



**Admin Controls
and LAR-10-04**

**May 4, 2010
Rockville, MD**



Opening Remarks

Gregory Smith

President and Chief Executive Officer

Purpose



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- Present License Amendment Request LAR-10-04 provided to the NRC on May 3, 2010
 - Request urgent attention by the NRC under the assumption it is a considered a startup restraint
 - Provide details and response to any questions regarding the LAR to expedite its review
 - Address Support Equipment for Administrative Control IROFS required for First Cascade On Line only (others will be address as part of the readiness review process for later operational phases).

LAR-10-04



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- LAR-10-04 enhances the monitoring and worker response associated with Administrative Control IROFS
 - Achieved by adding Support Equipment into the Administrative Control IROFS boundary for the purpose of applying applicable Management Measures to attributes only, additional reporting and controls similar to those applied to IROFS also apply
 - Support Equipment Definition: Support Equipment have *attributes* relied upon by the worker to perform the human actions that meet the safety performance requirements of the administrative control.

Summary of Proposed Changes



SAR

- A new Compliance Item Commitment is made for Support Equipment and attributes relied upon for worker actions.
- A new Table is added that identifies Administrative Control IROFS, monitoring support equipment, operated support equipment, and corresponding attributes. Only equipment that meets the definition of Support Equipment is included in the table. IROFS and components with safe-by-design attributes which may be within the administrative IROFS boundary are not included in this table (such items are address separately).
- A paragraph is added to delineate that management measures are also applied to Support Equipment attributes.

Summary of Proposed Changes



QAPD

- A new sub-section was added that defines that Verification of the *attributes* are controlled by the applicable management measures.
- In addition, specifies that Support Equipment within the Administrative Control IROFS boundary is QL-3.
- Requires that the *attributes* are defined in the Administrative Control IROFS Boundary Definition Documents.
- Denotes that changes to the application of Management Measures to confirm attributes of Support Equipment used for Administrative Control IROFS work actions require prior NRC approval if a reduction in commitment

Additional Changes



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- URENCO USA is preparing a configuration change request to add a new additional IROFS (IROFS C22, mass balance) to accident sequence EC3-1 to supplement IROFS C6. This configuration change has preliminarily been determined within LES approval authority and will be completed prior to First Cascade On Line.
 - URENCO USA will, subsequent to this change, be able to remove IROFS C6 as IROFS C22 will provide adequate prevention under 10 CFR 70.61.

Summary



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- As noted in LAR-10-04:
 - Administrative Control IROFS Support Equipment are not IROFS
 - Such equipment is not required for any automatic function but serves as one means to support worker action by providing indication or support for action implementation
 - As a safety enhancement to the ISA, LES has proposed to add this equipment to the boundary for the committed application of Management Measures to attributes used to support work actions (e.g., accurate and reliable indication)
 - Worker actions are preventive in nature. Failure of monitoring equipment, by procedure, requires operator implementation of the preventive action
 - Assurance of these attributes is maintained by verifying the attributes utilizing appropriate management measures
 - Reporting of certain losses or degradations would also be accomplished



Closing Remarks

Gregory Smith

President and Chief Executive Officer

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Questions?