

Request for Additional Information
Revision 4 of Licensing Basis Documents
AREVA Enrichment Services - Eagle Rock Enrichment Facility
Submittal Dated February 9, 2012
Docket No. 70-7015

Description of Information Needed and Discussion

Page 7-7 of the Safety Evaluation Report for the Eagle Rock Enrichment Facility (NUREG-1951) states, "The assumed inventory for a fire involving a cylinder transporter/mover is the amount of UF6 in a UF6 cylinder (48Y or 30B) in transit. Only electric drive cylinder transporters with preventative measures engineered to prevent a rupture of a cylinder will be used for cylinder transport at the proposed facility (IROFS67). When filled 30B cylinders are transported outside of the buildings, they are protected by DOT approved overpacks (IROFS44)."

AREVA Enrichment Service (AES) has proposed a design change to add "the use of forklift(s) with gripper arms and tractors pulling trailers to and from the storage pads when normal cranes, carriages, or transporters are not available." In the summary of the proposed change, AES stated that "Fire Accident Sequences FF99-1, FF23-1A, and FF-34-1B and IROFS67 were altered...to reflect the cylinder handling forklift operation." Will the new cylinder transporters/movers be battery powered? If the design is not yet finalized, will AES submit a license amendment to clarify items relied on for safety (IROFS) 67 once a final design is agreed upon?

Regulatory Basis

The regulation in Title 10 of the *Code of Federal Regulations* (10 CFR) 70.62(c)(1)(iii) requires that the Integrated Safety Analysis identify facility hazards that could affect the safety of licensed materials and thus present an increased radiological risk. Modification of a sole IROFS, like IROFS 67, requires prior U.S. Nuclear Regulatory Commission's (NRC's) approval by 10 CFR 70.72(c)(3). Additionally, 10 CFR 70.72(c)(1)(i) requires prior NRC approval of changes that create a new accident sequence which, if unmitigated or prevented, exceeds the performance requirements of 10 CFR 70.61.

Furthermore, License Condition 13 states:

- a) The licensee shall not make changes to the license application that decreases the effectiveness of safety commitments in the license application without prior NRC approval. For these changes, the licensee shall submit to the NRC, for review and approval, an application to amend the license. Such changes shall not be implemented until approval is granted.

Enclosure