

SAFETY EVALUATION REPORT

REQUEST TO RESCHEDULE INTEGRATED SAFETY ANALYSIS ACTION PLAN MILESTONES

LICENSEE: GLOBAL NUCLEAR FUEL – AMERICAS
LICENSE NUMBER: SNM-1097
DOCKET NUMBER: 70-1113

Background:

In a letter dated July 23, 2011, Global Nuclear Fuel - Americas (GNF-A) replied to Notice of Violation EA-09-268 with a number of corrective actions, including a plan to review facility processes to ensure a consistent application of the Integrated Safety Analysis (ISA) methodology.

On January 14, 2011, the U.S. Nuclear Regulatory Commission (NRC) issued Amendment 1 to license Special Nuclear Material-1097, approving a revised ISA methodology. The amendment also included a new License Condition S-4, which clarifies that GNF-A may conduct licensed activities and maintain records in accordance with the original approved ISA methodology (Revision 1) contained in the renewal License Application, Chapter 3, as well as commitments to criticality event reporting requested under EA-09-268, and until completion of the ISA Project.

The corrective actions and supplemental information described by GNF-A in the July 23, 2010, response (Agencywide Documents Access and Management Systems [ADAMS] ML102040281) to the violations in EA-09-268 (ADAMS Accession Number ML101610024) were found to be acceptable by Region II as stated in a letter dated August 20, 2010 (ADAMS Accession Number ML102350073).

Thus, GNF-A would be in compliance with the performance requirements throughout the transition from old to new methodology—although if a condition was identified in which criticality controls required to meet double contingency were not maintained or available, the NRC would be notified within 24 hours. If necessary, actions would be taken to maintain safety. Such actions may include shutting down equipment. New types of scenarios, which were not evaluated and which do not meet the performance requirements, are subject to 24-hour reporting when the Quantitative Risk Analysis determines that the performance requirements were not met.

The July 23, 2010, letter also included a recommendation to apprise the NRC on the status of the review at periodic meetings and site visits, as well as the ISA Action Plan milestones. These meetings occurred on July 1, 2010 (NRC Headquarters Offices), November 2, 2010 (Region II Offices), April 27, 2011 (GNF-A site), September 30, 2011 (Region II Offices), and November 3, 2011 (NRC Headquarters offices).

At the September 30, 2011, public meeting, the NRC asked if lessons learned from the Fukushima, Japan and Mineral, Virginia earthquakes (March 11, 2011, and August 23, 2011, respectively) were being incorporated.

At the same meeting, the NRC asked which part of the validation of management measures required validation of assumptions, design criteria, and functional tests. The NRC suggested that the project may be a good opportunity to perform a review, while the ISA team is formed—of design assumptions—and requested additional dialog on the topic if the additional burden were to affect the end date for completion of the ISA project. This dialog was a take-away from the meeting, and resulted in the current request to reschedule the affected milestones.

Evaluation

The current submittal describes the request for information which is not related to the violation and is outside the scope of the original plan: detailed reviews of original supporting analyses, base assumptions and plant configuration; a verification of maintenance test records for items relied on for safety (IROFS); management measures; operator instructions; descriptions of IROFS boundary definitions; and lessons learned.

Recommendation

The NRC staff recommends approval of the request and a change to License Condition S-4: keeping the reference to the July 23, 2010, reply for a link back to the original violation, and adding a reference to the current November 29, 2011, request—which specifies the new scope, schedule, and interim milestones.

Contributors

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