

September 16, 2010

MEMORANDUM TO: Anthony T. Gody, Director  
Division of Fuel Facility Inspections

FROM: Marissa G. Bailey, Acting Director **/RA/**  
Division of Fuel Cycle Safety  
and Safeguards  
Office of Nuclear Material Safety  
and Safeguards

SUBJECT: CHANGES TO THE MASTER INSPECTION PLAN FOR AREVA  
NP, INC. LYNCHBURG

In your letter dated December 16, 2009 (ML093500438), you described a proposed deviation from the calendar year 2010 and 2011 Master Inspection Plans.

On July 14, 2009, parts of the AREVA NP, INC. Lynchburg, Virginia Site License was transferred to the Commonwealth of Virginia Radioactive Material License 680-515-1. The Division of Fuel Facility Inspection (DFFI) in Region II has proposed reducing the Calendar Year (CY) 2010 and 2011 inspection hour for AREVA-Lynchburg, a Category III Fuel Assembly Facility, and grouping inspection procedures into a health physics suite and an engineering suite. The engineering suite will have the plant operations, fire protection, maintenance, permanent plant modification, management organization and control, and operator training modules. The health physics suite will have the radiation protection, environmental, emergency preparedness, radioactive waste, transportation, and emergency preparedness modules. This grouping will allow one inspector to complete the inspections in one week. Currently these inspections take five separate inspections to complete.

DFFI in Region II has also proposed reducing the inspection hours for AREVA-Lynchburg based on efficiencies gained with the advent of electronic records particularly in the areas of dosimetry, training, and transportation. In addition, based on the change in scope of the U.S. Nuclear Regulatory Commission (NRC) license, the inspections cover four operations (rod loading, bundle assembly, packaging, and transportation) in one building. The hours for the following Inspection Procedures (IP) will be reduced as follows:

CONTACT: Thomas Marenchin, NMSS/FCSS  
(301) 492-3209

<b>Program Area</b>	<b>Inspection Procedure Number</b>	<b>Inspection Manual Chapter(IMC) 2600 Current Estimated Resources per year (hours)</b>	<b>Proposed Estimated Resources per year (hours)</b>
Transportation	86740	16	8
Operator Training	88010	12	6
Maintenance	88025	8	0
Radiation Protection	88030	16	8
Waste Management	88035	12	6
Environmental Protection	88045	12	6
Annual Fire Protection	88054	8	6

The transportation inspection, IP 86740, would be reduced because the plant will no longer transport reactor components under an NRC license.

The operator training inspection, IP 88010, would be reduced because the operators of concern are limited to the Uranium Production Center (UPC).

The maintenance inspection, IP 88025, would be reduced as inspection activities under this IP are already covered under the operational safety inspection, IP 88020, with respect to functional testing.

The radiation protection inspection, IP 88035, would be reduced to dry active waste and scrap pellets from the UPC.

The environmental inspection, IP 88045, would be reduced because the UPC only has one stack such that the detailed analysis under the NRC license would be limited to that one stack. However, the licensee would still be responsible for the total dose from the plant.

The annual fire protection inspection, IP 88054, would be reduced because the area of concern is now limited to the UPC.

Approval from the Director of the Division of Fuel Cycle Safety and Safeguards is required for deviations from IMC 2600, issued January 27, 2010. The point of contact for this approval of changes to the master inspection plan is Thomas Marenchin, at (301) 492-3209.

I approve of the noted changes to the CY 2010 and 2011 Master Inspection Plans.

/RA/

Marissa G. Bailey, Acting Director  
Division of Fuel Cycle Safety  
and Safeguards  
Office of Nuclear Material Safety  
and Safeguards

<b>Program Area</b>	<b>Inspection Procedure Number</b>	<b>Inspection Manual Chapter(IMC) 2600 Current Estimated Resources per year (hours)</b>	<b>Proposed Estimated Resources per year (hours)</b>
Transportation	86740	16	8
Operator Training	88010	12	6
Maintenance	88025	8	0
Radiation Protection	88030	16	8
Waste Management	88035	12	6
Environmental Protection	88045	12	6
Annual Fire Protection	88054	8	6

The transportation inspection, IP 86740, would be reduced because the plant will no longer transport reactor components under an NRC license.

The operator training inspection, IP 88010, would be reduced because the operators of concern are limited to the Uranium Production Center (UPC).

The maintenance inspection, IP 88025, would be reduced as inspection activities under this IP are already covered under the operational safety inspection, IP 88020, with respect to functional testing.

The radiation protection inspection, IP 88035, would be reduced to dry active waste and scrap pellets from the UPC.

The environmental inspection, IP 88045, would be reduced because the UPC only has one stack such that the detailed analysis under the NRC license would be limited to that one stack. However, the licensee would still be responsible for the total dose from the plant.

The annual fire protection inspection, IP 88054, would be reduced because the area of concern is now limited to the UPC.

Approval from the Director of the Division of Fuel Cycle Safety and Safeguards is required for deviations from IMC 2600, issued January 27, 2010. The point of contact for this approval of changes to the master inspection plan is Thomas Marenchin, at (301) 492-3209.

I approve of the noted changes to the CY 2010 and 2011 Master Inspection Plans.

/RA/

Marissa G. Bailey, Acting Director  
 Division of Fuel Cycle Safety  
 and Safeguards  
 Office of Nuclear Material Safety  
 and Safeguards

DISTRIBUTION:

FCSS r/f                      AGody, RII                      MSykes, RII                      MThomas, RII

**ML102590311**

<b>OFFICE</b>	TSB	TSB	TSB	SPTSD
<b>NAME</b>	TMarenchin	PJenifer	PSilva	MBailey
<b>DATE</b>	09/16/10	09/16/10	09/16/10	09/16/10

**OFFICIAL RECORD COPY**