



Global Nuclear Fuel

A Joint Venture of GE, Toshiba, & Hitachi

Global Nuclear Fuel

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U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555-0001

Subject: GNF-A CWS Action Updates

- References:
- 1) NRC License SNM-1097, Docket 70-1113
 - 2) Letter, S.P. Murray to Document Control Desk, 30 Day Report of Event – Criticality Accident Alarm System Degradation, 8/12/11
 - 3) GNF-A Notice of Violation, NRC Inspection Report No. 70-1113/2012-007, 4/23/12
 - 4) GNF-A Event Report 48100, 7/12/12
 - 5) Letter, S.P. Murray to Document Control Desk, 30-day Report of Event – Criticality Accident Alarm System Horns Inoperable, 8/10/12
 - 6) Letter, S.P. Murray to Document Control Desk, Revised Completion Date for Reportable Event Longer Term Preventive Action, 9/10/12

Dear Sir or Madam:

The purpose of this letter is to provide the NRC with status updates on actions associated with criticality warning system (CWS) issues (References 2 & 4).

Verification Testing Frequency

As described in NRC Inspection Report No. 70-1113/2012-007 (Reference 3), in August 2011, GNF-A initiated several short term corrective actions following a criticality warning system (CWS) signal activation component failure. These actions included 1) diagnosis and repair of the failed component in the horn activation system, 2) performance of extensive CWS requalification tests, 3) upgrade of the CWS test procedure, 4) additional weekly verification testing and augmented area audibility testing, 5) installation of a parallel alarm monitoring system, 6) enhanced monthly system testing to include verification of detector response and calibration, expanded audibility testing participation, and system alarm response time monitoring.

Based upon documented performance after performing these actions for the past 18 months, GNF-A has determined that the weekly CWS verification tests (action 4) are included in other routine tests or can be scheduled on an as needed basis and the monthly testing (action 6) can be changed to quarterly without loss of surveillance effectiveness. As a result, the CWS test procedures have been revised to reflect the change in testing frequencies.

CWS Coverage for WFSC

In addition, on August 10, 2012 Global Nuclear Fuel – Americas L.L.C. (GNF-A) submitted a 30 day written report (Reference 5) as amended (Reference 6) in response to Event Notification 48100. The immediate and short-term corrective actions were completed for this event.

A longer-term preventive action from this report was to submit a license amendment to NRC to remove the criticality alarm requirements from the Wilmington Field Service Center (WFSC) with a scheduled completion date of December 28, 2012. Upon further review and regulatory analysis, another option to address this issue has been identified.

Pursuant to the requirements in 10 CFR 70.24(a):

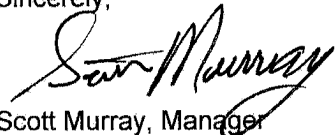
- a) Each licensee authorized to possess special nuclear material exceeding 700 grams of contained U-235... shall maintain in each area where such licensed special nuclear material is handled, used, or stored a monitoring system... which energize clearly audible signals if accidental criticality occurs.

Licensed activities at the WFSC are limited to those using activation, by-product, and limited quantities of special nuclear material (SNM) authorized by a NC agreement state license. Instead of a license amendment, a physical barrier consisting of a chain link fence with controlled access will be installed to separate WFSC licensed activities from NRC licensed activities and to prevent additional movements of SNM to the WFSC areas,

The physical barrier is scheduled to be installed during the fourth quarter 2013 and the CWS coverage for the WFSC areas is scheduled to be discontinued after the fence installation is complete.

If you have any questions regarding this matter, please contact me at (910) 819-5950.

Sincerely,



Scott Murray, Manager
Facility Licensing

Commitments: None

cc: NRC Region II Administrator, Atlanta, GA
M. Sykes, NRC RII Atlanta. GA
M.L. Thomas, NRC RII Atlanta. GA
M.N. (Nick) Baker, NRC NMSS, Washington, DC