SAFETY EVALUATION REPORT

REVISION TO LICENSE APPLICATION FOR THE AMERICAN CENTRIFUGE LEAD CASCADE FACILITY AND LICENSE APPLICATION AND DECOMMISSIONING FUNDING PLAN FOR THE AMERICAN CENTRIFUGE PLANT TO AUTHORIZE POSSESSION AND USE OF RADIOACTIVE SOURCE AND BYPRODUCT MATERIAL CALIBRATION SOURCES

LICENSEE: USEC Inc., American Centrifuge Plant and American Centrifuge Lead Cascade Facility, Piketon OH

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1. INTRODUCTION

In a letter and application dated June 3, 2011 (publicly available via the Agencywide Documents Access and Management System (ADAMS) Accession No. ML11160A088), USEC Inc., (USEC) requested amendments to the License Application for the American Centrifuge Lead Cascade Facility (Lead Cascade) and the License Application and Decommissioning Funding Plan (DFP) for the American Centrifuge Plant (ACP) to authorize possession and use of radioactive source and byproduct material calibration sources. The sources are needed to support ongoing operations at the Lead Cascade.

2. BACKGROUND

On February 13, 2004, the U.S. Nuclear Regulatory Commission (NRC) approved USEC's request to utilize the Portsmouth Gaseous Diffusion Plant's (PORTS) NRC Certificate of Compliance for possession and use of source and byproduct material calibration sources needed to support operations at the Lead Cascade. Since then, the United States Enrichment Corporation (the Corporation) Government Services (GS) has been providing calibration services at the Lead Cascade using these sources.

Currently, the Corporation is in the process of terminating its NRC Certificate of Compliance and, as part of this process, it will transfer the remaining leased facilities at PORTS to the U.S. Department of Energy (DOE) in accordance with the Lease Agreement between the Corporation and DOE for decontamination and decommissioning. In accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) Part 70.72, USEC evaluated the planned termination of GS operations under the NRC Certificate of Compliance and what affect the proposed changes will have upon the services provided to the Lead Cascade. USEC's evaluation determined that, in order to continue using the source and byproduct material calibration sources, it would need to request a license amendment authorizing the possession and use of the calibration sources.

3. USEC'S REQUEST

USEC's June 3, 2011, submittal requested NRC's approval to use the ACP materials license in lieu of the PORTS NRC Certificate of Compliance for possession and use of source and byproduct material calibration sources needed to support ongoing operations at the Lead Cascade, and submitted the proposed changes to the Lead Cascade License Application and the ACP License Application and DFP. The proposed changes include: 1) the replacement of any reference of the PORTS NRC Certificate of Compliance with the ACP materials license regarding these calibration sources; and 2) the reference of the calibration sources in the text and associated tables regarding radioactive waste disposal and decommissioning costs. These same calibration sources needed for the Lead Cascade are a subset of the calibration sources needed for the ACP, and would be controlled in accordance with ACP License Application requirements and plant procedures.

4. NRC STAFF'S EVALUATION OF USEC'S REQUEST

4.1 RADIATION PROTECTION PROGRAM

In its June 3, 2011, request, USEC did not propose any changes to its currently approved Radiation Protection Program (RPP). In its request, USEC stated that the proposed changes would not increase radiological or chemical releases beyond applicable regulatory limits, and the proposed changes would not create any new or unusual sources of waste. In its request USEC also stated that the sources were to be used by qualified individuals and that source and byproduct material calibration sources would not pose a significant increase in individual or cumulative occupational radiation exposure. In addition, USEC's request provided a description of the byproduct and source material calibration sources it intends to possess and use under the ACP license to support operations at the Lead Cascade.

4.1.1 REGULATORY REQUIREMENTS

The regulations in 10 CFR Part 20, "Standards for Protection Against Radiation," describe the general requirements for protection against radiation.

The regulations in 10 CFR 20.1101, "Radiation Protection Programs," describe the requirements for developing, documenting, and implementing an RPP to ensure occupational doses, and that doses to the members of the public are as low as reasonably achievable.

The regulations in 10 CFR 20.1201, "Occupational Dose Limits for Adults," describe the requirements for limiting occupational exposures of adult individuals involved in activities conducted under licenses issued by the NRC.

