



August 17, 2012
GDP 12-0027

ATTN: Document Control Desk
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. 70-7001, Certificate No. GDP-1
Certificate Amendment Request (CAR) – Revise Title of Corporate Officer Responsible for Overall
Gaseous Diffusion Plant Safety**

Dear Ms. Haney:

In accordance with 10 CFR 76.45, the United States Enrichment Corporation (USEC) hereby submits a request for amendment to the Certificate of Compliance for PGDP. This Certificate Amendment Request (CAR) proposes to revise TSRs 3.1.1, Responsibility, and 3.10.4, PORC Functions.

The proposed change will change the title of the corporate officer responsible for overall gaseous diffusion plant safety from the current Vice President, Operations to the new Vice President, Enrichment Operations. The roles and responsibilities of the Vice President, Enrichment Operations encompass those of the Vice President, Operations as presently defined in SAR 6.1.1.2. The qualifications for the position of Vice President, Enrichment Operations meet or exceed those specified in SAR 6.1.1.2 for the Vice President, Operations.

Enclosure 1 contains the Oath and Affirmation Statement. Enclosure 2 provides a detailed description and justification for the proposed change. Enclosure 3 is a copy of the revised SAR Introduction, SAR 6.1.1.2, and TSR 3.0 pages associated with this request for NRC approval. The TSR pages are provided for your review and approval. The SAR pages have been evaluated in accordance with 10 CFR 76.68. Based on the results of the 10 CFR 76.68 evaluation, the enclosed SAR pages do not require prior NRC review and approval and are provided for information only. Enclosure 4 contains the basis for USEC's determination that the proposed changes associated with this CAR are not significant.

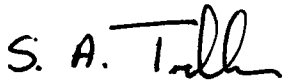
USEC requests NRC review of this CAR as soon as practical. The amendment should become effective 30 days after issuance.

NMS501

Ms. Catherine Haney
August 17, 2012
GDP 12-0027, Page 2

Should you have any questions related to this submittal, please contact me at (301) 564-3250. There are no new commitments contained in this submittal.

Sincerely,

Handwritten signature of Steven A. Toelle in black ink.

Steven A. Toelle
Director, Regulatory Affairs

Enclosures:

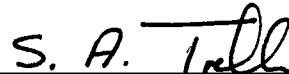
1. Oath and Affirmation
2. United States Enrichment Corporation (USEC), Certificate Amendment Request, Revise Title of Corporate Officer Responsible for Overall Gaseous Diffusion Plant Safety, Detailed Description and Justification of the Changes
3. Certificate Amendment Request, Paducah Gaseous Diffusion Plant, Letter GDP 12-0027, Removal/Insertion Instructions
4. United States Enrichment Corporation (USEC), Certificate Amendment Request, Revise Title of Corporate Officer Responsible for Overall Gaseous Diffusion Plant Safety, Significance Determination

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

Enclosure 1
GDP 12-0027
Oath and Affirmation

OATH AND AFFIRMATION

I, Steven A. Toelle, swear and affirm that I am the Director, Regulatory Affairs of the United States Enrichment Corporation (USEC), that I am authorized by USEC to sign and file with the Nuclear Regulatory Commission this Certificate Amendment Request for the Paducah Gaseous Diffusion Plant addressing revisions to the Technical Safety Requirements contained in USEC letter GDP 12-0027, that I am familiar with the contents thereof, and that the statements made and matters set forth therein are true and correct to the best of my knowledge, information, and belief.



Steven A. Toelle

On this 17th day of August, 2012, the individual signing above personally appeared before me, is known by me to be the person whose name is subscribed to within the instrument, and acknowledged that he executed the same for the purposes therein contained.

In witness hereof I hereunto set my hand and official seal.



Rita Peak, Notary Public
State of Maryland, Montgomery County
My commission expires December 10, 2013

**Rita L. Peak
Notary Public
State of Maryland
County of Montgomery
Expiration 12/10/2013**

Enclosure 2
GDP 12-0027

USEC-01
Certificate Amendment Request
Revise Title of Corporate Officer Responsible for Overall Gaseous Diffusion Plant Safety
Detailed Description and Justification of the Changes

**United States Enrichment Corporation (USEC)
Certificate Amendment Request
Revise Title of Corporate Officer Responsible for Overall Gaseous Diffusion Plant Safety
Detailed Description and Justification of the Changes**

Description of Change

The proposed change will change the title of the corporate officer responsible for overall gaseous diffusion plant safety from the current Vice President, Operations to the new Vice President, Enrichment Operations. This is consistent with a recent corporate organization change which gives the incumbent in this position additional responsibilities beyond those related to PGDP. The roles and responsibilities of the Vice President, Enrichment Operations encompass those of the Vice President, Operations as currently defined in SAR 6.1.1.2. The qualifications for the position of Vice President, Enrichment Operations meet or exceed those specified in SAR 6.1.1.2 for the Vice President, Operations.

