



Global Nuclear Fuel

A Joint Venture of GE, Toshiba, & Hitachi

Global Nuclear Fuel

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SPM 11-066

November 29, 2011

U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001
Attn: Document Control Desk

ATTN: Mr. M. N (Nick) Baker, NMSS

Subject: GNF-A Request to Reschedule ISA Action Plan Milestones

References:

- 1) NRC License SNM-1097, Docket 70-1113
- 2) GNF-A ISA Action Plan, S. P. Murray to E. Cobey, 1/11/10
- 3) NRC Inspection Report and Notice of Violation, EA 09-268, 70-1113/2010-003, 6/9/10
- 4) GNF-A Reply to Notice of Violation, EA 09-268, 7/23/10
- 5) 30 Day Report – Completion of Conversion Milestone, S. P. Murray to NRC Document Control Desk, 4/29/11
- 6) GNF-A/NRC Public Meeting on ISA Action Plan Status, 11/3/11

Dear Mr. Baker:

GNF-A has made significant progress on addressing GNF-A Integrated Safety Analysis (ISA) programmatic deficiencies identified in the Notice of Violation (Reference 3). The analytical work for the second ISA scheduled milestone for the fabrication area of our facility is complete with all of the Quantitative Risk Analyses (QRA) developed and an implementation plan is in progress. As we discussed with NRC staff at our November 3, 2011 ISA action plan status meeting (Reference 6), added project scope will take an additional period of time to complete the ISA project.

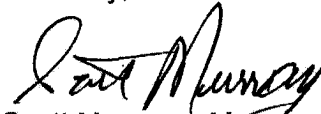
As the ISA project has progressed, a need has been identified to conduct detailed reviews of the original supporting analyses, base assumptions and plant configuration, including a verification of items relied on for safety (IROFS) maintenance test records, management measures, and operator instructions. If discrepancies are identified during these reviews, they are evaluated, entered into a corrective action program, and reported to NRC as necessary.

The ISA action plan project has also been enhanced to include a better description of IROFS boundary definitions and other lessons learned from the project to date.

We are continuing the dedicated efforts to finish the ISA review project as quickly as possible but no later than March 2013 as shown in the attached schedule.

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

Sincerely,

A handwritten signature in black ink, appearing to read "Scott Manager".

Scott Manager, Manager
Licensing & Liabilities
Global Nuclear Fuel — Americas, L.L.C

Attachment – Revised ISA Action Plan Schedule

cc: R. Johnson, USNRC NMSS
M. Widmann, USNRC RII Atlanta
M. Sykes, USNRC RII Atlanta
M. Thomas, USNRC RII Atlanta

Attachment

Revised ISA Action Plan Schedule

Conversion ISA Review Implementation	Complete	
Fabrication ISA Review Implementation	Complete	
	January	2012
*Conversion ISA Record Reviews and Verifications	March	2012
*Fabrication ISA Record Reviews and Verifications	September	2012
Balance of Plant ISA Reviews & Verifications Implementation	December March	2012 2013
Complete ISA & ISA Summary Revisions	March	2013

*Added scope from original action plan