The regulations in 10 CFR 20.1801, “Security of Stored Material,” require licensees to secure licensed materials stored in controlled or unrestricted areas from unauthorized removal or access.

The regulations in 10 CFR 20.1802, “Control of material not in storage,” require licensees to control and maintain constant surveillance of licensed material that is in a controlled or unrestricted area and that is not in storage.

The regulations in 10 CFR 20.1902, “Posting Requirements,” (a) describe the requirements for posting of radiation areas.

The regulations in 10 CFR 20.1904, “Labeling Containers,” describe the requirements for labeling containers where radioactive materials are being stored or contained.

The regulations in 10 CFR 20.2102, “Records of Radiation Protection Programs,” describe the requirements for keeping records of information and other activities conducted under a license issued by the NRC.

The regulations in 10 CFR 30.33, “General Requirements for Issuance of Specific Licenses,” (a)(3), require that the licensee be qualified by training and experience to use the radioactive materials in such manner as to protect health and minimize danger to life or property.

The regulations in 10 CFR 40.32, “General Requirements for Issuance of Specific Licenses (b), require that the licensee be qualified by training and experience to use the radioactive materials in such manner as to protect health and minimize danger to life or property.

4.1.2 NRC STAFF’S EVALUATION

The NRC staff reviewed USEC’s June 3, 2011, submittal and the existing License Application for the ACP (ADAMS Accession No. ML043620254), which has been previously reviewed and approved by the NRC (see NUREG-1851), to determine if the use and possession of source and byproduct material calibration sources at the ACP would pose any unnecessary risks to public health and safety. The NRC staff also performed a limited scope operational readiness review to evaluate ACP’s compliance with its radiation protection program and the regulations in 10 CFR Parts 20, 30, and Part 40.

The ACP License Application provides a description of procedures governing the control of the sources at the ACP, which are based on procedures currently in place at PORTS. These procedures have been in effect for several years, and are applicable, and have been implemented, for both the Lead Cascade and the ACP. In its request, USEC stated that the source and byproduct material calibration sources would be controlled in accordance with these existing procedures. Therefore, based on the information provided and the review of the information in the ACP’s License Application, the NRC staff concluded that operations involving the use of the calibration sources, as

authorized by the ACP License, would continue with negligible difference from existing practices.

To verify its conclusion, the NRC staff conducted an onsite limited scope operational readiness review (ORR). During the ORR the NRC staff evaluated the ACP's compliance with labeling requirements for each calibration source and their common storage container in the ACP, and how the sources are being controlled. The NRC staff also observed ACP staff performance and their adherence to ACP Procedure ACD2-HP-012, Radioactive Source Control, which describes the ACP's process and activities required for handling and managing the control of sealed radioactive calibration sources and source material, as well as for inventory, labeling, storage, movement, integrity testing, purchasing, receiving, and disposal of sources activities. The NRC staff also reviewed the ACP's records on staff training and on the activities described in ACP Procedure ACD2-HP-012.

The NRC staff evaluated the licensee's compliance with labeling requirements for each calibration source and their common storage container in the ACP. The sources used for the demonstration were stored at another location at PORTS and were brought to ACP building X-3012 for the NRC inspection. The sources will be permanently transferred to and stored within building X-3012, second floor in the health physics (HP) office. The sources will be used within the ACP building complex and the X-7725 (Tenelec room 156). The sources bear a label with a radiation symbol. The label provides information on the radioactive source such as the isotope and activity at the date when the source was fabricated. The sources will be placed in a locked metal box that is stored inside a cabinet. The cabinet is located in a security-controlled area within the HP offices in building X-3012. Each of the HP technicians has been assigned a key to the lock allowing access to the sources stored in the box. The technicians maintain possession of their key at all times. The NRC staff also observed that the storage container was properly labeled with a radiation symbol. Based upon observations and personnel interviews, the NRC staff concluded that the sources and storage cabinet were adequately labeled and that the labels contained the required information, and that the sources were appropriately controlled to avoid unauthorized removal or access to the sources.

