USEC
A Global Energy Company

June 29, 2012
GDP 12-0022

Attention: Document Control Desk
Ms. Catherine Haney
Director, Office of Nuclear Material Safety and Safeguards
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Paducah Gaseous Diffusion Plant (PGDP)
Docket No. 71-0832
Revision to the Radioactive Material Packaging and Transportation Quality Assurance Program (PTQAP)

Dear Ms. Haney:

The United States Enrichment Corporation (USEC) hereby submits proposed changes to UEO-1041, "Radioactive Material Packaging and Transportation Quality Assurance Program (PTQAP)" for NRC review and approval. This program is referred to in the NRC Quality Assurance Program Approval for Radioactive Material Packages No. 0832.

Enclosure 1 provides a description of the proposed changes and the bases for the changes. These changes recognize the realignment of the procedures, document control, and records management groups from the Production Support Organization to the Regulatory Affairs Organization. Enclosure 2 contains the proposed revision to the PTQAP. These changes are necessary since the Certificate of Compliance for PGDP (GDP-1) has been changed to reflect these organizational realignments.

USEC requests NRC review of this submittal as soon as practical. Upon receipt of the NRC approval of the enclosed change, the PTQAP will be revised and issued to the NRC using the next sequential revision number.

Should you have any questions related to this submittal, please contact me at (301) 564-3250.

Sincerely,

S. A. Toelle

Steven A. Toelle
Director, Regulatory Affairs

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NMSS01

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Enclosures:

1. Proposed Changes to Radioactive Material Packaging and Transportation Quality Assurance Program, USEC Document UEO-1041, Description of Changes and Bases

2. Proposed Revision Pages, Radioactive Material Packaging and Transportation Quality Assurance Program, USEC Document UEO-1041

cc: J. Calle, NRC Region II Office
T. Liu, NRC Project Manager - HQ
NRC Sr. Resident Inspector - PGDP

Enclosure 1

GDP 12-0022

Radioactive Material Packaging and Transportation Quality Assurance Program,
USEC Document UEO-1041

Description of Changes and Bases

United States Enrichment Corporation (USEC)

Proposed Changes to
Radioactive Material Packaging and Transportation Quality Assurance Program,
USEC Document UEO-1041

Description of Changes and Bases

Changes to UEO-1041, "Radioactive Material Packaging and Transportation Quality Assurance Program" are proposed herein:

- Section 2.5.2, Responsibilities, second paragraph: replaces Production Support Manager with Regulatory Affairs Manager as the manager responsible for system of preparation, review, approval, and use of procedures and instruction.
- Section 2.6.2, Responsibilities, first paragraph: replaces Production Support Manager with Regulatory Affairs Manager as the manager who has the overall responsibility for the development and implementation of the document control system."
- Section 2.17.2, Responsibilities, first paragraph: replaces Production Support Manager with Regulatory Affairs Manager as the manager who is responsible for the development, maintenance, and implementation of the records management system."

Bases: The proposed changes reflect a realignment of managerial oversight responsibilities. The work groups that perform the functions, and the functions themselves, are unchanged.

Enclosure 2
GDP 12-0022
6 Pages Total

Proposed Revision
Radioactive Material Packaging and Transportation Quality Assurance Program
USEC Document UEO-1041

Removal/Insertion Instructions

Remove Pages	Insert Pages
iii, xi, 8, 9, 20	iii, xi, 8, 9, 20

LIST OF EFFECTIVE PAGES

Pages	Revision
iii	RAC 12C013
iv	4
v	4
vi	4
vii	4
viii	4
ix	10
x	15
xi	RAC 12C013
xii	16
1	19
2	19
3	19
4	15
5	19
6	18
7	18
8	RAC 12C013
9	RAC 12C013
10	12
11	18
11a	11
11b	11
12	18
13	18
14	18
15	18
16	18
17	18
18	12
19	18
20	RAC 12C013
21	4
22	12
23	11
24	4
25	4
26	4

Revision Summary Page

Revision	Revision Summary
5	Revised Section 2.5.2, second paragraph and added a new third paragraph to address the organization change that resulted from combining the Training and Procedures Section with the Production Support Section at PGDP.
6	Revised the Introduction, first paragraph, changing "10CFR 71.12 (c) (2)" to "10 CFR 71.17 (c) (2)." Revised sections 2.6.2 and, first paragraph to address the organization change that resulted from deleting the Plant Services Organization and transferring the document control and records management system to the Production Support Organization at PGDP.
7	Revised Sections 2.2.2, 2.3.2, 2.3.3, 2.4.2, 2.5.2, 2.7.2, 2.8.2, 2.9.2, 2.10.2, 2.10.3, 2.11.2, 2.12.2, 2.12.3, 2.13.2, 2.15.2, and 2.16.2 to minimize the PTQAP dependence on specific organizational titles where possible and to focus on the related quality assurance requirement(s) and where functionally they are to be performed within the organization. Revised Sections 2.6.2 and 2.17.2 to replace "Plant Services" with "Records Management and Document Control" to reflect the specific entity at PORTS responsible for records management and document control.
8	Revised Sections 1, 2.1.1, 2.1.2, 2.2.5, 2.5.2, 2.6.2, and 2.17.2 to delete references to Portsmouth/responsibilities and or adapted sentence structure to a singular subject format i.e., Paducah Gaseous Diffusion Plant (GDP) only.
RAC 12C013	Revised Sections 2.5.2, 2.6.2, and 2.17.2 to reflect deletion of the Production Support Organization and the reassignment of its former procedures, document control, and records management functions to the Regulatory Affairs Organization.

