AREVA

May 9, 2016
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US Nuclear Regulatory Commission
Director, Office of Nuclear Material Safety
and Safeguards
Attn: Document Control Desk
11555 Rockville Pike
One White Flint North
Rockville, MD 20852

Gentlemen:

Subject: Notification of Changes to Chapters 2 and 7 of License No. SNM-1227; AREVA Inc. Richland Facility (Docket No. 70-1257)

The purpose of this correspondence is to inform the NRC of changes being made to Chapter 2, Organization and Administration, and Chapter 7, Fire Safety, of License No. SNM-1227 for AREVA Inc.'s Richland site. These changes are judged by AREVA to meet the criteria in License Condition 1.2.5.11 of License No. SNM-1227 and thus can be implemented without prior NRC approval. The changes to Chapters 2 and 7 are discussed separately below.

Chapter 2, Organization and Administration

The changes in Chapter 2 reflect the redistribution of program management responsibilities for certain safety programs at AREVA's Richland fuel fabrication facility. Specifically the change involves moving program management responsibility for two safety areas – security and emergency management – from the Safety Function as currently defined in SNM-1227, Chapter 2, to a newly created Security and Emergency Preparedness Function. The purpose behind this redistribution is to reduce the management scope of the Safety Function by splitting it into two functions – a Safety Function of reduced scope and a new Security and Emergency Preparedness Function. The Safety Function will retain management of the industrial safety, industrial hygiene, and fire protection programs, with security (physical protection) and emergency management moving to the newly created Security and Emergency Preparedness Function.

The change constitutes an increase in management resources applied to safety programs within the Environmental, Health, Safety and Licensing Department (EHS&L) and as such will not constitute a decrease in the effectiveness of the site's overall safety management. Accordingly, AREVA is implementing this program management redistribution as a change meeting the criteria of License Condition 1.2.5.11, License Application Changes Without NRC Pre-Approval, of License SNM-1227. AREVA intends to formally implement this change in June 2016.

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AREVA INC.

2101 Horn Rapids Road, Richland WA 99354
Tel.: 509 375 8100 - www.areva.com

Chapter 7, Fire Safety

The revisions to Chapter 7 reflect two minor changes/improvements relative to portable fire extinguishing equipment as well as a revision to reflect an organizational change approved by the NRC in a prior license amendment. With respect to fire extinguishing equipment, Section 7.5.4 is being revised to remove references to portable CO_2 fire extinguishers as well as the site's portable AFFF (aqueous film-forming foam) trailer. The CO_2 fire extinguishers are being replaced with dry chemical extinguishers providing equivalent or better fire suppression performance. AFFF capability is available on the response equipment of the Richland Fire Department with a response time to the site of typically twelve (12) minutes or less. As such the RFD is both a more reliable and prompt provider of AFFF for the sake of fire suppression. The changeout of the CO_2 extinguishers is ongoing but not yet complete; the AFFF trailer will be removed from service in the coming months. Both changes will result in at least equivalent, more likely improved, fire safety performance. As such the criteria of License Condition 1.2.5.11 are clearly met.

Section 7.1.1, Fire Safety Organization, still indicated that the Site Maintenance Function reported to the Site Operations Manager. Removal of the Maintenance Function from the scope of the Operations Function was approved by the NRC in an earlier license amendment (Amendment No. 5; August 8, 2012; TAC No. L 33208). Failure to revise this section of Chapter 7 was an administrative oversight of AREVA at that time. As such this revision is already fully approved and implemented and requires no further NRC pre-approval action at this time.

Attached please find revised Chapters 2 and 7 of AREVA's special nuclear materials license (SNM-1227). Revisions to the chapters are listed on the accompanying Nature of Changes pages. If you have questions, please feel free to contact me at 509-375-8550.

Very truly yours,

T. J. Tate, Manager
Environmental, Health, Safety, & Licensing

c:
U.S. Nuclear Regulatory Commission
Office of Nuclear Material Safety and Safeguards
11545 Rockville Pike
Attn: Leira Cuadrado
Mail Stop: TWFN-4A60
Rockville, MD 20852-2738

U.S. Nuclear Regulatory Commission, Region II
Marquis One Tower
Attn: TA Vukovinsky, DFFI/PB2
245 Peachtree Center Ave. NE, Suite 1200
Atlanta, GA 30303