Pre-application Meeting to discuss the Licensing Process for a Proposed Fissile Material Storage Facility and Cylinder Wash And Recertification Facility

Agenda

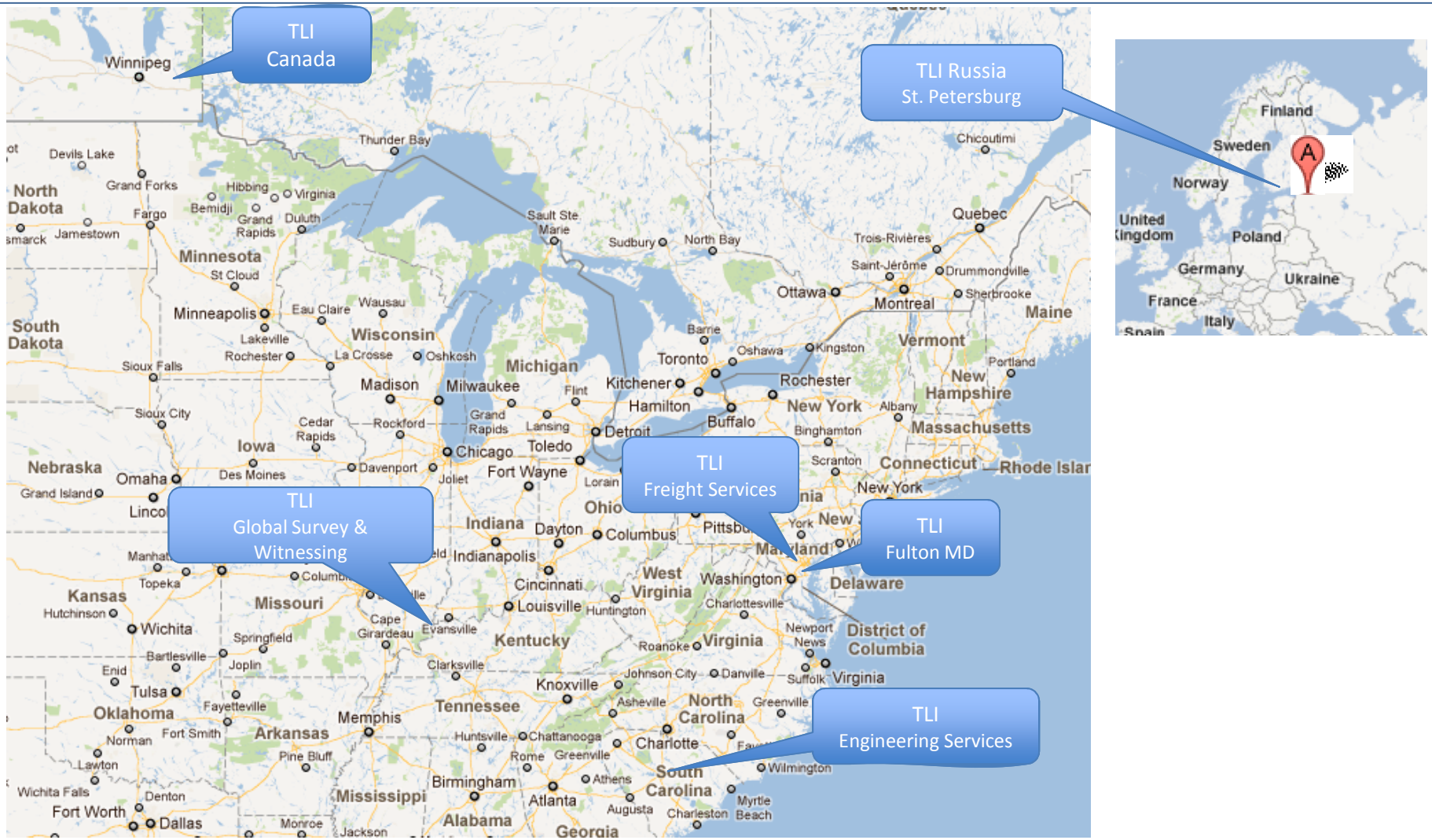
1. Introduction to Transport Logistics International
2. Proposed plan for LEU storage facility
3. Proposed plan for cylinder wash and re-certification facility
4. Part 70 licensing

