February 14, 2011
REL:11:008

U.S. Nuclear Regulatory Commission
Director, Office of Nuclear Material Safety
and Safeguards
Attn: Document Control Desk
11555 Rockville Pike
One White Flint North
Rockville, MD 20852

Subject: Application for Amendment to License No. SNM-1227; Changes to Chapter 2.0, Organization and Administration; AREVA NP Richland Facility (Docket No. 70-1257)

The purpose of this amendment request is to authorize changes to the Richland site management organization as currently described in Section 2.1, Site Organization, and 2.2, Organizational Responsibilities and Authority, of License No. SNM-1227 for AREVA's Richland fuel fabrication facility. The reason underlying the request is AREVA NP's plans to eliminate the position referred to in Section 2.1 as the Fuel America (FA) Vice President, Manufacturing.

AREVA NP is pursuing this course of action to streamline its management organization in light of its ongoing initiative to consolidate its current Richland and Lynchburg fuel fabrication activities to a single location at Richland. From a practical standpoint, this change will have no adverse impact on the safe utilization of special nuclear material (SNM) on the Richland site. As is currently the case, the Richland Site Manager will maintain the designated role as the onsite AREVA NP management representative with responsibility for assuring that the site's SNM activities "are conducted in a manner that is protective of workers, the public, and the environment".

Attached is a copy of a revised Chapter 2.0, Organization and Administration, of License No. SNM-1227. Changes are confined to Sections 2.1 and 2.2, in each case eliminating reference to the position of Vice President, Manufacturing. Depiction of the site management organization on a functional basis continues to be provided via Figure 2.1; no changes to this figure are needed.

We appreciate the NRC's assistance in facilitating this organizational change. If you have questions, please feel free to contact me at 509-375-8409.

Very truly yours,

R. E. Link, Manager
Environmental, Health, Safety, & Licensing

MMS501

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EHS&L Document

SNM-1227 - Chapter 2
Organization and Administration

Nature of Changes

Item	Paragraph	Description	Justification
1.	2.1, First Sentence	Replaced reference to Fuel America Vice President, Manufacturing with Richland Site Manager.	Eliminating position of VP, Manufacturing.
2.	2.2.1, Last Sentence	Eliminated "or a combination of education and experience judged appropriate by the Vice President, Manufacturing." Added provision for alternative combinations of education and experience based on ANSI standard guidance.	Eliminating position of VP, Manufacturing.
3.			
4.			
5.			
6.			
7.			
List Below any Documents, including Forms & Operator Aids which must be issued concurrently with this document revision:			
Do Not make document effective until Loren Maas releases after NRC approval.			

This Document contains a total of 9 pages excluding the signature page generated by Documentum, the document control application software.

DOCUMENT REVIEW/APPROVAL/DELETION CHECKLIST

All new and/or revised procedures shall be approved by the change author, cognizant manager(s) of areas affected by the changes, and by applicable manager(s) of any function that approved the previous revision of the document unless responsibility for such approval has been transferred to another organization. Also, the procedure shall be approved by manager(s) of functional organizations that provide technical reviews with the exception of the Training Department. Finally, Document Control shall verify that the required approvals have been properly obtained and that any documents that must be issued concurrently are ready to be issued.

Minor Changes: If the changes are limited to editorial and/or administrative, check the box at the right. Only Change Author review is required. All applicable approvals must still be obtained. ☐

Document Reviews			Document Approvals	
Purpose/Function of Review	Specify Reviewer(s) (Optional except for change author)	(Check all that apply)	Title of Approver	(Check all that Apply)
Document Control (Automatic)		☒	Document Control (Automatic)	☒
Change Author	LJ Maas	☒	Author	☒
Independent Technical Review	RE Link	☒		
Operability Review(s)			Mgr, Richland Operations[1]	☐
Conversion		☐	Mgr, Uranium Conversion & Recovery Operations[1]	☐
Recovery		☐		
Ceramics		☐	Mgr, Ceramic Operations[1]	☐
Rods		☐	Mgr, Rods & Bundles[1]	☐
Bundles		☐		
Transportation		☐		
Components		☐	Mgr, Component Fabrication[1]	☐
Maintenance Review		☐	Mgr, Maintenance[1]	☐
Lab Review		☐	Mgr, Analytical Services[1]	☐
EHS&L Review(s)			Mgr, EHS&L[2]	☒
Criticality		☐	Mgr, Criticality Safety[2]	☐
Radiation Protection		☐	Mgr, Safety, Security & Emergency Preparedness[2]	☐
Safety/Security		☐		
Emergency Preparedness		☐		
MC&A	LJ Maas	☒	Mgr, Licensing & Compliance[2]	☐
Transportation		☐		
Environmental		☐		
Mechanics Richland Review		☐	Mgr, Mechanics Richland	☐
Mechanics Lynchburg Review		☐		
Thermal-Hydraulics, Richland Review		☐	Mgr, Thermal-Hydraulics, Richland	☐
Project Engineering Review		☐	Mgr, Project Engineering	☐
Quality Review		☐	Mgr, Richland Site Quality	☐
Project & Plant Eng. Review		☐	Mgr., Project & Plant Eng.	☐
Purchasing Review		☐	Mgr, Purchasing	☐
Others:		☐	Mgr, Richland Site/Other	☐
Document Control		☐	Richland Records Management	☐
Training & Employee Dev.:[3]		☐	Training & Employee Dev.	☐

