Title: Designation of a Temporary Staging Area East of the Static Assembly Stands	10/1/2008	No	None	No	None of the criteria listed in 10CFR70.72(c) are met.
		Description of Change: Establish a temporary storage area for legacy material that Honeywell will remove from the Static Assembly Stands.					
		Reason for the Change: Extend the date for temporary storage until November 20, 2008 as the staging activity is still in progress.					
PCE 08-0149	0	Title: Revision to Procedure ACD4-SH-003, Use of Genrad 1565-B Sound Level Meter	9/23/2008	No	ACD4-SH-003 Ch 2	No	None of the criteria listed in 10CFR70.72(c) are met.
		Description of Change: Incorporate newer model sound level meters which were purchased to replace older, previously referenced models, and adds training module for the associated instruments to the prerequisites.					
		Reason for the Change: Clarify procedure requirements.					
		NOTE: The Lead Cascade Facility and the American Centrifuge Plant were both evaluated by the same change evaluation. The corresponding number for the Lead Cascade Facility is FCE 08-0210 Rev. 0 which was reported in Reference 1.					