

From: Naquin, Tyrone
Sent: Friday, August 07, 2015 2:03 PM
To: Murray, Scott P. (GE Power & Water) (Scott.Murray@ge.com)
Subject: NPH Extension Request

Mr. Scott P. Murray, Manager
Licensing & Liabilities
Global Nuclear Fuel-Americas
3901 Castle Hayne Road
P.O. Box 780 – M/C K-84
Wilmington, NC 28401

Dear Mr. Murray,

On July 22, 2015, Global Nuclear Fuels – Americas (GNF-A) sent a letter in response to US Nuclear Regulatory Commission (NRC) Generic Letter (GL) 2015-01, 'Treatment of Natural Phenomena Hazards (NPH) in Fuel Cycle Facilities,' requesting an extension to respond to the GL until January 29, 2016. GNF-A stated the extension was needed in order to document the ongoing NPH analysis in the Integrated Safety Analysis (ISA), incorporate guidance from the newly issued Fuel Cycle Safety, Safeguards, and Environmental (FCSE) Interim Staff Guidance (ISG) - 15, and update the ISA Summary on schedule with the normal submittal of annual summary of changes in accordance with 10 CFR 70.72(d)(3).

The GL requires a written response and offered direction for a licensee unable to meet the requested response date. Required in any request for extension is an alternative course of action, the basis for acceptability of the alternative course, and estimated completion dates. Staff found that your request lacked an adequate basis for granting an extension. On August 3, 2015, a teleconference was held with GNF-A and NRC staff to understand your request to delay a response. GNF-A discussed initiatives begun at GNF-A in the Dry Conversion Process and Fuel Manufacturing Operations Buildings in developing a response to both the GL and an Unresolved Item (URI) 70-1113/2012-006-01 addressing the NPH issues. GNF-A stated the data gathered has yet to be evaluated for any determination in answering the requests of the GL and additional actions are necessary for completion of the NPH analyses.

In order to approve your request for an alternative schedule, further written information is required to establish an adequate basis for acceptability. By September 22, 2015, submit to the Document Control Desk, a response that includes: 1) A description of the work that has been completed to date, including a general description of the type of work, what facilities are affected, and the status of these actions; 2) A description of the work that remains to be completed and what facilities are involved; 3) An explanation for not being able to submit a 90 day response to the GL; and 4) A commitment to provide a formal response by the requested date of January 29, 2016, addressing items (1)a. through (1)d. of the GL and including a formal statement of compliance, signed under oath or affirmation as required.

Your letter, in response to this correspondence, will be documented as a license condition, amending your license until the actions set forth in your response are completed. This email will be docketed in ADAMS. If you have any questions or would like to discuss further, please contact me at (301) 415-7352 or at Tyrone.naquin@nrc.gov.

Ty Naquin

T. D. Naquin, CHP
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(301) 415-7352