The changes shown below are for TSRs 3.1.1 and 3.10.4.d. New wording is shown as underlined. For clarity, only the affected portions of the TSR are shown below. The complete revised TSR pages are shown in Enclosure 3, pages 3.0-2 and 3.0-9. The changes on Enclosure 3 pages are noted with revision bars in the right hand margin. Enclosure 3 also includes associated SAR pages. The changes on the SAR pages have been evaluated in accordance with 10 CFR 76.68 and were determined to not require prior NRC review and approval. The SAR pages are provided for information only.

TSR 3.1, Responsibility

TSR 3.1.1 will be changed to revise the title of the corporate officer. For clarity, only the revised portion of the TSR is shown. The complete revised TSR page is shown in Enclosure 3, page 3.0-2.

3.1 RESPONSIBILITY

3.1.1 The Vice President, Enrichment Operations shall have corporate responsibility for overall gaseous diffusion plant safety and shall have authority to take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety.

TSR 3.10, Plant Operations Review Committee (PORC)

TSR 3.10.4.d will be changed to revise the title of the corporate officer. For clarity, only the revised portion of the TSR is shown. The complete revised TSR page is shown in Enclosure 3, page 3.0-9.

3.10 PLANT OPERATIONS REVIEW COMMITTEE (PORC)

3.10.4 FUNCTIONS

The PORC shall, as a minimum, incorporate functions that:

- d. Notify the Vice President, Enrichment Operations of any safety significant disagreement between the PORC and the General Manager within 24 hours. However, the General Manager shall have responsibility for resolution of such disagreements pursuant to TSR 3.1.2.

Reason for the Changes

As discussed above, the proposed TSR changes revise the title of the corporate officer responsible for overall gaseous diffusion plant safety from the current Vice President, Operations to the new Vice

President, Enrichment Operations. This is consistent with a recent corporate organization change.

Justification of the Changes

The proposed changes to these administrative TSRs are editorial in nature. They change the title of the corporate officer having responsibility for overall gaseous diffusion plant safety. All of the responsibilities and reporting relationships listed in the SAR and TSRs for this position remain unchanged, except that the Director, Regulatory Affairs will now report to the Senior Vice President, Uranium Enrichment instead of to the Vice President Enrichment Operations. The qualifications for Vice President, Enrichment Operations position are unchanged from those described in the SAR for the Vice President, Operations. The proposed changes, therefore, have no adverse effect on safety.

Enclosure 3
GDP 12-0027
6 Pages Total

Enclosure 3
GDP 12-0027

USEC-01
Certificate Amendment Request
Revise Title of Corporate Officer Responsible for Overall Gaseous Diffusion Plant Safety
Removal/Insertion Instructions

Certificate Amendment Request Paducah Gaseous Diffusion Plant Letter GDP 12-0027 Removal/Insertion Instructions	
Remove Pages	Insert Pages
APPLICATION FOR UNITED STATES NUCLEAR REGULATORY COMMISSION CERTIFICATION VOLUME 4	
TSR Section 3.0 Pages 3.0-2, 3.0-9	TSR Section 3.0 Page 3.0-2, 3.0-9

SECTION 3.0 ADMINISTRATIVE CONTROLS

3.1 RESPONSIBILITY

- 3.1.1** The Vice President, Enrichment Operations shall have corporate responsibility for overall gaseous diffusion plant safety and shall have authority to take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety.
- 3.1.2** The General Manager shall be responsible for the overall safe operations of the plant and shall take any measures required to ensure the plant remains in a safe condition. The General Manager or his/her designee shall approve, prior to implementation, each proposed test, experiment, or modification to systems or equipment that affect nuclear safety. The General Manager shall delegate in writing the succession to this responsibility during his/her absence from plant site.
- 3.1.3** The Plant Shift Superintendent (PSS) shall be responsible for the operational aspects of the plant, and for the central control room command function. During any absence from the central control room while the plant is operational, an authorized designee shall be named and be present in the central control room. The term designee means a person who has been trained to execute plant emergency procedures. The designee shall have the capability to be in contact with the PSS using the plant communication systems when the PSS is absent from the central control facility.
- 3.1.4** The Organization Manager shall be responsible for the operations conducted within the facilities affected by this TSR for which he/she is responsible, and shall delegate in writing the succession of responsibility during absence from plant site.