The NRC staff observed the activities and performance of several HP technicians on duty while performing daily operational checks of radiological instrumentation using the following three calibration sources in the X-3012 building: 1) alpha/Th-230, 2) beta/Sr-90 (low energy), and 3) gamma/Sr-90 (high energy). Based on its observations, the NRC staff determined that the HP technicians demonstrated adequate skills in the use of calibration sources and in the use of radiological instrumentation. In addition, the NRC staff concluded that the HP technicians' actions while handling the sources were appropriate and consistent with those described in ACP Procedure ACD2-HP-012.

The NRC staff also reviewed the ACP's records on the training requirements and current training status of the HP technicians. USEC maintains a training database used for tracking the training requirements and status of all HP technicians. The database is capable of providing notifications of upcoming training requirements and any past due

conditions. NRC inspectors reviewed the training database and interviewed the HP technicians. Based on the NRC review of training qualifications, training records, and interviews, the NRC staff concluded that the HP technicians were fully qualified by training, training records indicated that their training was current and commensurate with the scope of their activities.

The NRC staff evaluated the licensee's activities regarding the control of six calibration sources, including inventory management, leak testing and recordkeeping, that will be transferred from PORTS to DOE, and finally to the ACP. These sources are identified below:

1. Source No. 9-672, Th-230, S/N C533/91
2. Source No. 9-930, Tc-99, S/N 1533/93
3. Source No. 9-1428, Th-230, S/N 93TH470-1503
4. Source No. 9-1429, Sr-90, S/N 93SR470
5. Source No. 9-1483, Sr-90, S/N 1222/91
6. Source No. 9-2031, Sr-90, S/N Z-552

Inventory management, leak testing and recordkeeping activities are currently managed by PORTS using a proprietary software package. These activities are currently being conducted by either PORTS or ACP technicians but will be eventually transitioned to ACP's radiological technicians. The ACP staff will assume the management of these activities using an existing computerized maintenance management system, an existing electronic document management system, and a proprietary spreadsheet. Based on its evaluation, the NRC staff concluded that inventory of sources was routinely performed, that calibration sources were adequately controlled, leak tests were routinely performed, and records of these activities and tests were appropriately maintained.

The NRC staff also reviewed PORTS and ACP records on calibration source transfer, receipt, and movement. PORTS and ACP both maintain proprietary databases that track these activities and all information on each calibration source. Based on the review of the information within the databases and interviews of HP personnel and management, the NRC staff concluded that ACP (and PORTS) adequately retains records on the transfer, receipt, and movement of sources, and that the records provide accurate and complete information on these activities.

In conclusion, based on its review of the information provided by USEC in its June 3, 2011, request, the review of applicable regulations in 10 CFR Parts 20, 30, and 40, and the results of the limited scope operational readiness review, the NRC staff concluded that operations involving the use of the calibration sources, as authorized by the ACP License, would continue with negligible difference from existing practices. The NRC staff also concluded that the calibration sources were adequately labeled and that the labels contained the required information, in accordance with the licensee's procedure and the regulations in 10 CFR 20.1904, that the sources' storage cabinet was adequately labeled, in accordance with the licensee's procedure and the regulations in 10 CFR 20.1902(a), and that the calibration sources will be appropriately controlled in

accordance with the licensee's procedure and the regulations in 10 CFR 20.1801 and 20.1802. In addition, the NRC staff concluded that the HP technicians are fully qualified by training and experience to adequately use the calibration sources and radiological instrumentation, and that their actions while handling the sources were in accordance with licensee procedures and the regulations in 10 CFR 30.33(a)(3) and 40.32(b). The NRC staff also concluded that doses to workers would be maintained as low as reasonably achievable, in accordance with 10 CFR 20.1201. The NRC staff also concluded that USEC would maintain appropriate records of licensed activities regarding the use of the calibration sources in accordance with licensee procedures and the regulations in 10 CFR 20.2102.

4.2 DECOMMISSIONING FINANCIAL ASSURANCE

USEC's June 3, 2011, request describes the specific sealed source and byproduct material calibration sources it would possess and use under its existing ACP license. In its request, USEC stated, and provided its calculations to demonstrate, that the quantities and types of calibration sources needed to support Lead Cascade's operations are below the threshold limits for requiring decommissioning final assurance. With their request, USEC submitted a revised DFP for the ACP to address the decommissioning and disposal of the source and byproduct material calibration sources.

