



■ 1205 banner hill road ■ erwin, tn 37650 ■ phone 423.743.9141  
■ www.nuclearfuelservices.com

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21G-11-0014  
GOV-01-55-04  
ACF-11-0027

January 24, 2011

Director, Office of Nuclear Material Safety and Safeguards  
U.S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, DC 20555

Reference: Docket No. 70-143; SNM-124

Subject: **Submittal of Internally Authorized Changes (IACs) for Calendar Year 2010**

<b>OFFICIAL USE ONLY</b>
May be exempt from public release under the Freedom of Information Act (5 U.S.C. 552)
Exemption number <u>2</u>
Nuclear Regulatory Commission review required before public release.
<u>B. Shackelford 1/24/11</u> NFS, Inc.
Name and organization of person making determination
Date of Determination _____

In accordance with 10 CFR 70.72(d)(2), Nuclear Fuel Services, Inc. (NFS) hereby submits a summary of the Internally Authorized Changes (IACs) that were implemented at NFS during Calendar Year 2010.

The *Summary of IACs Implemented During Calendar Year 2010* (Attachment 1) includes for each IAC: IAC number, IAC Title and Reason for IAC, and the Date the IAC was Released for Operation. The "Reason for IAC" includes a brief description of why the change was made.

In accordance with License Condition S-25 of SNM-124, each IAC was reviewed by NFS' safety disciplines; and the questions from 10 CFR 70.72(c)(1 - 4) were answered using the documentation shown in Attachment 2. If the answer is "Yes" to any of the questions, then NRC approval is required. Each IAC is also approved by the Safety and Safeguards Review Council (SSRC). All IACs included in Attachment 1 did not require pre-approval under 10 CFR 70.72 because responses to each question from 10 CFR 70.72(c)(1 - 4) were "No."

**Information provided in Attachment 1 includes sensitive information and is marked as "Official Use Only" in accordance with 5 U.S.C. 552, and is not suitable for public release.**

The Integrated Safety Analysis (ISA) Summaries that reflect changes to existing NFS operations and those at the BLEU Complex were revised and are being submitted under separate cover letter in accordance with 10 CFR 70.72(d)(3). To assist in your review of the revised ISA Summaries, Attachment 1 groups the IACs by the ISA Summary that relates to each process change.

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If you or your staff have any questions, require additional information, or wish to discuss this further, please contact me, or Ms. Jennifer Wheeler, Licensing and ISA Manager, at (423) 735-5429. Please reference our unique document identification number (21G-11-0014) in any correspondence concerning this letter.

Sincerely,

**NUCLEAR FUEL SERVICES, INC.**



Mark P. Elliott, Director  
Quality, Safety, and Safeguards

JKW/pdj  
Attachments

Copy:

Regional Administrator  
U.S. Nuclear Regulatory Commission  
Region II  
245 Peachtree Center Avenue NE, Suite 1200  
Atlanta, GA 30303-1257

Mr. John Pelchat  
Project Inspector  
U.S. Nuclear Regulatory Commission  
Region II  
245 Peachtree Center Avenue NE, Suite 1200  
Atlanta, GA 30303-1257

Mr. Kevin Ramsey  
Project Manager  
Fuel Manufacturing Branch  
Fuel Facility Licensing Directorate  
Division of Fuel Cycle Safety and Safeguards  
Office of Nuclear Material Safety and Safeguards  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Mr. Galen Smith  
Senior Resident Inspector  
U.S. Nuclear Regulatory Commission

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**ATTACHMENT 2**

License Amendment Evaluation from NFS-GH-44

1 page to follow

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NFS-GH-44, Revision 10  
 April 29, 2009  
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**License Amendment Evaluation**

<b>IAC #:</b>	<b>IAC/Change Title:</b>
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**ISA Evaluated For:**  
 Radiological  Chemical  Fire  Environmental Rad  Criticality  Environmental Chem

QUESTION/EVALUATION	ANSWER
1. Does this change require a modification to the license conditions or Part I of SNM-124? _____ _____	Yes <input type="checkbox"/> No <input type="checkbox"/>
2. Does this change create new types of accident sequences that, unless mitigated or prevented, would result in high or intermediate consequences (exceed the performance requirements of 10 CFR 70.61) and have not previously been described in the ISA Summary? _____ _____	Yes <input type="checkbox"/> No <input type="checkbox"/>
3. Does this change result in the use of new processes, technologies, or controls for which NFS has no prior experience? _____ _____	Yes <input type="checkbox"/> No <input type="checkbox"/>
4. Does this change result in the removal, without at least an equivalent replacement of the safety function, of an item relied on for safety that is listed in the ISA Summary and is necessary for compliance with the performance requirements of 10 CFR 70.61? _____ _____	Yes <input type="checkbox"/> No <input type="checkbox"/>
5. Does this change result in the alteration of any item relied on for safety, listed in the ISA Summary, that is the sole item preventing or mitigating an accident sequence that exceeds the performance requirements in 10 CFR 70.61? _____ _____	Yes <input type="checkbox"/> No <input type="checkbox"/>
6. Does this change require an NRC-approved Decommissioning Plan? (See Attachment I) _____ _____ _____	Yes <input type="checkbox"/> No <input type="checkbox"/>
7. Does this change require NRC approval prior to installation or implementation of the IAC? (If any question above is answered yes, NRC approval is required.) _____ _____	Yes <input type="checkbox"/> No <input type="checkbox"/>

Reviewer: _____	Date: _____
Print / Signature	
Safety Function Manager: _____	Date: _____
Print / Signature	

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