

DOCKET: 70-1257

LICENSEE: AREVA NP, RICHLAND FACILITY

SUBJECT: SAFETY EVALUATION REPORT: AMENDMENT TO LICENSE NO. SNM-1227;
CHANGES TO CHAPTER 2.0, ORGANIZATION AND ADMINISTRATION;
AREVA NP RICHLAND FACILITY (DOCKET NO. 70-1257)

I. INTRODUCTION

By letter dated February 14, 2011, AREVA NP, Richland Facility (Areva) submitted an application (Agencywide Documents Access and Management System Accession No. ML1104704180) to the U.S. Nuclear Regulatory Commission (NRC) requesting changes to the Richland site management's 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. AREVA's plan is to eliminate the position referred to in Section 2.1 as the Fuel America (FA) Vice President, Manufacturing. The request is made pursuant to the requirements in Title 10 of the *Code of Federal Regulations* (10 CFR), Section 70.34.

The NRC staff conducted its safety and safeguards review in accordance with 10 CFR Part 70, "Domestic Licensing of Special Nuclear Material;" 10 CFR Part 51, "Environmental Protection Regulations for Domestic Licensing and Related Regulating Functions;" and other applicable regulations.

The NRC staff used guidance in NUREG-1520(Rev.1), "Standard Review Plan for the Review of a License Application for a Fuel Cycle Facility" (NRC, 2010) and other applicable guidance documents to conduct its safety review. The NRC staff's safety review included the review of Chapter 2.0, "Organization and Administration" and applicable sections that may be affected by the requested change.

AREVA 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.

The NRC staff concludes, that AREVA's organizational changes and removal of the Vice President of Manufacturing position will not affect the adequate basis for the safety and safeguards of facility operations; and that continued operation of the facility does not pose an undue risk to the worker or public health and safety.

II. DISCUSSION

Organization and Administration

The current administrative structure of AREVA consists of a Site Manager that reports to the Vice President of Manufacturing that had the ultimate responsibility for ensuring operations utilizing special nuclear material (SNM) is conducted in a manner that is protective of its workers, the public, and the surrounding environment—and remains in compliance with applicable regulations, licenses and permits. The license application describes the qualifications of the individuals in these positions, such as education requirements and professional experience. The requested change does not alter any of these requirements; it will only rearrange the reporting relationships at the management levels.

The amendment will eliminate the position of Vice President of Manufacturing and will transfer duties and responsibilities to the Richland Site Manager. Therefore, the proposed changes do not result in any foreign ownership, control, or influence related to the operations of the Richland facility. Another minor change is reflected in the training and experience requirements of a Site Manager's qualifications. AREVA's Site Manager's education and experience are to be consistent with guidance in American National Standard ANSI/ANS-3.1(2010). Committing to ANSI/ANS-3.1, endorsed by NRC Regulatory Guide 1.8, is an acceptable method for demonstrating that staff is adequately trained for their licensed activities.

The NRC staff agrees that the proposed change will not adversely impact the safe utilization of SNM on the Richland site. As is currently the case, the Richland Site Manager will maintain the designated role as the onsite AREVA 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.

The NRC staff reviewed the license amendment and finds that AREVA has proposed an acceptable organization that provide reasonable assurance that the activities at the Richland facility will continue in a manner that protects public health and safety, and the environment.

III. ENVIRONMENTAL ASSESSMENT

The NRC staff determined that the proposed changes to the license application and organization do not individually or cumulatively have a significant effect on the human environment because this change will have no impact on the safe utilization of SNM onsite. The proposed action is categorically excluded in accordance with 10 CFR 51.22(c) (11); therefore, neither an environmental assessment nor an environmental impact statement is warranted for this action.

IV. CONCLUSION

The NRC staff concludes that the changes and organizational restructure provided by AREVA in their license amendment application provide reasonable assurance of adequate safety of the fuel fabrication facility operations. The NRC staff concludes that the proposed changes in management positions at AREVA Richland facility will not have an adverse impact on the public health and safety, the common defense and security, or the environment: and meet the applicable requirements in 10 CFR Parts 51 and 70.

V. REFERENCES

ANSI/ANS-3.1-2000, "Selection, Qualification, and Training of Personnel for Nuclear Power Plants."

(NRC, 2010) U.S. Nuclear Regulatory Commission, NUREG-1520(Rev.1), "Standard Review Plan for
The Review of a License Application for a Fuel Cycle Facility."

(NRC, 2003) Environmental Review Guidance for Licensing Actions Associated with NMSS Programs (NUREG-1748), August 2003.