

Mr. David Tiktinsky  
U. S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, D.C. 20555

DCS-NRC-000318  
11 Jul 2012

Subject: Docket No. 070-03098  
Shaw AREVA MOX Services  
External Hazards Analysis

On 09 May 2012, the Defense Nuclear Facilities Safety Board (DNFSB) submitted a recommendation regarding Savannah River Site Building 235-F located near the MOX Fuel Fabrication Facility (MFFF) currently under construction. As a result of questions regarding any potential impacts on MOX Services, a summary of the evaluation approach is provided below.

External man made hazards (EMMHs) were evaluated by

- Identifying hazards outside of the MFFF site from operation of nearby facilities and vehicles
- Identifying EMMHs that have the potential to affect MFFF operations using guidance from NUREG/CR-4839, *Methods for External Event Screening Quantification: Risk Methods Integration and Evaluation Program (RMIEP) Methods Development*
  - SRS facilities in F area are included in ISAS Table 5.3.1-10 for further evaluation (i.e., has the potential to affect MFFF operations)
- Evaluating the identified EMMHs for impact on MFFF operations
  - Methodology as described in License Application Chapter 5.2, *Integrated Safety Analysis Methods*
  - Evaluation documented in *Nuclear Safety Evaluation of Natural Phenomena Hazards and External Man-Made Hazards*
  - Bounding EMMHs summarized in ISAS Section 5.3.9, *External Man-Made Events*
    - Events at SRS facilities in F area are not the bounding EMMH events and are not specifically discussed in ISAS Section 5.3.9

MOX Services is following the interactions between the DNFSB and the Department of Energy (DOE). DOE recently responded to the DNFSB accepting their recommendations related to 235-F and is in the process of preparing an implementation plan for resulting actions. In the interim, an updated safety basis that reflects the present Surveillance & Maintenance (S&M) mode of the 235-F facility is being prepared that includes appropriate controls to ensure public and worker health and safety are protected. MOX Services will review the S&M safety basis and implementation plan to ensure MOX Services' evaluations

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remain valid. MOX Services will update the NRC on the results of this review by 30 Sep 2012.

If you have any questions, please call me at 803-819-2156 or our Licensing and Nuclear Safety Manager, Dealis Gwyn, at 803-819-2780.

Sincerely,



Kelly Trice  
President and COO

cc :

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