[1]Note: If approvals include 2 or more product center managers, the Operations manager can be substituted for the applicable product center managers.

[2]Note: If approvals include 2 or more EHS&L functional managers, the EHS&L manager can be substituted for the applicable EHS&L functional managers.

[3]Note: Training department review is required for all procedures that require or affect a Learning Plan and if additional training materials or curriculum must be revised before issuing procedure.

EHS&L Change Impact Evaluation Form			
The scope / content of this document have been determined by EHS&L to not directly impact the safe handling of licensed materials (enriched uranium). Future revisions to this document do not require the 10CFR 70.72 change evaluation unless the scope of the document changes such that it directly impacts the handling of licensed materials.			☐
Document Version:	EHS&L Review:	Date:	

Document / ECN No*:	E10-08-002	Change Evaluator:	LJ Maas
Does the change potentially impact Criticality Alarm System (CAS) coverage?		☐ Yes ☒ No	If yes, explain:
NRC Pre-Approval Evaluation:			
Is NRC Pre-approval (License Amendment) Needed? (Based on "Yes" answer to any of five questions below). (Based on "No" answer to all five questions below).		☒ Yes ☐ No	Organizational change affecting Chapter 2.0 of SNM-1227.
1. Does the change create new types of accident sequences that, unless mitigated or prevented, would exceed the performance requirements of 10 CFR 70.61 (create high or intermediate consequence events) and that have not previously been described in AREVA NP's ISA Summary?		☐ Yes ☒ No	If yes, explain:
2. Does the change use new processes, technologies, or control systems for which AREVA NP has no prior experience?		☐ Yes ☒ No	If yes, explain:
3. Does the change remove, without at least an equivalent replacement of the safety function, an item relied on for safety that is listed in the ISA Summary?		☐ Yes ☒ No	If yes, explain:
4. Does the change alter any item relied on for safety, listed in the ISA Summary, that is the sole item preventing or mitigating an accident sequence of high or intermediate consequences?		☐ Yes ☒ No	If yes, explain:
5. Does the change qualify as a change specifically prohibited by NRC regulation, order or license condition?		☐ Yes ☒ No	If yes, explain:
Actions Required Prior to or Concurrent with Change Implementation Evaluation:			
Action			**Explanation**
6. Modification / Addition to CAS system or system coverage documentation		☐ Yes ☒ No	If yes, explain:
7. Acquire NRC pre-approval (license amendment)		☒ Yes ☐ No	If yes, explain: Organizational change.
8. Conduct/modify ISA		☐ Yes ☒ No	If yes, explain:
9. ISA Database Modification		☐ Yes ☒ No	If yes, explain:
10. Modification of other safety program information / underlying analyses (PHA, RHA, FHA, NCSA, etc.)		☐ Yes ☒ No	If yes, explain:
Actions required subsequent to Change Implementation Evaluation:			
11. Update safety program information (PHA,RHA,FHA,NCSA, P&ID)		☐ Yes ☒ No	If yes, explain:

* If this form exists as a part of a document, the document number is not required.

