



## Global Nuclear Fuel

A Joint Venture of GE, Toshiba, & Hitachi

## Global Nuclear Fuel

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### Security-Related Information Notice

*This letter forwards security-related sensitive information which is to be withheld from public disclosure in accordance with 10CFR2.390 and NRC RIS 2005-31. The balance of this letter may be considered non-sensitive upon the removal of all of Attachment 1*

SPM 12-005

February 2, 2012

ATTN: Document Control Desk  
Director, Office of Nuclear Material Safety & Safeguards  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555-0001

Subject: GNF-A ISA Fabrication Implementation and IROFS List

References: (1) License SNM-1097, Docket 70-1113  
(2) Letter, S.P. Murray to R. P. Zimmerman, 7/23/10, Reply to NOV  
(3) Letter, S.P. Murray to M. N. Baker, 7/28/11, GNF-A ISA Request to Reschedule Fabrication Milestone  
(4) Letter, S. P. Murray to NRC Document Control Desk, 9/30/11, 30 Day Report of Event – Completion of ISA Action Plan Fabrication Milestone  
(5) Letter, S.P. Murray to M. N. Baker, 11/20/11, Revised Schedule to Complete ISA Action Plan

Global Nuclear Fuel – Americas, LLC (GNF-A) in Wilmington, NC committed to an action plan which included a comprehensive review of the Integrated Safety Analysis (ISA) to address specific issues associated with the ISA (Reference 2). The milestones for completion of the ISA review and subsequent implementation of the revised safety basis were modified from the original ISA action plan as described in References 3 and 5.

The revised ISA for the Fabrication area has been completed and implemented per the revised ISA action plan schedule.

The revised ISA action plan contains a commitment to provide the NRC Staff with a listing of all safety controls re-designated as items relied on for safety (IROFS) at the completion of each ISA implementation milestone. Attached is a list of all IROFS associated with the Fabrication area (Attachment 1). The list of IROFS identifies both existing IROFS that are still credited in the ISA as well as those existing safety controls that have been re-designated as IROFS. Management measures have been applied to all IROFS in accordance with GNF-A ISA procedures.

Per discussion with the NRC Staff, an interim ISA Summary document describing the revised safety basis will be submitted for the Staff's review in the coming months. The interim ISA Summary document will describe the results of the ISA for the Fabrication area utilizing the new ISA methodology.

Pursuant to NRC Regulatory Issue Summary 2005-31, GNF-A requests that Attachment 1 to this letter be withheld from public disclosure under 10 CFR 2.390 as it contains security-related sensitive information associated with our safety analyses & risk assessments.

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

Sincerely,

 Phillip D. Ollis for

S. P. Murray, Manager  
Licensing and Liabilities

Commitments: Submit updated ISA Summary document

Attachment: 1) List of IROFS for the Fabrication Area (*security-related information*)

cc: M. Sykes, NRC Region II, Atlanta  
M. L. Thomas, NRC Region II, Atlanta, GA  
M. N. (Nick) Baker, NRC NMSS, Washington, D.C.