



March 23, 2010
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USNRC - Document Control Desk
11555 Rockville Pike
One White Flint North
Rockville, MD 20852

Subject: Clarification and Correction of Information Previously Submitted to the NRC in a License Amendment Application for License SNM-1227 (NRC Docket No. ~~10-2257~~), TAC L32689. 70-1257

This letter is provided to clarify and correct information previously submitted to the NRC by AREVA. AREVA recently discovered an error in the ISA Summary for the Supercritical CO₂(SCCO₂) process, Accident Sequence 186-94, that AREVA provided to the NRC on June 12, 2008 as part of a License Amendment application (TAC L32689), and a concomitant error that AREVA made in its December 1, 2009 response to NRC's Chemical Safety Question 5 which also pertains to accident sequence 186-94.

Accident sequence 186-94 in the submittal addresses failure of the tributyl phosphate (TBP) holding tank (Tank V-72). The ISA Summary erroneously refers to this tank as the TBP/CO₂ Holding Tank. The correct name for this tank is the TBP holding tank, designated as V-72. The ISA Summary also incorrectly indicated that catastrophic failure of this tank would result in high consequences as defined by 10CFR 70 and that this tank was constructed in accordance with ASME Code Section VIII, Division 1.

This tank, the TBP holding tank (V-72), is a 4-inch diameter by 27-inch long tank that is constructed to the requirements of DOT-3A 1800/TC-3ASM 124. Catastrophic failure of this tank does not result in high or intermediate consequences as defined by 10CFR 70; therefore Accident Sequence 186-94 should not have been included in the ISA Summary.

When responding to RAI Chemical Safety Question 5, AREVA indicated that the "TBP/CO₂ holding tank" would be designated as an IROFS along with the associated state inspections. This is also in error. The author of the response had in mind the TBP/CO₂ separator tank (V-71) rather than the TBP Holding Tank (V-72) (referred to as the TBP/CO₂ Holding Tank in the ISA Summary and the response to Chemical Safety RAI 5). AREVA's response should have stated that the TBP Holding Tank (V-72) is normally open to the atmosphere, has a nominal OD less than six inches, and that catastrophic failure of this tank will not result in high or intermediate consequences as defined by 10CFR 70.

Because no accident sequences associated with this tank result in high or intermediate consequences as defined by 10CFR 70, the ISA summary will be updated and no accident sequences associated with the TBP holding tank, V-72, will be included.

AREVA NP INC.
An AREVA and Siemens company

2101 Horn Rapids Road, Richland, WA 99354
Tel.: 509 375 8100 - www.aveva.com

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AREVA regrets any confusion that these errors may have caused the NRC reviewers. If you have any questions please contact Calvin Manning of my staff via telephone at (509) 375-8237.

Very truly yours,

A handwritten signature in black ink, appearing to read "Robert E. Link". The signature is fluid and cursive, with a large initial "R" and "L".

R. E. Link, Manager
Environmental, Health, Safety, & Licensing

cc: U.S. Nuclear Regulatory Commission, Region II
Attn: Mary Thomas, Sr. Inspector
Sam Nunn Atlanta Federal Center, 23 T85
61 Forsyth Street, SW
Atlanta, GA 30303-8931

U.S. Nuclear Regulatory Commission
Attn: RL Rodriguez, NMSS/FCSS
Executive Blvd. Bldg.
6003 Executive Boulevard
Rockville, MD 20852