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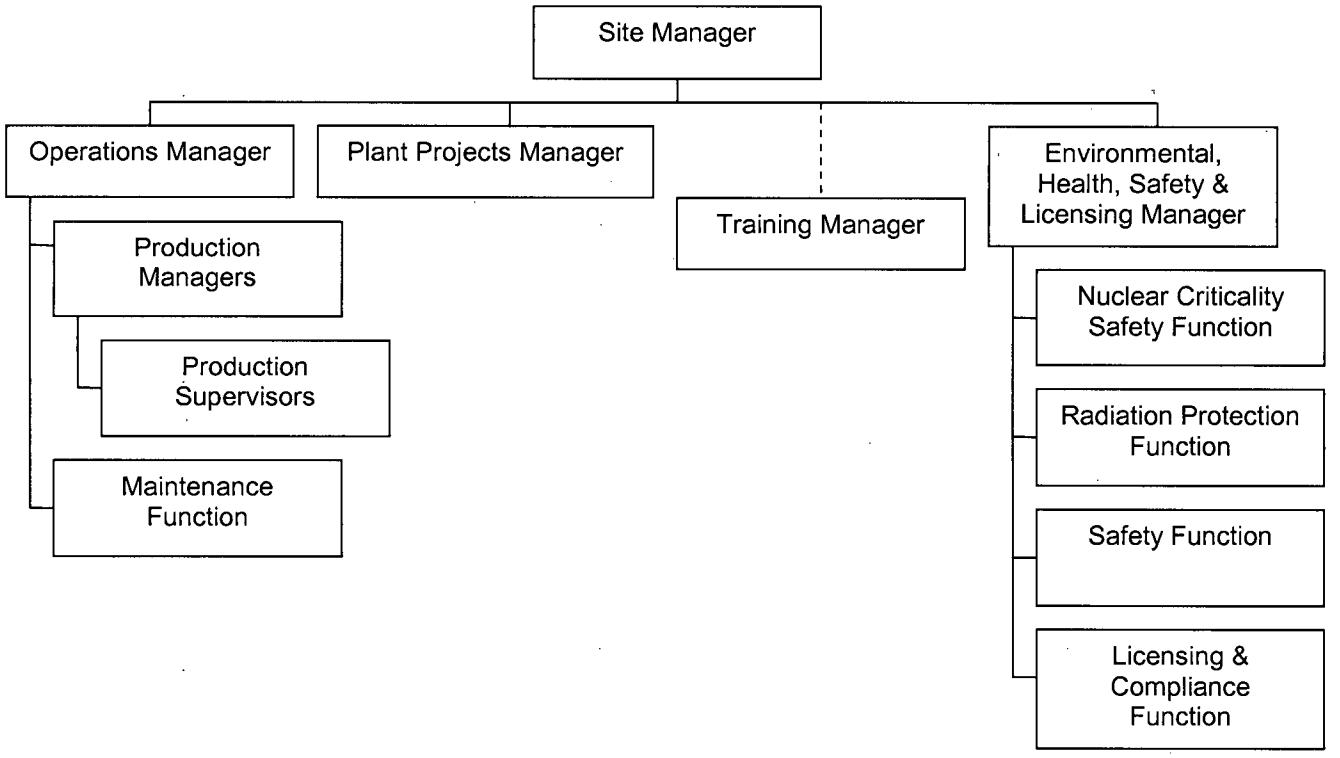
Application Date:	NRC Docket No. 70-1257
October 27, 2006	

2.0 Organization and Administration

2.1 *Site Organization*

The Richland Site Manager has the ultimate responsibility for ensuring that Richland site operations utilizing special nuclear material (SNM) are conducted in a manner that is protective of its workers, the public, and the surrounding environment, and remain in compliance with applicable Federal, State, and local regulations, licenses, and permits. This is accomplished by putting in place an on-site organization with defined accountabilities and assuring that the organization is given the authority and resources to meet its objectives. The primary components of that organization relevant to plant safety, their accountabilities and the key administrative measures utilized to assure safe plant operations are described below. The organization is depicted on a functional basis in Figure 2.1.

Figure 2.1 Site Management Organization



2.2 *Organizational Responsibilities and Authority*

2.2.1 Site Manager

The Site Manager has the overall responsibility for the nuclear fuel manufacturing activities on the Richland site. This includes responsibility for production activities, as well as the responsibility for assuring that those activities are conducted in a manner that is protective of workers, the public, and the environment. These responsibilities shall be discharged by:

- The designation of defined responsibilities to qualified personnel.
- The establishment of mechanisms for the review of program effectiveness.

The Site Manager shall have a bachelors and/or advanced degree in science or engineering, a minimum of two years' experience in the nuclear industry, and at least five years' experience in management. Alternative combinations of education and experience may be acceptable consistent with guidance in American National Standard ANSI/ANS-3.1 (current revision).

