

## Regulatory Guide Periodic Review

Regulatory Guide Number: **3.55**

Title: **Standard Format and Content for the Health and Safety Sections of License Renewal Applications for Uranium Hexafluoride Production**

Office/division/branch: **NMSS/DFCSS/ MC&AB**

Technical Lead: **Matthew Bartlett**

Recommended Staff Action: **Revise**

**1. What are the known technical or regulatory issues with the current version of the Regulatory Guide (RG)?**

The current version of the Regulatory Guide uses a format which is out of date. In addition it does not provide any guidance on how to implement integrated safety analysis requirements which are typically required by license condition for fuel cycle facilities. The regulatory guide also failed to reference any of the standard review plans which are commonly used to review fuel cycle applications.

**2. What is the impact on internal and external stakeholders of not updating the RG for the known issues, in terms anticipated numbers of licensing and inspection activities over the next several years?**

This regulatory guide is intended for use in renewals for uranium hexafluoride facilities (e.g., Honeywell and International Isotopes Inc. [INIS]). Honeywell is scheduled to renew their license in 2017 and INIS in 2050. Honeywell is the only facility in the near term that the staff has determined to be significantly impacted by RG3.55. Updating the RG prior to this renewal would improve the licensee's application and provide needed guidance for addressing integrated safety analysis (ISA) requirements.

A Part 40 rulemaking to incorporate ISA requirements for certain source material facilities has been postponed for further NRC evaluation. The rulemaking is not anticipated to be completed until after Honeywell's next license renewal.

**3. What is an estimate of the level of effort needed to address identified issues in terms of full-time equivalent (FTE) and contractor resources?**

0.2-0.5 FTE is anticipated to be needed to complete the RG in 2014 and 2015, depending on the level of questions from stakeholders. No contract dollars are anticipated to be needed.

4. **Based on the answers to the questions above, what is the staff action for this guide (Reviewed with no issues identified, Reviewed with issues identified for future consideration, Revise, or Withdraw)?**

The staff plans to revise this RG to update the formatting requirements, incorporate guidance for ISAs, and reference existing standard review plans.

5. **Provide a conceptual plan and timeframe to address the issues identified during the review.**

The draft guide will be transmitted to the Regulatory Guidance and Generic Issues Branch in the Office of Nuclear Regulatory Research in the near future. The draft guide is anticipated to be issued for public comment in early 2015.

**NOTE: This review was conducted in April, 2014 and reflects the staff's plans as of that date. These plans are tentative and subject to change.**