



December 13, 2011
GDP 11-043

Mr. Anthony T. Gody, Jr.
U.S. Nuclear Regulatory Commission
Region II
Marquis One Tower
245 Peachtree Center Avenue, NE
Atlanta, GA 30303-1257

**Paducah Gaseous Diffusion Plant (PGDP)
Docket No. 70-7001, Certificate No. GDP-1
Request to Review the PGDP Resident Inspector Program**

Dear Mr. Gody:

USEC's Paducah facility has operated under NRC regulatory oversight since March of 1997. Since that time the NRC has maintained two full time resident inspectors at the facility in addition to performing the NRC-HQ and NRC Region II core inspection program annually. Plant regulatory and safety performance during this period has continued to improve to the point that NRC's last two Licensee Performance Reviews have indicated no areas for improvement. USEC believes this performance record can be attributed to the combined efforts of USEC and NRC toward safe plant operation.

Of the fourteen operating fuel cycle facilities in the US, only three facilities have resident inspectors - the two operating Category 1 fuel fabrication facilities, and the Category 3 enrichment facility at Paducah. Given the significant differences in relative risk profiles between the Category 1 facilities and the Category 3 facility at Paducah, the need for two full time resident inspectors at PGDP does not appear justifiable. In addition, recent conversations with NRC-HQ and NRC Region II management personnel indicate an NRC goal to place inspectors in the field based on the relative risk and performance of the facilities. USEC agrees and supports that goal.

Based on continued regulatory and safety performance, the relative low risk, and the need to optimize resources at USEC and NRC, USEC respectfully requests that the NRC evaluate the resident inspector program for potential reduction to one resident inspector at PGDP.

Sincerely,

James D. Lewis, General Manager
Paducah Gaseous Diffusion Plant

JDL:VJS:mcl

cc: J. Kinneman, NRC-HQ

United States Enrichment Corporation
Paducah Gaseous Diffusion Plant
P.O. Box 1410, Paducah, KY 42002

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