2.2.2 Operations Manager

The Operations Manager has overall responsibility for fuel manufacturing activities and, as such, for operations involving the receipt, processing, storage, and shipment of SNM. Inherent in that responsibility is assurance that the operations are conducted safely and in compliance with license conditions. Control shall be established by:

- The designation of defined responsibilities to qualified personnel.
- The assurance that operating personnel are provided adequate work instructions and have been properly trained.
- The prompt correction of non-conforming conditions.

The Operations Manager is also responsible for the plant maintenance function, which includes activities to assure that Items Relied On For Safety (IROFS) are available and reliable when needed.

The Operations Manager shall have a bachelors and/or advanced degree in science or engineering, a minimum of two years' experience in the nuclear industry, and at least five years' experience in management, or a combination of education and experience judged appropriate by the Site Manager.

2.2.3 Production Managers

Production managers have responsibility for nuclear fuel manufacturing activities involving SNM. Those activities entail the safe use and control of SNM from initial receipt, through stages of processing, to ultimate shipment of product or process-related wastes. This authority, with regard to direct production activities, is conducted via a network of production supervisors overseeing trained workers who proceed in accordance with formal operating procedures.

Each production manager shall have a bachelors and/or advanced degree in science or engineering and at least two years' experience in the nuclear industry, or a combination of education and experience judged appropriate by the Operations Manager.

2.2.4 Production Supervisors

Production supervisors are directly responsible for the control of materials, personnel, equipment and activities in specific areas. These responsibilities include assuring that formal approved procedures are available and adhered to by operators and other applicable personnel.

Minimum qualifications for production supervisors shall include a high school education and two years' experience in the nuclear industry. Experience shall include practical application of criticality control and radiological safety techniques, and familiarity with specific applicable limitations imposed on production operations.

2.2.5 Environmental, Health, Safety and Licensing (EHS&L) Function

The EHS&L function has overall responsibility for the development and implementation of programs addressing worker health and safety; environmental protection; and licensing/permitting, including monitoring compliance with those licenses and permits. Technical EHS&L areas addressed within this overall function include nuclear criticality safety; radiation protection; environmental protection; integrated safety analysis; nuclear materials safeguards; industrial hygiene and safety; emergency preparedness; fire protection; and security. This function's responsibility with respect to manufacturing operations is only to confirm the safety of those operations, but it has authority to order shutdown and approve re-start of operations that are judged to be unsafe for continued operation or non-compliant with applicable regulatory requirements.

The individual responsible for the EHS&L function shall have a bachelors and/or advanced degree in science or engineering, with at least five years of experience that would develop an understanding of the health, safety, and environmental aspects of SNM processing activities.

2.2.5.1 Nuclear Criticality Safety Function

The nuclear criticality safety function has responsibility for the development and implementation of a comprehensive nuclear criticality safety program, as defined in Chapter 5.0, "Nuclear Criticality Safety." Key responsibilities include the performance of nuclear criticality evaluations of applicable SNM operations and changes to those operations; establishing limits and controls based on those evaluations; assuring the proper incorporation of limits and controls into applicable work instructions; and monitoring plant compliance with the criticality safety requirements.

The individual responsible for the nuclear criticality safety function shall have a bachelors and/or advanced degree in science or engineering, with at least three years' experience in nuclear criticality safety analysis. The criticality analysts working in the nuclear criticality safety function shall have a degree in science or engineering and are subject to successfully completing a formal internal training and qualification program.

2.2.5.2 Radiation Protection Function

The radiation protection function has responsibility for the development and implementation of a comprehensive program to limit radiological personnel exposures and environmental impacts associated with manufacturing and manufacturing-support activities. This includes the plant ALARA program. The radiation protection function includes a functional manager responsible for program implementation and staff management. Responsibility for program development, program evaluation, and certain other program sectors, e.g., the ALARA program or the bioassay program, may be assigned to other professional staff within the radiation protection

function. If these staff report directly to the manager of the EHS&L function, they must meet the same minimum educational and experience requirements as the function manager (see below).

The radiation protection function also includes the Health and Safety Technicians (HSTs) who perform the day-to-day radiological surveillance activities required in the plant, e.g. workplace air sampling, effluent sampling, and contamination surveys. The HSTs report to the manager of the radiation protection function via an intervening supervisor.