4.2.1 REGULATORY REQUIREMENTS

Byproduct materials are licensed under 10 CFR Part 30, "Rules of General Applicability to Domestic Licensing of Byproduct Material." The regulations in 10 CFR 30.35, "Financial assurance and recordkeeping for decommissioning," (a)(2) requires, in part, that holders of, or applicant for, any specific license authorizing the possession and use of sealed sources of half-life greater than 120 days and in quantities exceeding 10^{12} times the applicable quantities set forth in appendix B to part 30 shall submit a decommissioning funding plan as described in paragraph (e) of this section. A DFP consists of a site-specific cost estimate for decommissioning the facility and an acceptable financial assurance instrument in the amount of the cost estimate.

Source material is licensed under 10 CFR Part 40, "Domestic Licensing of Source Material." The regulations in 10 CFR 40.36, "Financial assurance and recordkeeping for decommissioning," (b)(1) requires, in part, that applicants for a specific license authorizing possession and use of quantities of source material greater than 10 mCi but less than or equal to 100 mCi in a readily dispersible form shall submit a decommissioning funding plan[1]. A DFP consists of a site-specific cost estimate for decommissioning the facility and an acceptable financial assurance instrument in the amount of the cost estimate.

[1] The NRC staff notes that 10 CFR 40.36 does not apply for the purpose of possessing and using sealed source material calibration sources for the following reasons: 1) it only applies to readily dispersible source material; and 2) even if the source material was unsealed, the amount of source material being proposed by USEC is below the 10 mCi threshold specified in 10 CFR 40.36.

4.2.2 NRC STAFF'S EVALUATION

The NRC staff evaluated USEC's request to determine if the calibration sources would require decommissioning financial assurance. Based on its review of the submittal, the NRC staff finds that the proposed quantities and types of source and byproduct material calibration sources, by themselves, are below the thresholds for requiring decommissioning financial assurance, as stated in 10 CFR 30.35(a)(2); and 10 CFR Part 30, Appendix B; and 10 CFR 40.36. The NRC staff reviewed the revisions to the DFP and cost estimate submitted with USEC's request and finds that the revisions are reasonable, are based on the cost of a third party, include a 25-percent contingency, and do not take credit for salvage value. Therefore, the revisions to the ACP DFP are acceptable.

Section 10.3.2.2 of the ACP Safety Evaluation Report (NUREG-1851) discusses USEC's request for an exemption from the requirements in 10 CFR 40.36 and 70.25, to allow incremental funding for decommissioning. In response, the NRC staff imposed LCs 16 and 17, which specify the schedule and contents of decommissioning financial assurance submittals. The NRC staff compared USEC's request to LCs 16 and 17, which, among other things, require updates to the DFP, cost estimate and depleted uranium disposition estimate on an annual, forward-looking basis. Based on its review, the NRC staff finds that the receipt of the described source and byproduct material calibration sources would require such annual updates. However, the NRC staff finds that it would be overly burdensome on the licensee to provide such updates at this time, as the source and byproduct material calibration sources, by themselves, do not require financial assurance.

4.2.2.1 ACP LICENSE CONDITIONS

The NRC staff evaluated USEC's request to determine if the addition of source and byproduct material calibration sources to the ACP license would require amending LCs 16 and 17. Based on its review, the NRC staff finds that LCs 16 and 17 would need to be revised to clarify the financial assurance requirements with respect to the possession and use of source and byproduct material calibration sources. The suggested changes to the existing LCs 16 and 17 from Special Nuclear Materials License (SNM)-2011, Amendment 1 (ML091890795) are underlined below:

16. USEC shall provide final copies of the proposed financial assurance instruments to NRC for review at least six months prior to the planned date for obtaining licensed material (except for the sealed source and byproduct material calibration sources described in LC 6), and provide to NRC final executed copies of the reviewed financial assurance instruments prior to the receipt of licensed material (except for the sealed source and byproduct material calibration sources described in LC 6). The amount of the financial assurance instrument shall be updated to current year dollars and include any applicable changes to the decommissioning cost estimate. The decommissioning cost estimate shall include an update to USEC's Analysis of Depleted Uranium Disposal Costs for the ACP. To develop this update, USEC shall coordinate with DOE to determine necessary changes to the DOE contractor's depleted uranium cost estimate

utilized as input to the USEC specific analysis.

