

From: Mattern, Kevin
Sent: Tuesday, April 05, 2011 4:41 PM
To: Toelle, Steven A
Cc: Shanks, Vernon; Boren, Mike; Liu, Tilda
Subject: DRAs for December 15, 2010 CAR Related to the Decrease in Minimum Staffing Requirements for C-360

(PLEASE NOTE THAT THIS E-MAIL WILL BE MADE PUBLICLY AVAILABLE IN ADAMS)

Mr. Steven A. Toelle, Director, Regulatory Affairs
United States Enrichment Corporation (USEC)

SUBJECT: Draft Requests for Additional Information – USEC Letter Dated December 15, 2010, Regarding USEC PGDP Certificate Amendment Request (CAR) to Revise Technical Safety Requirements (TSR) 2.1.1, 2.1.4.13, and 2.1.4.14, and Table 3.2.2-1, Related to the Decrease in Minimum Staffing Requirements for the Toll Transfer and Sampling facility (C-360) by Allowing a Reduction in the Minimum Number of Operators During Modes 2A, 2B, 6 and 7

Steve,

The NRC staff is in the process of conducting its review of your submittal to determine if the requested changes to your licensing basis documents in your certificate amendment request continue to ensure adequate protection of public health and safety and the environment. As you know, the review process allows the staff the opportunity to request additional information (RAI) which is not provided in the original submittal in order to complete a detailed technical review.

The NRC staff has initially determined that the information provided herein is required to complete its detailed technical review. However, before issuing formal RAIs by letter, you have an opportunity to offer additional clarification regarding your submittal.

The draft requests for additional information (DRAs) are included in this EMAIL.

The staff will plan to set-up a telephone call with Mr. Shanks and/or Mr. Boren at your convenience to offer any clarification necessary for USEC to fully understand the intent and scope of the staff's DRAs while also allowing an opportunity for USEC to clarify its submittal to address the areas identified in the DRAs. At the conclusion of the phone call the NRC staff may issue any of the RAIs formally or may conclude that the clarification provided is sufficient and the particular RAI is no longer warranted.

A copy of this EMAIL will be placed on the docket and made available to the public.

If you have any questions, please contact me at (301) 492-3221 or via email at kevin.mattern@nrc.gov, or my colleague Tilda Liu at (301) 492-3217 or via e-mail at tilda.liu@nrc.gov.

Kevin Mattern

Docket No.: 70-7001
License No.: GDP-1

Draft Requests for Additional Information (DRAIs)

1) In the “Justification of Changes” section of enclosure 2 of the submittal, it is stated that, “[T]he accident analysis does not credit any operator actions during these accident scenarios other than to evacuate the area and notify the PSS.” SAR Page 4.3-101 also states that: “[N]o actions are required in the C-360 facility because automatic detection of the lines are provided.” Contrary to the above, SAR pages 4.3-96, 4.3-101, 4.3-102, and 4.3-103 describe required mitigative operator action, operator training, and manual isolation. Provide clarification that all references to “operator action” in Accident 4.3.2.2.10 in the PGDP SAR do not refer to any accidents in the C-360 facility. If “operator action” is in fact required for any accident in the C-360 facility provide additional justification for reducing staffing requirements and associated additional mitigative measures.

2) Based on page 4.3-95 of the SAR which states that “[D]uring these operating modes, multiple operator errors or equipment malfunctions could occur that could result in a pigtail failure and a release of UF₆,” it is unclear that potential initiators for the relevant accidents are not adversely affected even though the initial conditions may not be affected. While the staffing changes may not affect the accident analysis or response, provide further justification to demonstrate that the reduction in staff does not decrease operational effectiveness and potentially increase accident frequency, specifically in mode 2A, 6A and 6B.

3) The current submittal states: “[C]ompliance with the TSR is expected regardless of how many operators are present in C-360.” Provide additional justification other than, “since no operations are performed during this mode,” as to why a change from 2 operators required to 0 operators required for mode 2B would continue to maintain the same level of effectiveness of the plant’s safety programs and ensures compliance with the TSR.

4) Provide additional justification for amending the TSRs to decrease the minimum staffing requirements from 43 to 40 for the C-360 facility immediately following the previously approved increase in the maximum number of hours for an individual worker from 24 to 26 in a 48 hour period. Discuss the synergistic effects of these two licensing actions, specifically, whether or not an increase in the probability of occurrence of evaluated accidents and/or a decrease in the margin of safety would result from these related changes. Provide justification that these related changes would ensure that adequate shift coverage will be maintained without routine heavy use of overtime as per SAR section 3.2.2.