The individual(s) responsible for the radiation protection function shall have a bachelors and/or advanced degree in science or engineering, with at least three years' experience in radiation protection programs. Applicable work experience providing an understanding of radiation protection principles and programs may be substituted for the post-secondary educational requirements on the basis of two years' experience per one year of academic study. Assignment of an individual with no post-secondary education will require a minimum of ten years of applicable work experience. The HSTs shall have a high school diploma or GED equivalent and are subject to successfully completing a formal internal training and qualification program. The HST supervisor shall meet the qualification requirements for an HST and shall have worked as an HST for at least two years or acquired at least two years of other applicable work experience prior to assuming supervisory duties.

2.2.5.3 Safety Function

The safety function has responsibility for industrial safety/hygiene, fire protection, emergency preparedness, and security.

The individual(s) responsible for the safety function shall have a bachelors and/or advanced degree in a technical field, with at least two years' experience in one or more of the safety disciplines included in this function. Applicable work experience providing an understanding of one or more of the pertinent safety disciplines may be substituted for the post-secondary educational requirements on the basis of two years' experience per one year of academic study. Assignment of an individual with no post-secondary education will require a minimum of ten years of applicable work experience.

2.2.5.4 Licensing and Compliance Function

The licensing and compliance function has overall responsibility for acquiring and maintaining environmental, health, and safety-related licenses and permits as required to operate the Richland facility. In this regard, the licensing and compliance function has broad responsibility for interface with regulatory agencies relative to manufacturing-related activities. In addition to this role, this function has technical responsibility for the plant nuclear material accountability and environmental programs. Responsibility relative to radiological environmental programs is shared with the Radiation Protection function.

The individual responsible for the licensing and compliance function shall have a bachelors and/or advanced degree in a technical field, with at least two year' experience in the nuclear or general environmental, safety and health field, or a combination of education and experience judged appropriate by the manager of the EHS&L function.

2.2.6 Plant Projects Function

The plant projects function provides engineering services and support for the facilities, equipment, and peripheral support systems involved in product manufacturing, process development, and

research and development. This involves support for existing equipment and systems, as well as engineering services for modifications and/or additions to plant equipment and facilities. This includes ownership of the plant's configuration management system for equipment, facilities, and systems.

The individual responsible for the plant projects function shall have a bachelors and/or advanced degree in engineering and at least two years' experience in the nuclear industry, or a combination of education and experience judged appropriate by the Site Manager.

2.2.7 Training Function

The training function is responsible for the development, implementation, and administration of plant training programs, including maintenance of the plant training database. The training programs provided and/or coordinated by the training function address qualification of workers to perform work activities involving SNM (work station training) as well as required safety training.

The individual responsible for the training function shall have a bachelors and/or advanced degree and at least two years' experience in technical training or adult education, or a combination of education and experience judged appropriate by the Site Manager.

2.3 *Administration*

2.3.1 Management Measures

AREVA NP has established management measures to ensure that engineered and administrative controls and control systems that are identified as items relied on for safety pursuant to 10 CFR 70.61 (e) are designed, implemented, and maintained to ensure they are available and reliable to perform their function as needed to comply with the performance requirements of 10 CFR 70.61. Those management measures include: 1) configuration management, 2) maintenance, 3) training and qualification, 4) procedures development and implementation, 5) audits and assessments, 6) incident investigation and corrective action, 7) records management, and 8) quality assurance for IROFS.

AREVA NP's programs for provision of these management measures are detailed in Chapter 11, "Management Measures."

2.3.2 Reporting of Unsafe Conditions or Activities

AREVA NP provides to employees a uniform mechanism for the reporting of unsafe conditions or activities to the EHS&L function via the FA Corrective Action Program. The concern is captured via a Condition Report (CR) and entered/managed as an EHS&L Condition. The CR is processed through a screening team with EHS&L representation. The team assigns an issue owner and an importance level that, in turn, defines follow-up investigation/evaluation requirements. Corrective actions are assigned and tracked to completion via the Corrective Action Program.

The reporting of unsafe conditions with immediate emergency implications is addressed in the site emergency plan described in Chapter 8, "Emergency Management."

2.3.3 Off-Site Emergency Response Resources

AREVA NP maintains written agreements with appropriate off-site organizations for the provision of emergency fire, police, ambulance/rescue, and medical services. These agreements are also addressed in Chapter 7, "Fire Safety," and Chapter 8, "Emergency Management."