3.2 ONSITE AND OFFSITE ORGANIZATION

3.2.1 Onsite and Offsite

Onsite and offsite organizations shall be established for facility operation and corporate management, respectively. The onsite and offsite organizations shall include the positions for activities affecting the nuclear safety of the gaseous diffusion plant and are described in Section 6.1 of the SAR.

- a. Lines of authority, responsibility, and communications shall be established and defined for the highest management levels through intermediate levels to include operating organization positions. These relationships shall be documented and updated, as appropriate, in the form of organizational charts, functional descriptions of organization responsibilities and relationships, and job descriptions for positions down to and including first-line managers.

SECTION 3.0 ADMINISTRATIVE CONTROLS

3.10.4 FUNCTIONS

The PORC shall, as a minimum, incorporate functions that:

- a. Advise the General Manager on matters related to nuclear safety;
- b. Recommend to the General Manager approval or disapproval of items considered under TSR 3.10.5 prior to their implementation except as provided in TSR 1.6.4 and TSR 3.9.3;
- c. Determine whether each item considered under TSR 3.10.5 requires prior NRC approval before implementation per 10 CFR 76.68 and 76.45.
- d. Notify the Vice President, Enrichment Operations of any safety significant disagreement between the PORC and the General Manager within 24 hours. However, the General Manager shall have responsibility for resolution of such disagreements pursuant to TSR 3.1.2.

3.10.5 RESPONSIBILITIES

The PORC shall be used to conduct, as a minimum, reviews of the following:

- a. All proposed procedures and procedure changes as required by TSR 3.9.2;
- b. All proposed changes to the Safety Analysis Report;
- c. All proposed changes to the Emergency Plan, Quality Assurance Program Description, Physical Security Plan for the Protection of Special Nuclear Material of Low Strategic Significance, Security Plan for the Transportation of Special Nuclear Material of Low Strategic Significance, Security Plan for the Protection of Classified Matter, Fundamental Nuclear Materials Control Plan, Radioactive Waste Management Program, Depleted Uranium Management Plan, Decommissioning Funding Program Description, Environmental Compliance Status Report, and Supplemental Environmental Information Related to Compliance Plan that are included in the certification application.
- d. All proposed changes to the TSRs, the TSR basis statements, the Certificate of Compliance, or the Compliance Plan;
- e. All proposed changes to the plant or the plant's operations, including tests and experiments, that require a written safety analysis in accordance with 10 CFR 76.68.

Personnel minimum qualifications, functions and responsibilities for key staff positions are described below. Throughout this section, equivalent technical experience means the substitution of 2 years of nuclear industry experience for each year of college up to a total of 3 years. Additionally, 30 semester hours or 45 quarter hours from an accredited college or university may be substituted for the remaining 1 year of baccalaureate education. Individuals who do not possess the formal educational requirements specified in this section or do not meet the equivalent technical experience defined above shall not be automatically eliminated where other factors provide sufficient demonstration of their abilities to fulfill the duties of a specific position. These other factors must clearly demonstrate proficiency in the technical area for which the position will be responsible, for example, a license or certification, documented completion of relevant training, or previous experience in the same position at another facility. These other factors shall be evaluated on a case-by-case basis, documented, and approved by the General Manager or appropriate Headquarters management, with the consultation of the human resources organization.

6.1.1.1 Section Deleted

6.1.1.2 Vice President, Enrichment Operations

The Vice President, Enrichment Operations, reports to the Senior Vice President, Uranium Enrichment.

The Vice President, Enrichment Operations, has overall responsibility for safe operations of PGDP including implementation responsibilities for packaging and transportation of radioactive material. The Vice President, Enrichment Operations, is authorized to direct the General Manager to take any specific action, including but not limited to, placing all or any portion of the plant in a safe condition, in order to ensure health and safety of workers and the public, protection of the environment, safeguards (nuclear material control and accountability), security and to achieve or maintain compliance with applicable regulatory requirements. In addition, the Vice President, Enrichment

Operations, must concur with the decision of the General Manager to restart any operation that was directed to be shut down by the Vice President, Enrichment Operations, or by the Nuclear Safety and Quality Manager.

The Vice President, Enrichment Operations, has implementation responsibility for all activities within the PGDP organization, including the functions of operations, maintenance, plant support, engineering, security, transportation, and industrial, radiological, and nuclear safety.

