

December 16, 2011
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Victor McCree
Regional Administrator
USNRC Region II
245 Peachtree Center Avenue, Suite 1200
Atlanta, GA 30303-1257



Gentlemen:

**Subject: Proposed Revision of Scope for Safety Culture Assessment
Required By Confirmatory Order EA-10-041, Docket No. 70-1257,
License No. SNM-1227**

AREVA requests consideration regarding a clarification/revision in scope of the requirement for performing an independent safety culture assessment called out in Section III paragraph 3.c of the subject NRC Order. Since the time of issuance of the Confirmatory Order AREVA has discontinued SNM operations at its Mount Athos Road Facility, License No. SNM-1168. AREVA has been working with the NRC to declassify this SNM license and has no (<350 grams U235) SNM or fuel operations at this site. AREVA has also decided to transfer its SNM conversion operations performed at its Erwin location (operated under the NFS SNM License, SNM-124) to its Richland, WA fuel facility. The currently stored inventory of uranyl nitrate will be transferred to Richland; the conversion facility is shutdown and will not be restarted. AREVA has very few employees located at either of these facilities.

AREVA requests that while the Order currently states - "The assessment will include AREVA's Richland, Washington facility, its Erwin, Tennessee facility, and its Lynchburg, Virginia facility," the NRC modify the order/clarify the scope to include the Richland facility and the Engineering activities located at the Old Forrest Road, Lynchburg, VA offices.

Your timely consideration of this request will allow us to produce a focused assessment meeting the original intent of the Order. If you have questions, please feel free to contact me at 509-375-8409.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Robert Link', with a stylized flourish at the end.

R. E. Link, Manager
Environmental, Health, Safety, & Licensing

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