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Security-Related Information Notice

This letter forwards security-related sensitive information which is to be withheld from public disclosure in accordance with 10CFR2.390 and NRC RIS 2005-31. The balance of this letter may be considered non-sensitive upon the removal of all of Attachment 1

SPM 11-025

July 1, 2011

ATTN: Document Control Desk Director, Office of Nuclear Material Safety & Safeguards U.S. Nuclear Regulatory Commission Washington, D.C. 20555-0001

Subject: GNF-A ISA Action Plan Status and IROFS List

References: (1) License SNM-1097, Docket 70-1113

(2) Letter, S.P. Murray to R. P. Zimmerman, 7/23/10, Reply to NOV

(3) Letter, S.P. Murray to R. P. Zimmerman, 1/28/11, Revised Schedule to Complete NOV Actions.

(4) Letter, S. P. Murray to NRC Document Control Desk, 4/29/11, 30 Day Report of Event – Completion of ISA Action Plan Conversion Milestone

Global Nuclear Fuel – Americas, LLC (GNF-A) in Wilmington, NC committed to an action plan which included a comprehensive review of the Integrated Safety Analysis (ISA) to address specific issues associated with the ISA (Reference 2). The milestones for completion of the ISA review and subsequent implementation of the revised safety basis were modified from the original ISA action plan as described in References 3 and 4.

The revised ISA for the Conversion area has been completed and implemented per the revised ISA action plan schedule.

The revised ISA action plan and 30-day report contain a commitment to provide the NRC Staff with a listing of all safety controls re-designated as items relied on for safety (IROFS) at the completion of each ISA implementation milestone. Attached is a list of all IROFS associated with the Conversion area (Attachment 1). The list of IROFS identifies both existing IROFS that are still credited in the ISA as well as those existing safety controls that have been redesignated as IROFS. Management measures have been applied to all IROFS in accordance with GNF-A ISA procedures.

Global Nuclear Fuel

Scott P. Murray
Manager, Licensing and Liabilities

3901 Castle Hayne Road P.O. Box 780, Mail Code K-84 Wilmington, NC 28402 USA

T 910 819 5950 F 910 362 5950 Scott.Murray@ge.com Per discussion with the NRC Staff, an interim ISA Summary document describing the revised safety basis will be submitted for the Staff's review in the coming months. The interim ISA Summary document will describe the results of the ISA for the Conversion area utilizing the new ISA methodology.

Pursuant to NRC Regulatory Issue Summary 2005-31, GNF-A requests that Attachment 1 to this letter be withheld from public disclosure under 10 CFR 2.390 as it contains security-related sensitive information associated with our safety analyses & risk assessments.

Please contact me on (910) 819-5950 if you have any questions or would like to discuss this matter further.

Sincerely,

S. P. Murray, Manager Licensing and Liabilities

Commitments: Submit updated ISA Summary document

Attachment: 1) List of IROFS for the Conversion Area (security-related information)

cc: M. Sykes, NRC Region II, Atlanta

M. L. Thomas, NRC Region II, Atlanta, GA

M. N. (Nick) Baker, NRC NMSS, Washington, D.C.