The Vice President, Enrichment Operations, is responsible for both the Quality Assurance Program (QAP) and the Packaging and Transportation Quality Assurance Program (PTQAP), and for determining the status, adequacy, and effectiveness of the QAP and the PTQAP as described in Section 2.2.5 of the QAP and the PTQAP.

The Vice President, Enrichment Operations, has implementation responsibility for packaging and transportation activities within USEC. The Vice President, Enrichment Operations, is responsible for final approval of the design of packaging and design changes to packaging used for radioactive material shipments for which USEC has design authority.

The Vice President, Enrichment Operations, shall have as a minimum a bachelors degree in engineering or the physical sciences or equivalent technical experience, six years nuclear experience, and ten years management experience (which may be concurrent with the nuclear experience).

The Vice President, Enrichment Operations, is appointed by the USEC Board of Directors.

**Enclosure 4
GDP 12-0027**

**USEC-01
Certificate Amendment Request
Revise Title of Corporate Officer Responsible for Overall Gaseous Diffusion Plant Safety
Significance Determination**

Enclosure 4
GDP 12-0027

USEC-01
United States Enrichment Corporation (USEC)
Certificate Amendment Request
Revise Title of Corporate Officer Responsible for Overall Gaseous Diffusion Plant Safety
Significance Determination

The United States Enrichment Corporation (USEC) has reviewed the proposed change associated with this certificate amendment request and provides the following Significance Determination for consideration.

1. No Significant Change to Any Conditions to the Certificate of Compliance
None of the Conditions to the Certificate of Compliance specifically address the subject TSR sections that are being revised. Thus, the proposed changes will have no impact on any of the Conditions to the Certificate of Compliance.
2. No Significant Increase in the Probability of Occurrence or Consequences of Previously Evaluated Accidents
None of the accidents previously evaluated in the certificate application accident analysis will be specifically affected by the proposed change to revise the title of the corporate officer responsible for overall GDP safety. As discussed in the Justification section of Enclosure 2 to this letter, the proposed changes are editorial in nature. Based on the above, the proposed changes will not result in a significant increase in the probability of occurrence or consequences of previously evaluated accidents.
3. No New or Different Type of Accident
The proposed changes do not affect the essential controls for any scenario in the accident analysis. The proposed change does not create any new failure modes or create initiating events that are different than previously evaluated in the SAR. Therefore, the proposed changes will not create a new or different type of accident.
4. No Significant Reduction in Margins of Safety
The proposed changes to TSRs 3.1.1 and 3.10.4 are editorial changes which have no impact on any margins of safety specified in the accident analysis or TSR bases. TSRs 3.1.1 and 3.10.4 have no defined basis statements describing margins of safety. Therefore, the proposed changes do not reduce any TSR margins of safety.

5. No Significant Decrease in the Effectiveness of Any Programs or Plans Contained in the Certificate Application

The proposed changes to TSRs 3.1.1 and 3.10.4 are editorial changes which have no adverse impact on any programs or plans in the certificate application. Therefore, the proposed changes will not decrease the effectiveness of any programs or plans contained in the Certificate Application.

6. The Proposed Changes do not Result in Undue Risk to 1) Public Health and Safety, 2) Common Defense and Security, and 3) the Environment

Due to the fact that there is no significant increase in the probability or consequences of any accident previously analyzed and no new or different type of accident, as discussed in items 2 and 3 above; no decrease in the margins of safety, as discussed in item 4 above; and no decreased effectiveness of the Programs and Plans, as discussed in item 5 above, there will be no undue risk to the public health and safety due to the proposed changes. In addition, the proposed changes will have no impact on plant effluents or on the programs and plans in place to implement physical security, protection of classified matter, transportation security, or special nuclear material accountability. Therefore, the proposed changes to the TSRs will not pose any undue risk to the public health and safety, common defense and security, or the environment.

7. No Change in the Types or Significant Increase in the Amounts of Any Effluents that May be Released Off-Site

The proposed editorial changes to the TSRs do not involve any physical change to the plant or changes to plant operations that could change the types or increase the amounts of any effluents that may be released offsite. Therefore, the proposed changes will not change the type or significantly increase the amount of effluents that may be released offsite.

8. No Significant Increase in Individual or Cumulative Occupational Radiation Exposure

The proposed editorial changes to the TSRs will not affect the radiological protection program description or the actions in place to minimize occupational exposures. Therefore, there will be no significant increase in individual or cumulative occupational radiation exposure as a result of the proposed changes.

9. No Significant Construction Impact

These proposed changes will not require any construction. Therefore, since there will be no construction, there will be no significant construction impacts associated with the proposed changes.