March 10, 2011

Mr. Gerard Couture, Manager
Licensing and Regulatory Programs
Westinghouse Electric Co., LLC
Nuclear Fuel
Columbia Fuel Site
Drawer R
Columbia, SC 29250

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION REGARDING WESTINGHOUSE REQUEST TO CHANGE INTEGRATED SAFETY ANALYSIS DEFINTIONS (TAC L33069)

Dear Mr. Couture:

We have completed our review of your application to changes Independent Safety Analysis (ISA) definitions transmitted by letter dated (ADAMS Accession Number). Our review has identified that additional information is needed before final action can be taken on you submittal.

On March 3, 2011, after receiving an advance copy of the RAIs, Westinghouse Electric Company, LLC, (Westinghouse) and NRC[1] had a conference call to confirm that a common understanding of the RAIs exists. The NRC staff discussed their expectation for the additional information that is sought. Potential replies to the RAIs were not discussed. As a result, the staff made minor changes to some to the RAIs.

The information, specified in the enclosure, should be provided within 30 days from the date of this letter.

Pending additional information, which answers the Request for Additional Information, we anticipate completing our review by the end of June 2011. This date could change depending on the findings of our technical review, urgent assignments, or other factors. We will promptly communicate any significant changes to this schedule.

If you have any questions regarding this matter, please contact me at (301) 492-3189 or via e-mail at Christopher.Ryder@nrc.gov. Please reference the above TAC No. in future correspondence related to this request.

[1] NRC: Christopher Ryder, Christopher Tripp, Christan Fisher. Westinghouse: Marc Rosser, Gerald Couture, Carl Snyder.

In accordance with Title 10 of the Code of Federal Regulations 2.390 of the NRC's "Rules of Practice," a copy of this letter will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PAR) component of the NRC's Agencywide Document Access Management System (ADAMS). ADAMS is accessible from the NRC Web site at: http://www.nrc.gov/reading-rm/adams.html.

Sincerely,

/RA/

Christopher P. Ryder, Licensing Project Manager
Fuel Manufacturing Branch
Division of Fuel Cycle Safety
and Safeguards
Office of Nuclear Material Safety
and Safeguards

Docket No.: 70-1151
License No.: SNM-1107

Enclosure:
Request for Additional Information

March 10, 2011

In accordance with Title 10 of the Code of Federal Regulations 2.390 of the NRC's "Rules of Practice," a copy of this letter will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PAR) component of the NRC's Agencywide Document Access Management System (ADAMS). ADAMS is accessible from the NRC Web site at: http://www.nrc.gov/reading-rm/adams.html.

Sincerely,

/RA/

Christopher P. Ryder, Licensing Project Manager
Fuel Manufacturing Branch
Division of Fuel Cycle Safety
and Safeguards
Office of Nuclear Material Safety
and Safeguards

Docket No. 70-1151
License No. SNM-1107

Enclosure:
Request for Additional Information

DISTRIBUTION:
FMB R/F MBaker

ML110660024

OFFICE	FMB	FMB	FMB
NAME	CRyder	LAllen	RJohnson
DATE	3/ 09 /11	3/ 09 /11	3/ 10 /11

OFFICIAL RECORD COPY

REQUEST FOR ADDITIONAL INFORMATION
WESTINGHOUSE ELECTRIC COMPANY COLUMBIA FUEL FABRICATION FACILITY
AMENDMENT TO REVISE ISA DEFINTIONS
TAC L33069

1. In interpreting the commitment in Section 1.1.6.22 of the License Amendment, are the sentences in parenthesis to be interpreted the same as the sentences not in parenthesis?

   This information is required to determine compliance with 70.65(b)(9), which includes a definition of credible.

2. Provide an example of how "an external event for which the frequency of occurrence can conservatively be estimated as less than once in a million years," will be used to demonstrate incredibility in a Criticality Safety Evaluation (CSE).

   This information is required to determine compliance with 70.65(b)(9), which includes a definition of credible.

3. Provide an example of how "a process deviation that consists of a sequence of many unlikely upsets, including human actions or errors for which there is no reason or motive (In determining that there is no reason for such actions, a wide range of possible motives, short of intent to cause harm, must be considered. Necessarily, no such sequence of events can have ever actually happened in any fuel cycle facility)," will be used to demonstrate incredibility in a CSE.

   This information is required to determine compliance with 70.65(b)(9), which includes a definition of credible.

4. Provide an example of how "process deviations for which there is a convincing argument, given physical laws, that they are not possible or are unquestionably extremely unlikely (The validity of the argument must not depend on any feature of the design or materials controlled by the facility's system of SSCs [safety significant controls] or management measures)," will be used to demonstrate incredibility in a CSE.

   This information is required to determine compliance with 70.65(b)(9), which includes a definition of credible.

Enclosure

5. Provide an example of how the definition in the License Application Section 1.1.6.38, “unlikely event,” will be used at the working level and why the definition is different from the definition on page 7-15 of your ISA Handbook.

   This information is required to determine compliance with 70.65(b)(9), which includes a definition of credible.

6. Provide an example of “human actions or errors for which there is no motive”, and how this would be used at the working level.

   This information is required to determine compliance with 70.65(b)(9), which includes a definition of credible.

7. Provide a definition of “unquestionably extremely unlikely” and an example of how this would be used at the working level.

   This information is required to determine compliance with 70.65(b)(9), which includes a definition of credible.

8. Clarify if three “sets of qualities” are the only sets that will be used to define an event as incredible.

   This information is required to determine compliance with 70.65(b)(9), which includes a definition of credible.

9. Will controls, either Items Relied on for Safety (IROFS) or safety significant controls (SSCs), be placed on incredible events, as mentioned in NCS-017.

   This information is required to determine compliance with 70.65(b)(9), which includes a definition of credible.

10. Provide a definition of “design features” as used in NCS-017.

    This information is required to determine compliance with 70.65(b)(9), which includes a definition of credible.

11. Provide an example of “some design features of the system [that] may be implicitly credited in incredibility determinations,” as mentioned in NCS-017.

    This information is required to determine compliance with 70.65(b)(9), which includes a definition of credible.