

From: Shackelford, W. Randy [WRShackelford@nuclearfuelservices.com] on behalf of Ramsey, Kevin
Sent: Tuesday, June 01, 2010 4:22 PM
To: Shackelford, W. Randy; Hrabal, Craig; Wheeler, Jennifer K.
Subject: Final summary of meeting on 5/28/10

On May 28, 2010, a meeting was conducted with Nuclear Fuel Services (NFS) to discuss additional information needed by NRC staff to process licensing actions involving criticality safety issues. The following individuals participated:

Kevin Ramsey, NRC
Craig Hrabal, NRC
Randy Shackelford, NFS

In many cases, NFS simply wanted to confirm that it understood what information NRC needed. However, NRC agreed to revisit several items before it issues the letter requesting additional information. The following items were discussed:

Item 1: Need for criticality alarm. NRC does not endorse the part of the ANSI standard that allows no alarm if a criticality is not credible. If NFS requests an exemption, NRC will consider it. It was noted that special authorizations are addressed in Chapter 1 of the renewal application.

Item 2: Commitment for audible alarm. It was agreed that an audible alarm is required by regulation. This item will be deleted.

Item 3: Nuclear Criticality Safety (NCS) Policy. It was agreed that NFS will describe the major topics of its NCS Policy in the response to the RAI and that these topics do not need to be placed in the License Application (LA).

Items 4 and 11: Demonstrate that reflection less than reflection from a one-inch, close-fitting reflector (partial reflection) can be used to conservatively represent reflection. NRC will clarify that it prefers compliance to be demonstrated with a one-inch, close-fitting reflector for normal conditions and full reflection for accident conditions. Reflection less than that from a one-inch, close-fitting reflector (partial reflection) should be used only when compliance cannot be demonstrated with these methods. However, NFS needs to define the limits that will be placed on the use of partial reflectors and provide a basis for finding that reflection within those limits is conservative.

Item 5: Define "practicable" and provide explicit criteria. It was agreed that NRC regulations and guidance fail to define this term even though it appears in NRC regulations and guidance. NRC will consider revising the item to request a description of how NFS determines when a control is practicable. It was agreed that NFS would include this description in the response to the RAI and not in the LA.

Item 6: Commit to consider the most reactive combinations of tolerances on controlled parameters. NFS noted language already in its application. NRC will consider deleting this item.

Item 7: Moderation control. NFS will explain that it doesn't use moderation control that requires sampling.

Item 8: "Unlikely". NFS agreed to indicate that the justification (for unlikely) is included in the Nuclear Criticality Safety Evaluation (NCSE).

Item 9. Preference for two parameter control. NFS disagrees that controlling two different parameters is preferable. It believes that two independent controls on the same parameter is just as good.

Item 10: Describe program used to report and correct deficiencies. NFS noted language already in its application. NRC will consider deleting this item.

Item 11: See Item 4 above.

Item 12: Documenting the basis for selecting a less-preferred control over a more-preferred control. This is similar to Item 5 above. NRC will consider revising or deleting.

Item 13: Interstitial moderation. NFS will address not using full reflection when it isn't conservative.

Item 14: Margin and validation when handbooks are used. NFS noted language already in its application. NRC will consider deleting this item.

Item 15: Adequate margin of subcriticality. NFS will state that it does sensitivity studies.

Item 16: How margin is determined: NFS will state that it uses the same margin specified in the handbook.

Item 17: Commit to specified ANSI standards. NFS noted that one standard isn't applicable and another standard isn't used currently (but may be used in the future). NRC will consider revising or deleting the item.

Item 18: Maintain documentation of criticality alarm. NFS will commit to maintain documentation.

Item 19. Commitments for NCSE's. NFS agreed to make the commitments.

Item 20: Most recent validation report. NFS agreed to provide the validation report for review only (not to be docketed).

Item 21: Justify use of 0.015 margin of subcriticality. NFS noted that the same margin is specified in the existing License Condition S-10. NFS will provide background information in its response.

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E-mail Properties

Mail Envelope Properties (0B124DB17F52544E9F69477FB58744568ABE372DC9)

Subject: Final summary of meeting on 5/28/10
Sent Date: 6/1/2010 4:17:59 PM
Received Date: 6/1/2010 4:21:00 PM
From: Shackelford, W. Randy

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Files	Size	Date & Time
MESSAGE	17078	6/1/2010

Options

Expiration Date:
Priority: olImportanceNormal
ReplyRequested: False
Return Notification: False

Sensitivity: olNormal
Recipients received: ZZZ