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Your ref:
Our ref: LTR-RAC-12-65

Date: August 15, 2012

SUBJECT: WESTINGHOUSE LICENSE AMENDMENT REQUEST (TAC L33227)

Westinghouse Electric Company LLC (Westinghouse) Columbia Fuel Fabrication Facility herein provides the information necessary to address Title 10 of the Code of Federal Regulations (10 CFR) Part 51 for the amendment request submitted by our letter LTR-RAC-12-57, dated July 6, 2012. The information provided is in response to the August 13, 2012 correspondence issued by the Nuclear Regulatory Commission (NRC) Staff to Westinghouse.

Westinghouse's position is that the categorical exclusion provision under 10 CFR 51.22(c)(11) is appropriate for the requested amendment. The amendment is procedural in nature as it directs the safe processing of these specific Uranium Hexafluoride (UF_6) cylinders using existing Columbia Plant equipment. Applicable discussion follows:

(i) there is no significant change in the types or significant increase in the amounts of any effluents that may be released offsite,
The processing of UF_6 cylinders in the normal course of authorized activities under SNM-1107 includes the appropriate monitoring and reporting of effluents in compliance with governing regulations. The processing of these cylinders results in no change to the amounts of effluents from the facility and introduces no new type of effluent.

(ii) there is no significant increase in individual or cumulative occupational radiation exposure,
The processing of UF_6 cylinders in the normal course of authorized activities under SNM-1107 includes the appropriate radiation protection, monitoring and reporting programs in compliance with governing regulations to ensure that occupational exposures are maintained As Low As Reasonably Achievable (ALARA). The UF_6 cylinders contain authorized material routinely processed at the Columbia Plant. No increase in individual or cumulative occupational radiation exposure is postulated from the handling and processing of these specific UF_6 cylinders over any other UF_6 cylinders.

(iii) there is no significant construction impact.
Construction related activities neither are necessary nor were requested to be authorized within the amendment request.

And (iv) there is no significant increase in the potential for or consequences from radiological accidents.
The Westinghouse revised Integrated Safety Analysis (ISA) Summary provided with the amendment request provided a description of the equipment and process which will be used to process the UF_6 cylinders. The revised ISA Summary includes Items Relied On For Safety (IROFS) Westinghouse has established to ensure that the performance requirements of 10 CFR70.61 are satisfied.

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Furthermore the consequences described within the revised analysis are the same as the already approved ISA Summary and therefore no significant increase in the potential or consequence from postulated radiological accidents is associated with the amendment request.

If you have any questions concerning this correspondence, please contact me at (803) 647-2045.

Sincerely,

Gerard F. Couture, Licensing Manager
Columbia Fuel Fabrication Facility
Westinghouse Electric Company LLC
Docket No. 70-1151, License No. SNM-1107

CC: U. S. Nuclear Regulatory Commission, Region II
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