1. Transport Logistics International

Transport Logistics International, Inc. (TLI) is dedicated to offering superior management services for domestic and international movements of radioactive cargoes. TLI offers integrated service to the front and back end sectors of the nuclear fuel cycle, ensuring safe, secure and economic transport.

TLI's comprehensive portfolio of expertise provides for strict adherence to international and domestic regulations, packaging requirements and import/export controls. In addition, the company offers DOT-Compliant HAZMAT Training, consulting services associated with transportation feasibility studies, export licensing activities, package validations and antidumping order compliance.

1. www.tliusa.com



2. Proposed Plan for LEU Storage Facility

What

- LEU material, (UF_6, UO_2, U_3O_8)
- Powder, pellets, finished PWR fuel assemblies and BWR bundles.
- UF_6 would be stored in ANSI N14.1 certified cylinders.
- LEU powder, pellets, and finished fuel would be stored in NRC licensed transport packages.
- The transport packages would not be opened
- No work would be done to- or with the RAM.
- <u>Storage facility only</u>

2. Proposed Plan for LEU Storage Facility

Where

- Estimate needing 3-5 acres for entire site
- Location not decided
- USEC / DOE property mentioned as a possibility
- Perhaps shorten the licensing process.
  - USEC is a Part 76 Licensee.
  - Would establishing the facility on DOE land also shorten the licensing process?

2. Proposed Plan for LEU Storage Facility

Why

- TLI believes that there is a need for short- and long term storage for utilities and fuel fabricators.

- Not to be storage incident to transportation (49CFR173.447)

