

From: Ramsey, Kevin
Sent: Tuesday, November 23, 2010 10:47 AM
To: Chapman, Gregory; Wheeler, Jennifer K.;
DECoulter@nuclearfuelservices.com; BWLittle@nuclearfuelservices.com;
Barbara A Oneal; LC M
Subject: Final summary of 11/18/10 Call w/NFS re: Chapter 4 of License Renewal
Attachments: L32830 Feedback Form for 2010-11-18 call.pdf

Participants may wish to consider providing feedback using the attached form.

On November 18, 2010, a call was conducted with Nuclear Fuel Services (NFS) regarding open issues associated with Chapter 4 (Radiation Protection) of its license renewal application. The following individuals participated:

Kevin Ramsey, NRC
Greg Chapman, NRC
Jennifer Wheeler, NFS
David Coulter, NFS
Brandon Little, NFS
Barbara O'Neal, Erwin Citizens Awareness Network
Linda Modica, Sierra Club

In August, NFS responded to a request for additional information (RAI). After reviewing the responses concerning Chapter 4, the following RAI questions remain open:

RAI 4.5 – NRC stated that the response appears inadequate as the passage cited utilizes “may” and, as such, the application does not appear to commit to routine reviews/revisions to ensure procedures remain current and relevant. NFS stated that it intended to reword the application as follows:

“If an active operating or general safety procedure has not been revised within a three-year period, the procedure will be reviewed to ensure it remains current and relevant. The chairman of the safety review committee may select individual members to perform the review, rather than the entire committee.”

NRC stated that the revised wording would close the issue.

RAI 4.6 – NRC stated that this issue is open because the wording in the existing license is being revised and the license renewal application needs to be consistent with any changes. NRC noted that it received additional information concerning the proposed changes in a letter dated October 28, 2010 (see ML103081067). Based on its review, NRC believes the proposed changes are acceptable as supplemented by the October 28 letter. The license renewal application should be revised to match. NFS stated that it intended to revise the license renewal application to match.

RAI 4.14 – NRC stated that the response did not address what guidance is followed when performing particle size determination. NFS stated that it intends to delete the reference to performing particle size determination and just use the guidance in ICRP-68. NRC stated that the change would close the issue.

RAI 4.15 – NRC stated that the response is confusing because the licensee utilizes ICRP 68 DACs/ALIs. NFS needs to clarify what this passage is attempting to accomplish with respect to adjusting particle size for the DAC/ALI published in 10 CFR 20 and why this is “independent.” NFS stated that, similar to the previous issue, it intends to delete the reference to performing particle size determination and use of 10 CFR 20 DACs and ALIs and state that it uses the guidance in ICRP-68. NRC stated that the change would close the issue.

RAI 4.17 – NRC stated that it appears from this response that the air sampling program routinely underestimates the exposures to personnel by up to a factor of 2. NRC asked how this is justified or otherwise addressed in evaluating exposures to personnel. NFS stated the passage in question is based on guidance in Regulatory Guide (RG) 8.25 to demonstrate representativeness in the air sampling program. NRC suggested adding a reference to RG 8.25. NFS agreed to make the change.

RAI 4.18 – NRC stated that use of a scrubber/demister where dry material is processed (assumed to mean insoluble material) may create additional concerns due to criticality safety for accumulated insoluble material. NFS needs to clarify this section and explain how it can be operated in a safe manner with regards to criticality safety. NFS stated that it needed to consult with criticality safety staff. NRC suggested that NFS add a commitment to perform a criticality safety review of scrubbers and demisters. After the call, NFS committed to update the text in 4.6.4 as follows to address the NRC question:

4.6.4 Filtration System Specifications

Exhaust systems where dry material is processed with potentially contaminated airborne effluents are either equipped with HEPA filter media (selected to maintain integrity when subjected to chemicals and solvents in the processes) or scrubber/demister. These systems will meet the effluent requirements of SNM-124, Chapter 9, and the nuclear criticality safety requirements of SNM-124, Chapter 5. The HEPA filters are rated at least 99.97% efficient for removal of 0.3 micron particles and have a fire resistant rating of UL 586.

In addition to the RAI questions, NRC noted that NUREG-1520, Section 4.4.4.3, bullet 3 states that the licensee’s application should “specify written, approved RWPs for activities involving licensed material that are not covered by written radiation protection procedures.” While the application does discuss the application of RWP/SWPs in the context of operations with significant hazards, upon additional review the application does not appear to contain adequately similar language in Section 4.4.6. NFS noted that Section 11.4 states that any activity involving the handling of special nuclear material (SNM) and/or items relied on for safety (IROFS) are conducted in accordance with written procedures as defined in Chapter 11. Additionally, the first sentence of Section 4.4.6 states “Routine and repetitive work performed in Restricted Areas is administered by the use of operating procedures, letters of authorization, or special work instructions.” NRC suggested adding a reference to Chapter 4 to clarify where this commitment is located in Chapter 11.

At the end of the meeting, the public participants were asked if they had any questions. Ms. Modica stated that she had some questions about effluent monitoring reports. NRC stated that effluent monitoring is an environmental protection issue and it was unclear whether a meeting on the environmental protection chapter was going to be needed. Feedback from the reviewers of that chapter is still pending. Ms. Modica stated that the questions had been e-mailed to Mr. Ramsey and she would wait for a response to the e-mail.

Ms. O'Neal stated that she had no questions on Chapter 4, but asked if there would be additional meetings. NRC stated that two more meetings are scheduled for December 2, 2010. Additional meetings may be scheduled if needed to resolve open issues.

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E-mail Properties

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Subject: Final summary of 11/18/10 Call w/NFS re: Chapter 4 of License Renewal
Sent Date: 11/23/2010 10:20:02 AM
Received Date: 11/23/2010 10:46:00 AM
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MESSAGE	108608	11/23/2010	
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