2.5 INSTRUCTIONS, PROCEDURES, AND DRAWINGS

2.5.1 General

The system established for instructions, procedures, and drawings applies to radioactive material packaging and transportation SSC items, as described below. Measures are in place to ensure that activities affecting quality are prescribed by documented procedures, drawings, and instruction, as appropriate, and are accomplished in accordance with these documents.

2.5.2 Responsibilities

The Nuclear Safety and Quality Manager is responsible for review of selected procedures for inclusion of quality requirements.

The Regulatory Affairs Manager is responsible for the system of preparation, review, approval, and use of procedures and instructions in accordance with the requirements of this PTQAP.

The manager responsible for the engineering function is responsible for the system of preparation, reviews, and approval of drawings for SSCs within the scope of the PTQAP.

Organization managers are responsible for developing and approving procedures which control functions or activities within their area of responsibility, as defined in the PTQAP.

All personnel are required to use and adhere to the requirements of applicable procedures, instruction, and drawings for activities within the scope of the PTQAP.

2.5.3 Requirements

Instructions, procedures, drawings and other documents pertinent to radioactive material packaging and transportation SSCs provide measures to ensure activities affecting quality are prescribed, including appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished.

Procedures ensure the following:

1. The requirements for meeting 10 CFR 71.87 are established.
2. Packaging maintenance and repair are prescribed with inspection and hold points incorporated as necessary.
3. Controls for packaging loading and unloading are specified.

4. Prior to shipment, packages are reviewed to ensure Department of Transportation (DOT) compliance.

Activities that require skills normally possessed by qualified personnel (known as skill-of-the-craft) may not require detailed step-by-step delineation in a procedure, but are subject to general administrative procedural controls.

Temporary procedures may be issued when permanent procedures do not exist:

1. to direct operations during testing, maintenance, and modification.

2. to provide guidance in unusual situations not within the scope of permanent procedures.

3. to ensure orderly and uniform operations for short periods when the plant, a system, or component of the system is performing in a manner not covered by existing permanent procedures or has been modified or extended in such a manner that portions of existing procedures do not apply.

Temporary procedures may be used for a period of time which should not exceed 60 days, or a period for which the temporary condition must exist, whichever is greater. These temporary procedures are subject to the same level of review and approval as required for permanent procedures.

2.6 DOCUMENT CONTROL

2.6.1 General

The document control system applies to radioactive material packaging and transportation SSC items, as described below. The system ensures documents defining the performance of activities affecting quality are controlled to ensure only current and correct information is available at the work location prior to commencing the work.

2.6.2 Responsibilities

The Regulatory Affairs Manager has the overall responsibility for the development and implementation of the document control system.

Organization managers are responsible for identifying documents to be included in the controlled document system; ensuring instructions, procedures, drawings, and other specified documents are reviewed for adequacy and approved for release; complying with document distribution requirement; and ensuring these documents are maintained and used by personnel performing the prescribed activity.

to quality, the cause of the condition is determined, documented, and reported to management, with corrective action taken to prevent recurrence. Follow-up actions are taken to verify implementation of corrective actions.

2.16.2 Responsibilities

The manager responsible for the regulatory affairs function is responsible for development, maintenance and implementation of the corrective action control system, including escalation of significant adverse conditions for management review. In addition, this manager is also responsible to ensure follow-up action is taken to verify implementation of the corrective action.

The Nuclear Safety and Quality Manager is responsible for audit and/or surveillance of follow-up action taken to verify implementation of corrective action.

Organization managers are responsible for evaluating and performing assigned corrective actions in a timely manner in accordance with procedures. They are also responsible for assuring the identification and documentation of conditions adverse to quality in accordance with applicable procedures.

2.16.3 Requirements

Procedures are established to assure the following:

A. Conditions adverse to quality, including deficiencies, deviations, defective material or equipment and nonconformances, are promptly identified and corrected.

B. Significant conditions adverse to quality, when identified, are analyzed or evaluated to assure the cause of the condition is determined and corrective action taken to preclude repetition.

C. The significant condition adverse to quality, the cause of the condition, and the corrective action taken are documented and reported to responsible levels of management; follow-up action is taken to verify implementation of the corrective action.

2.17 QUALITY ASSURANCE RECORDS

2.17.1 General

The records management system for items, activities, and services applies to radioactive material packaging and transportation SSC items, as described below.

2.17.2 Responsibilities

The Regulatory Affairs Manager is responsible for the development, maintenance, and implementation of the records management system.