17. The initial and subsequent updated Decommissioning Funding Plan (DFP) cost estimates, up to the time of full capacity operations, and revised funding instruments shall be provided annually and shall provide full funding for decontamination and decommissioning of the full-size facility, except:

    (1) The cost estimate for decontamination and removal of the centrifuges shall be provided on an annual forward-looking basis based on planned incremental enrichment capacity increases; and

    (2) The cost estimate for depleted uranium byproduct generation shall be provided on a projected annual forward-looking basis. The decommissioning cost estimate shall include an update to USEC's Analysis of Depleted Uranium Disposal Costs for the ACP. To develop this update, USEC shall coordinate with DOE to determine necessary changes to the DOE contractor's depleted uranium cost estimate utilized as input to the USEC specific analysis.

    Once full capacity operation is achieved, the licensee shall provide cost estimates for depleted uranium byproduct generation on an annual forward-looking basis and cost estimates for decontamination and decommissioning the remainder of the facility at intervals not to exceed 3 years, consistent with the requirements of 10 CFR 30.35(e), 40.36(d) and 10 CFR 70.25(e). The DFP cost estimates shall be provided to NRC for review, and subsequently, after resolution of any NRC comments, final executed copies of the financial assurance instruments shall be provided to NRC.

The NRC staff emphasizes that USEC is not relieved from the requirements described in LCs 16 and 17. If, at any time, the amount of material currently at the site, including the source and byproduct material calibration sources, plus the amount of material that USEC is scheduled to receive within six months, is in an amount that would require financial assurance, the annual forward-looking updates to the DFP, cost estimate, and depleted uranium disposition estimate are still required per LCs 16 and 17.

4.3 MATERIAL CONTROL AND ACCOUNTING PROGRAM

With regard to its Material Control and Accounting Program (MC&A), USEC did not propose any changes to its Fundamental Nuclear Material Control Plan (FNMCP) for the Lead Cascade or the ACP. In its June 3, 2011, request USEC stated that the sealed source material calibration sources would be controlled in accordance with ACP License Application Chapter 4, Section 8.3, Radioactive Source Control, and current plant procedures.

4.3.1 REGULATORY REQUIREMENTS

The regulations in 10 CFR 74.33, "Nuclear Material Control and Accounting for Uranium Enrichment Facilities Authorized to Produce Special Nuclear Material of Low Strategic Significance," (a)(1) state the following:

> (a) General performance objectives. Each licensee who is authorized by this chapter to possess equipment capable of enriching uranium or operate an enrichment facility, and produce, possess, or use more than one effective kilogram of special nuclear material of low strategic significance at any site or contiguous sites, subject to control by the licensee, shall establish, implement, and maintain a NRC-approved material control and accounting system that will achieve the following objectives:
>
> (1) Maintain accurate, current, and reliable information of and periodically confirm the quantities and locations of source material and special nuclear material in the licensee's possession;

4.3.2 NRC STAFF'S EVALUATION

The NRC staff reviewed USEC's submittal, the information in Chapter 4 of the ACP License Application (previously approved by the NRC), the current FNMCP for the ACP, and the regulations in 10 CFR 74.33 to determine if USEC's MC&A program provides adequate assurance of full control of all source material under its possession, and that the proposed changes would not decrease the overall effectiveness of the program.

During its evaluation the NRC staff determined that, as stated in the approved FNMCP, and confirmed during the ORR, USEC does maintain a program to control and account for source materials possessed under the ACP license, in accordance with the provisions of 10 CFR 74.33(a) and its approved License Application. The NRC staff also confirmed that no changes to the ACP's MC&A and FNMCP were being proposed and, as such, concluded that the possession and use of the source material calibration sources will have no affect on the FNMCP for the Lead Cascade or the ACP. Therefore, based on its review of the information provided in USEC's submittal, the information in Chapter 4 of the ACP License Application and in the currently approved FNMCP for the ACP, and the regulations in 10 CFR 74.33, the NRC staff concluded that the proposed changes would not decrease the overall effectiveness of USEC's MC&A program. The staff also concluded that the proposed changes would not adversely impact the FNMCP for the Lead Cascade or the ACP and is consistent with the regulations in 10 CFR 74.33(a)(1).