2. Proposed Plan for LEU Storage Facility

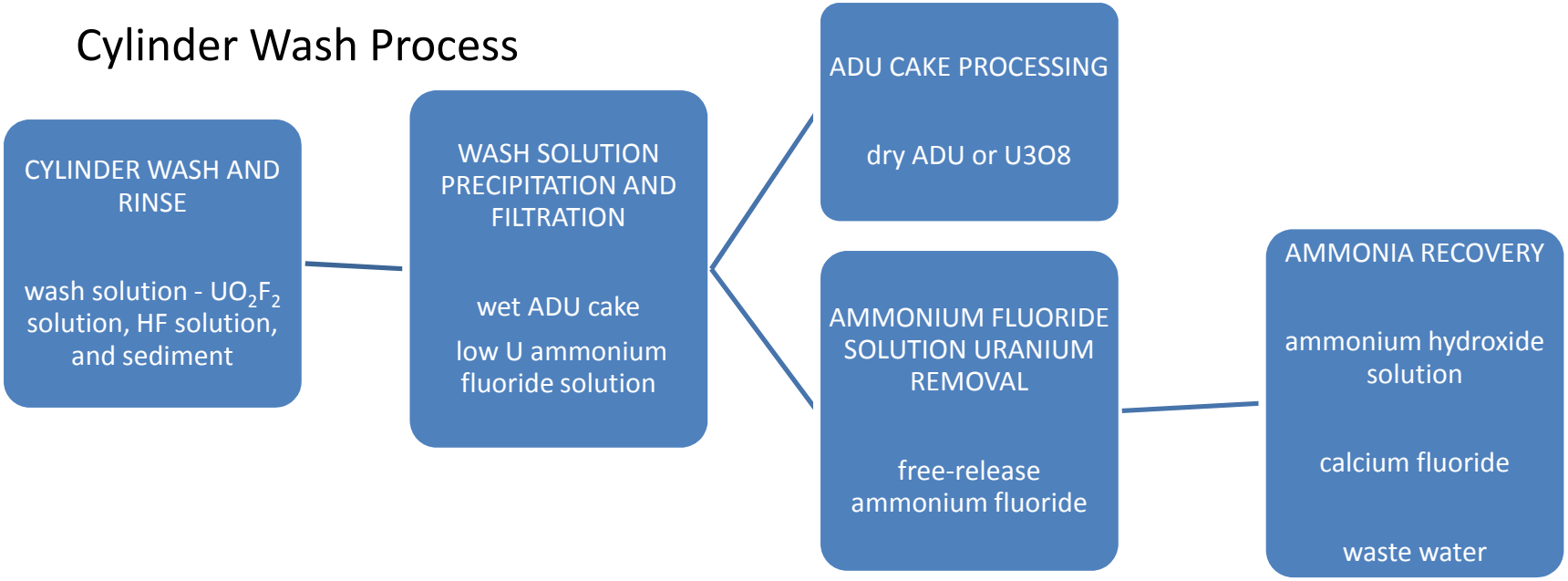
When

- Submit license application within 12 months.
- Complete the licensing process within 12-18 months after submitting application.
- Begin operating the facility immediately upon receiving license.

3. Proposed Plan for Cylinder Wash and Recertification Facility

What

Cylinder Wash Process



3. Proposed Plan for Cylinder Wash and Recertification Facility

What

Cylinder Recertification Process

3. Proposed Plan for Cylinder Wash and Recertification Facility

Why

- Large number of cylinders that need washing and recertification.
- No single facility dedicated to cylinder wash and recertification

3. Proposed Plan for Cylinder Wash and Recertification Facility

When

- Coordinate with NRC to determine best time to submit (while the storage facility application is in review).
- Install wash and rinse facilities at risk during license review process.
- Complete licensing process and have the facility in operation within 12 months of submittal of application.

4. Part 70 Licensing

New Licenses

A company that wishes to operate a fuel cycle material facility must submit an application to the NRC. This application must demonstrate how the facility will be operated to ensure adequate safety and safeguards in accordance with NRC licensing regulations found in 10 CFR Parts 30, 40, 70, 73, 74, and 76.

PART 30—RULES OF GENERAL APPLICABILITY TO DOMESTIC LICENSING OF BYPRODUCT MATERIAL

PART 40--DOMESTIC LICENSING OF SOURCE MATERIAL

PART 70—DOMESTIC LICENSING OF SPECIAL NUCLEAR MATERIAL

PART 73—PHYSICAL PROTECTION OF PLANTS AND MATERIALS

PART 74--MATERIAL CONTROL AND ACCOUNTING OF SPECIAL NUCLEAR MATERIAL

PART 76—CERTIFICATION OF GASEOUS DIFFUSION PLANTS

4. Part 70 Licensing

§ 70.64 Requirements for new facilities or new processes at existing facilities.

(1) Quality standards and records.
(2) Natural phenomena hazards
(3) Fire protection
(4) Environmental and dynamic effects
(5) Chemical protection
(6) Emergency capability
(7) Utility services.
(8) Inspection, testing, and maintenance.
(9) Criticality control
(10) Instrumentation and controls.
(b) Facility and system design and facility layout must be based on defense-in-depth practices.1 The design must incorporate, to the extent practicable:
(1) Preference for the selection of engineered controls over administrative controls to increase overall system reliability; and
(2) Features that enhance safety by reducing challenges to items relied on for safety.

4. Part 70 Licensing

License Application Organization (from NUREG 1520)

- CH 1: General Information
- CH 2: Organization and Administration
- CH 3: Integrated Safety Analysis (ISA)
- CH 4: Radiation Protection
- CH 5: Nuclear Criticality Safety
- CH 6: Chemical Process Safety
- CH 7: Fire Safety
- CH 8: Emergency Management
- CH 9: Environmental Protection
- CH 10: Decommissioning
- CH 11: Management Measures