

## Springs, Chanel

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**From:** John Miller [jjmiller@intisoid.com]  
**Sent:** Saturday, July 14, 2012 2:12 AM  
**To:** Bartlett, Matthew  
**Subject:** RE: Question on Possession Limits

The intent of mentioning daughters was that we would expect daughter products in the heel of the cylinder and build-up in the oxide drums, I would agree that these could be described as trace but if we do that then I can see Region II wanting to interpret and confirm "trace" if we leave it as daughter then it is implied that it would be progeny associated with the uranium that we have and not uranium daughters that we have brought on site. Removing phrase as uranium is fine, we put that there just so we were not accounting for the mass of fluorine and oxygen when we were comparing the quantities of DUF6, DUF4 and DU oxides the possession limit.

I think the well would be not considered construction by item (7) of the Construction definition:

(7) Building of service facilities (e.g., paved roads, parking lots, railroad spurs, exterior utility and lighting systems, potable water systems, sanitary sewerage treatment facilities, and transmission lines);

The well will be far enough away from the buildings and even if it weren't the foundation wouldn't be poured yet so the fact that a well is there or was put there would be addressed as part of the foundation design. If we were relying on the well for fire suppression then it would have to be sized accordingly and I agree that it would be a safety system, but we will be relying on a fire water tank that is just filled with water from the well (and probably water from existing wells) so I don't see the well as an issue from a fire suppression stand point.

Enjoy the garden, I am about to leave the hotel and meet up with some guys. We are doing this winery bike tour this morning, weather is not good, but that is fine, we just might get a little wet. Nice to do something different in Vienna.

Have a good weekend.

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**From:** Bartlett, Matthew [<mailto:Matthew.Bartlett@nrc.gov>]  
**Sent:** Friday, July 13, 2012 1:54 PM  
**To:** John Miller  
**Subject:** RE: Question on Possession Limits

Your proposed possession limit for depleted uranium says "depleted uranium and daughters; 750,000kg as uranium." Is the phrase "and daughters" used to account for trace quantities of daughter products? If so, it may be better for the license to say, "depleted uranium and trace daughter products." Is that consistent with your intent in the LA?

Also, the phrase "as uranium" would be removed from after the 750,000 kg, since the scope is already defined by the phrase "depleted uranium and trace daughter products."

Regarding the well:

I don't see any direct link to safety. However, make sure you consider whether the well is needed to support the availability and reliability of an IROFS (e.g., water makeup for a sprinkler system, etc.). I suppose that digging a well could also potentially impact the foundation of some future building which may be an IROFS. As long as you have evaluated those types of things, you should be good to go. Keep in mind that preconstruction is done at risk. If during construction the NRC did identify some nexus to safety and you can't demonstrate that the well is adequate, the well may have to be filled in or redug. Sounds like you have already thought those things through, so you should be good to go.

Hope you have a good weekend. I am going to be working in my garden. ☺

Sincerely,

Matt Bartlett  
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