4.5 ENVIRONMENTAL REVIEW

The NRC regulations in 10 CFR 51.22, "Criterion for Categorical Exclusion; Identification of Licensing and Regulatory Actions Eligible for Categorical Exclusion or Otherwise Not

Requiring Environmental Review," provides a list of actions excluded from an environmental review required by the National Environmental Policy Act. Specifically, 10 CFR 51.22(c)(11) states the following:

> (14) Issuance of amendments to licenses for fuel cycle plants and radioactive waste disposal sites and amendments to materials licenses identified in Part 51.60(b)(1) which are administrative, organizational, or procedural in nature, or which result in a change in process operations or equipment, provided that (i) there is no significant change in the types or significant increase in the amounts of any effluents that may be released offsite, (ii) there is no significant increase in individual or cumulative occupational radiation exposure, (iii) there is no significant construction impact, and (iv) there is no significant increase in the potential for or consequences from radiological accidents.

The staff has determined that the proposed changes are administrative, organizational, or procedural in nature, and that the changes will not result in a significant increase in individual or cumulative occupational radiation exposure, and will not have a significant impact on the human environment. Therefore, in accordance with 10 CFR 51.22(c)(11), neither an environmental assessment nor an environmental impact statement is required for the proposed action.

5.0 CONCLUSION

Based on the NRC staff's review and evaluation of the information provided by USEC in its June 3, 2011, request, the review of all applicable regulations, and the results of the limited operational readiness review, the NRC staff concludes that the proposed changes to the Lead Cascade's License Application and the ACP's License Application and DFP for possession and use of source and byproduct material sources would not pose any adverse impact on public health and safety, and are acceptable and consistent with the regulations in 10 CFR Parts 20, 30, 40, and 74.

With regards to the licensee's RPP, the NRC staff concludes that the licensee's RPP would ensure that doses to workers would be maintained as low as reasonably achievable, that the calibration sources would be properly handled in accordance with licensee procedures, and, as such, USEC's RPP, with respect to the possession and use of source and byproduct material calibrations sources, complies with the regulations in 10 CFR 20.1101, 20.1201, 20.1801, 20.1802, 20.1902(a), 20.1904, 20.2102, 30.33(a)(3), and 40.32(b).

With regards to the licensee's Decommissioning Financial Assurance, the NRC staff concluded that the quantities and types of calibration sources proposed are below the threshold limits for requiring decommissioning financial assurance stated in 10 CFR 30.35(a)(2), 10 CFR Part 30, Appendix B, and 10 CFR 40.36. In addition, the NRC staff concluded that, although the receipt of the described source and byproduct material

calibration sources would require USEC to update its DFP, cost estimates, and depleted uranium disposition estimates on an annual, forward-looking basis, at this time these are not necessary since, by themselves, the source and byproduct material calibration sources do not require financial assurance. The NRC staff also concluded that LCs 16 and 17 would need to be revised to clarify the financial assurance requirements. In addition, the staff concluded that the licensee's decommissioning financial assurance is adequate and complies with the regulations in 10 CFR 30.35(a)(2).

With regards to the licensee's MC&A, the NRC staff concluded that the proposed changes would not decrease the overall effectiveness of USEC's MC&A program; and that the licensee's program would continue to provide adequate assurance of full control of all source material under its possession. The staff also concluded that the proposed changes would not adversely impact the FNMCPs for the Lead Cascade or the ACP, and that the proposed changes are consistent with the regulations in 10 CFR 74.33(a)(1).

With regard to the environmental impacts of the proposed changes, the NRC staff concluded that the proposed changes are administrative, organizational, or procedural in nature, and that the changes will not result in a significant increase in individual or cumulative occupational radiation exposure, and will not have a significant impact on the human environment. Therefore, the proposed changes meet the requirements for a categorical exclusion under 10 CFR 51.22(c)(11).

The NRC staff concludes that the licensee has demonstrated that its equipment and facilities are adequate to protect health and minimize danger to life and property and that it is qualified, by training and experience, to use the proposed materials in a manner that will protect health and minimize danger to life or property. In addition, the licensee has demonstrated that it would continue to provide adequate assurance of full control of all source and byproduct material under its possession. Based on its review and evaluation of the information provided by USEC, and the results of the limited scope Operations Readiness Review, the NRC staff finds that the proposed changes are acceptable and should be approved.

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