



NUCLEAR FUEL SERVICES, INC.
a subsidiary of The Babcock & Wilcox Company

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21G-12-0002
GOV-01-55-04
ACF-12-0002

January 10, 2012

Director, Office of Nuclear Material Safety and Safeguards
U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555

Reference: Docket No. 70-143; SNM-124

**Subject: Submittal of Internally
Authorized Changes (IACs) for
Calendar Year 2011**

| | |
|---|-----------------------------------|
| OFFICIAL USE ONLY | |
| May be exempt from public release under the Freedom of Information Act (5 U.S.C. 552) | |
| Exemption number | <u>2</u> |
| Nuclear Regulatory Commission review required before public release. | |
| Name and organization of person making determination | <u>R. Shackelford</u> / NFS, Inc. |
| Date of Determination | <u>1/10/2012</u> |

In accordance with 10 CFR 70.72(d)(2), Nuclear Fuel Services, Inc. (NFS) hereby submits a summary of the Internally Authorized Changes (IACs) that were implemented at NFS during Calendar Year 2011.

The *Summary of IACs Implemented During Calendar Year 2011* (Attachment 1) includes for each IAC: IAC number, IAC Title and Reason for IAC, and the Date the IAC was Released for Operation. The "Reason for IAC" includes a brief description of why the change was made.

In accordance with License Condition S-25 of SNM-124, each IAC was reviewed by NFS' safety disciplines, and the questions from 10 CFR 70.72(c)(1 - 4) were answered using the documentation shown in Attachment 2. If the answer is "Yes" to any of the questions, then NRC approval is required. Each IAC is also approved by the Safety and Safeguards Review Council (SSRC). All IACs included in Attachment 1 did not require pre-approval under 10 CFR 70.72 because responses to each question from 10 CFR 70.72(c)(1 - 4) were "No."

Information provided in Attachment 1 includes sensitive information and is marked as "Official Use Only" in accordance with 5 U.S.C. 552, and is not suitable for public release.

The Integrated Safety Analysis (ISA) Summaries that reflect changes to existing NFS operations and those at the BLEU Complex were revised and are being submitted under separate cover letter in accordance with 10 CFR 70.72(d)(3). To assist in your review of the revised ISA Summaries, Attachment 1 groups the IACs by the ISA Summary that relates to each process change.

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If you or your staff have any questions, require additional information, or wish to discuss this further, please contact me, or Ms. Jennifer Wheeler, Licensing and ISA Manager, at (423) 735-5429. Please reference our unique document identification number (21G-12-0002) in any correspondence concerning this letter.

Sincerely,

NUCLEAR FUEL SERVICES, INC.



Mark P. Elliott, Director
Quality, Safety, and Safeguards

JKW/pdj

Attachment 1: Summary of Internally Authorized Changes (IACs) Implemented During Calendar Year 2011

Attachment 2: License Amendment Evaluation from NFS-HS-A-67

Copy:

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ATTACHMENT 2

License Amendment Evaluation from NFS-HS-A-67

1 page to follow

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~~NFS-HS-A-67, Revision 9~~

June 20, 2011

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Attachment A

SAFETY AND REGULATORY REVIEW ROUTING FORM
 (Front Side)

NFS-HS-A-67-A, Rev. 1
 Authorization of Form (initials): *RD*

Revision Date: 04/08/2011

LIC-11

SAFETY & REGULATORY REVIEW ROUTING FORM

| | |
|--------------------|-----------------------------|
| Date In: / / | Date Out With Comments: / / |
| Date Approved: / / | Date Returned: / / |

Circle Review Type → Procedure - LOA - CCP (Circle one: Major / Minor) - FWP - SR - GH-44 Att. A - Other

Number: Section: Revision:

Title/Subject:

Originator: Phone No.: ECR#:

SSRC Comments from Biennial Reviews of Procedures: Attached / None / NA Commitment Log: Yes / NA

| Safety Discipline Review Questions (Place comments, if needed, on the back of this form) | Ind. Safety | Rad. Safety | Env. Safety | Crit.* Safety | Safety* Analysis | Other |
|---|-------------|-------------|-------------|---------------|------------------|-------|
|---|-------------|-------------|-------------|---------------|------------------|-------|

