

## SAFEGUARDS EVALUATION REPORT

DOCKET: 70-1113

LICENSEE: Global Nuclear Fuel – Americas, LLC  
Wilmington, North Carolina

SUBJECT: GLOBAL NUCLEAR FUEL – AMERICAS, LLC – CHANGES TO MATERIALS  
LICENSE SNM-1097 AND AMENDMENT 9 (TECHNICAL ASSIGNMENT  
CONTROL NO. L33325)

### BACKGROUND

In a letter dated March 27, 2014, Global Nuclear Fuel – Americas, LLC (GNF-A) submitted a record of administrative changes made by the licensee to amend Materials License SNM-1097. Global Nuclear Fuel-Americas, LLC is authorized, under Section 1.3.1.2 of its License Application, to make changes without prior U.S. Nuclear Regulatory Commission (NRC) approval, in accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) Paragraph 70.72(c).

### DISCUSSION

The staff reviewed the following changes:

Chapter 1, Section 1.3.1.2, Changes Not Requiring Prior NRC Approval – Language was added to a described authorization for making a change to the License application. The added language mirrored the wording specified in 10 CFR 70.72(c)(2), ‘..and is necessary for compliance with the performance requirements of 10 CFR 70.61.’

Chapter 1, Section 1.3.1.2, Changes Not Requiring Prior NRC Approval – Language was added to a described authorization for making a change to the License application. The added language mirrored the wording specified in 10 CFR 70.72(c)(3), ‘preventing or mitigating.’

Chapter 2, - Figure 2.1, GNF-A Organizational Chart, Section 2.2.1.8, Chemical and Fire Safety Function, and Section 2.2.1.9, Site Security and Emergency Preparedness Function. Changes were made to reflect the current organizational structure.

Chapter 4, Section 4.11.1, Calibration – Change the portable radiation detection instrumentation calibration frequency from six months to annual, in conformance to NRC Regulatory Guide 8.24 and American National Standards Institute (ANSI) N323A.

Chapter 5, Section 5.3.2.5, Criticality Warning System Design and Performance Requirements – Update the name (formerly Criticality Warning System to Criticality Accident Alarm System [CAAS]) used to describe the criticality monitoring system in conformance to ANSI/ANS 8.3.

Chapter 7, Section 7.9, Fire Protection Water System - Delete reference to fire hose ‘on reels’ as part of the fire protection system. In the event of fire, onsite and offsite responders use their own hoses, making the industrial hoses unnecessary. This change was approved by both the New Hanover County Fire Marshall and the Facility Insurance Underwriter.

Chapter 8, Radiological Contingency Emergency Plan – Modify the date in the License Application to the most current NRC approved plan, December 7, 2012.

Chapter 10, Decommissioning – Modify the date in the License Application to the most current NRC approved plan, December 14, 2012.

Chapter 11, Section 11.1.2, Graded Application of Management Measures – Correction of references to Chapter 3.

### ENVIRONMENTAL REVIEW

According to 10 CFR 51.22(c)(11), the issuance of amendments to licenses for fuel cycle plants which are administrative, organizational, or procedural in nature—or which result in a change in process operations or equipment—are eligible for categorical exclusion provided that:

- i. There is no significant change in the types or significant increase in the amounts of any effluents that may be released offsite.
- ii. There is no significant increase in individual or cumulative occupational radiation exposure.
- iii. There is no significant construction impact.
- iv. There is no significant increase in the potential for or consequences from radiological accidents.

The changes in this amendment do not affect the scope or nature of the licensed activity and will not result in a significant change in the types or amounts of effluents released offsite. There will not be any significant increase in individual or cumulative occupational radiation exposure, and there will not be any significant increase in the potential or consequences from radiological accidents. There is no construction associated with these changes, so there will not be any impact from construction.

### CONCLUSION AND RECOMMENDATION

Based on the review and evaluation of the licensee's submittal, the staff has determined that the proposed changes to the License Application are administrative in nature and the commitments continue to ensure effective programs at the GNF-A facility. Approval of the amendment is recommended.

### PRINCIPAL CONTRIBUTOR

Tyrone D. Naquin