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Subject: Final Summary of 11/6 Call w/NFS re: Generic Letter Response
Date: Tuesday, November 10, 2015 2:37:00 PM

On November 6, 2015, NRC staff conducted a call with Nuclear Fuel Services (NFS) regarding its response to Generic Letter 2015-01, "Treatment of Natural Phenomena Hazards in Fuel Cycle Facilities." The following individuals participated:

Kevin Ramsey, NRC
Jonathan Marcano, NRC
Carmen Rivera, NRC
John Stamatkos, CNWRA
Asadul Chowdhury, CNWRA
Andy Sabisch, NFS
Nick Brown, NFS

NFS staff were asked to explain the response that no accident sequences were identified for natural phenomena events. NFS staff explained that natural phenomena events were compared to accident sequences already identified. The existing accident sequences evaluated spills and releases but all possible initiating events were not distinguished. They stated that all consequences from natural phenomena events were bounded by an existing accident sequence. The response to the generic letter was based on the fact that no new, unanalyzed accident sequences were identified by its evaluation of natural phenomena events. NRC staff asked if NFS could provide a description of the bounding accident sequences which led it conclude that there were no additional accident sequences. NFS agreed to submit a description of bounding accident sequences.

NRC staff asked if the building codes, design basis and analysis for each structure, which NFS had trouble providing previously, could now be provided. NFS staff explained that some older building codes either (1) could not be identified, or (2) did not address seismic requirements. The seismic evaluation performed in 2014 is intended to fill the gap in the design basis information. The final evaluation has not been published yet, but NFS expects to receive it by the end of the year. The report will be available for review onsite because the evaluation of structures housing classified processes will likely be controlled as classified information. NFS suggested having the vendor for the seismic evaluation brief NRC staff when they visit the site.

It was noted that a project to provide an updated evaluation of flooding hazards is being started. The results of flooding study are not expected until mid-2016. NRC stated that it expects to proceed with a site visit when the seismic evaluation report is available.

NRC staff requested the basis for the tornado probabilities in its ISA Summary. NFS stated that it could not validate those numbers and stated that it would replace them with validated numbers during the next annual update. The new probabilities are in the range of 1E-5, which is still considered highly unlikely.

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