A. Is the attached document related to an existing Internally Authorized Change (IAC)?
 If yes, enter IAC Number _____, then skip to Section B. If no, is an IAC required? (Be prepared to justify your answer)

| | | | | | | |
|---|-----|-----|-----|-----|-----|-----|
| 1. The change may significantly affect radiological or criticality safety. | | Y/N | | Y/N | | |
| 2. The change may significantly affect environmental or industrial safety. | Y/N | | Y/N | | | |
| 3. The change results in non-compliance with an existing license condition. | Y/N | Y/N | Y/N | Y/N | Y/N | Y/N |
| 4. The change results in facilities, equipment, procedures, or safety controls substantially different from those currently in use. | Y/N | Y/N | Y/N | Y/N | Y/N | Y/N |
| 5. The change requires revision of the applicable safety or environmental basis. | Y/N | Y/N | Y/N | Y/N | Y/N | Y/N |
| 6. The change results in a violation of currently established criticality, industrial, radiological, or environmental safety principles, or established methods of maintaining radiation exposures ALARA. | Y/N | Y/N | Y/N | Y/N | | Y/N |
| 7. The change involves decommissioning-related activities. | Y/N | Y/N | Y/N | Y/N | | Y/N |

B. Is a license amendment required? (Be prepared to justify your answer)

| | | | | | | |
|---|-----|-----|-----|-----|-----|-----|
| 1. The change requires a modification to a license condition or to Part I of SNM-124. | Y/N | Y/N | Y/N | Y/N | Y/N | Y/N |
| 2. The change results in the creation of a new type of accident sequence that, unless mitigated or prevented, would result in high or intermediate consequences (exceed the performance requirements of 10 CFR 70.61) and has not previously been described in the ISA summary. | | | | Y/N | Y/N | |
| 3. The change results in the usage of new processes, technologies, or controls for which NFS has no prior experience. | Y/N | Y/N | Y/N | Y/N | Y/N | |
| 4. The change results in the removal, without at least an equivalent replacement of the safety function, of an item relied on for safety that is listed in the ISA summary and is necessary for compliance with the performance requirements of 10 CFR 70.61. | | | | Y/N | Y/N | |
| 5. The change results in the alteration of any item relied on for safety, listed in the ISA summary, that is the sole item preventing or mitigating an accident sequence that exceeds the performance requirements in 10 CFR 70.61. | | | | Y/N | Y/N | |
| 6. The change requires an NRC-approved Decommissioning Plan. | | | Y/N | | | |

C. Is a safety basis document available? (Examples include ACE, FHA, ISA, PHA, NCSE, Env. Rpt., Emergency Plan, FNMC Plan, etc.)

| | | | | | | |
|--|--------|--------|--------|--------|--------|--------|
| 1. If yes, has a revision already been completed that addresses this change? | Y/N/NA | Y/N/NA | Y/N/NA | Y/N/NA | Y/N/NA | Y/N/NA |
| 2. If no to #1 of this section, is a revision needed prior to implementing the change? | Y/N/NA | Y/N/NA | Y/N/NA | Y/N/NA | Y/N/NA | Y/N/NA |
| 3. If no safety basis document is available, is one needed? | Y/N/NA | Y/N/NA | Y/N/NA | Y/N/NA | Y/N/NA | Y/N/NA |
| 4. The change may affect criticality detector system coverage or audibility of criticality alarms. | | Y/N/NA | | Y/N/NA | | Y/N/NA |

D. Is a current IROFS/SRE list available? (circle one: Yes / No)

| | | | | | | |
|----------------------------------|--|--|--|--------|--------|--|
| 1. If yes, is a revision needed? | | | | Y/N/NA | Y/N/NA | |
| 2. If no, is a new list needed? | | | | Y/N/NA | Y/N/NA | |

| | | | | | | |
|--|---------------|--|--|--|--|--|
| *Must review all changes involving SNM equipment/processes | Initials ⇒ | | | | | |
| | Concurrence ⇒ | | | | | |

Other - (i.e., EP, NDA, MC&A, etc.)

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