

February 27, 2015

MEMORANDUM TO: Robert K. Johnson, Chief  
Fuel Manufacturing Branch  
Division of Fuel Cycle Safety, Safeguards,  
and Environmental Review  
Office of Nuclear Material Safety  
and Safeguards

FROM: Soly I. Soto, Project Manager **/RA/**  
Fuel Manufacturing Branch  
Division of Fuel Cycle Safety, Safeguards,  
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Office of Nuclear Material Safety  
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SUBJECT: MEETING SUMMARY OF FEBRUARY 10, 2015, CONFERENCE  
CALL TO DISCUSS AREVA'S AMENDMENT REQUEST TO  
INCREASE U-235 POSSESSION LIMITS

On February 10, 2015, the U.S. Nuclear Regulatory Commission (NRC) staff participated in a conference call with AREVA, Inc. Richland Facility (AREVA) staff to discuss AREVA's license amendment request to increase its U-235 possession limits dated September 23, 2014. The purpose of the meeting was to clarify some areas from the submittal with regards to fire safety.

The following is my report on the activities we discussed:

#### Fire Safety

The request states that "the current fire protection program, including internal prevention, detection and response measures supplemented by offsite response support, will remain fully adequate." The following areas were discussed:

- Description of the physical design of the uranium hexafluoride (UF<sub>6</sub>) cylinder storage facilities.
- Description of "internal prevention" applicable to the UF<sub>6</sub> cylinder storage facilities.
- Description of any controls (sloped storage pad, fuel type restrictions, fuel tank limits, etc.) to prevent the accumulation of flammable liquid beneath the cylinders, especially from vehicles operating around the stored cylinders.
- Description on the "detection and response measures" applicable to the UF<sub>6</sub> cylinder storage facilities.

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- Discussion on the fire protection controls mentioned in the “Emergency Preparedness Impact” section (storage area design features, limitations on presence of combustibles, control of ignition sources, and fire response measures).

AREVA provided further information with regards to the description of the physical design of the UF<sub>6</sub> cylinder storage facilities. The licensee indicated that physical design of the UF<sub>6</sub> cylinder storage facilities are outdoor, concrete storage pads. AREVA indicated that there is a possibility that they may have to build additional storage pads depending on the quantity of cylinders they have or expect to have on site which would be constructed using requirements that were used to build those existing, such as a sloped surface to prevent pooling of flammable liquids. However, AREVA stated in their submittal that “the increased interim storage does not translate into an increase in plant production throughput; introduces no new processes, waste streams, or environmental effluents; and can be fully accommodated on already-available UF<sub>6</sub> cylinder storage facilities.” In addition, when describing the internal prevention applicable to UF<sub>6</sub> cylinder storage facilities, AREVA stated that existing items relied on for safety (IROFS) applicable to UF<sub>6</sub> storage areas, as described in their Integrated Safety Analysis (ISA) Summary – combustible controls (IROFS 4502) and monthly surveillance (IROFS 4503) – will be applied to all UF<sub>6</sub> cylinder storage pads. The NRC staff will review these IROFS in the ISA Summary and associated accident events to continue its technical safety review.

Meeting Participants: Soly I. Soto, NRC  
James Downs, NRC  
Tim Tate, AREVA  
Calvin Manning, AREVA  
Loren Maas, AREVA  
Jeff Deist, AREVA

Docket No.: 70-1257  
License No.: SNM-1227

- Discussion on the fire protection controls mentioned in the “Emergency Preparedness Impact” section (storage area design features, limitations on presence of combustibles, control of ignition sources, and fire response measures)

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