



June 21, 2016  
ACO 16-0024

ATTN: Document Control Desk

Ms. Melanie Galloway, Director  
Division of Security Policy  
Office of Nuclear Security and Incident Response  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555-0001

**American Centrifuge Lead Cascade Facility  
Docket Number 70-7003; License Number SNM-7003**

**Submittal of Changed Pages of the Emergency Plan for the American Centrifuge Lead Cascade Facility**

Dear Ms. Galloway:

**Purpose**

In accordance with 10 *Code of Federal Regulations* (CFR) 70.32(i), American Centrifuge Operating, LLC hereby submits to the U.S. Nuclear Regulatory Commission (NRC) changed pages of the Emergency Plan for the American Centrifuge Lead Cascade Facility as Enclosure 1 of this letter.

**Discussion**

The changes noted in Enclosure 1 have been reviewed in accordance with 10 CFR 70.32 and have been determined not to decrease the effectiveness of the applicable plan. Revision bars in the right hand margin depict changes from the previous revision submitted to the NRC.

**Action**

No specific action is requested concerning this submittal.

American Centrifuge Operating, LLC  
3930 U.S. Route 23 South – P.O. Box 628  
Piketon, OH 45661

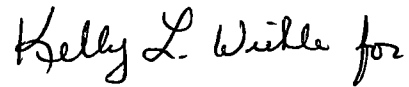
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**Contact**

If you have any questions regarding this matter, please contact me at (740) 897-2887.

Sincerely,



Jonathan K. Corrado  
Regulatory Manager

Enclosure: As Stated

cc: J.R. Downs, NRC HQ  
Y.H. Faraz, NRC HQ  
T.A. Grice, NRC HQ  
L.W. Pitts, NRC Region II  
O. Siurano-Perez, NRC HQ  
M.D. Sykes, NRC Region II  
T.A. Vukovinsky, Region II

**Enclosure 1 to ACO 16-0024**

**Changed Pages of the Emergency Plan for the American Centrifuge Lead Cascade Facility**

**Information contained within  
does not contain  
Export Controlled Information**

**Reviewer: G. Peed  
Date: 06/20/16**

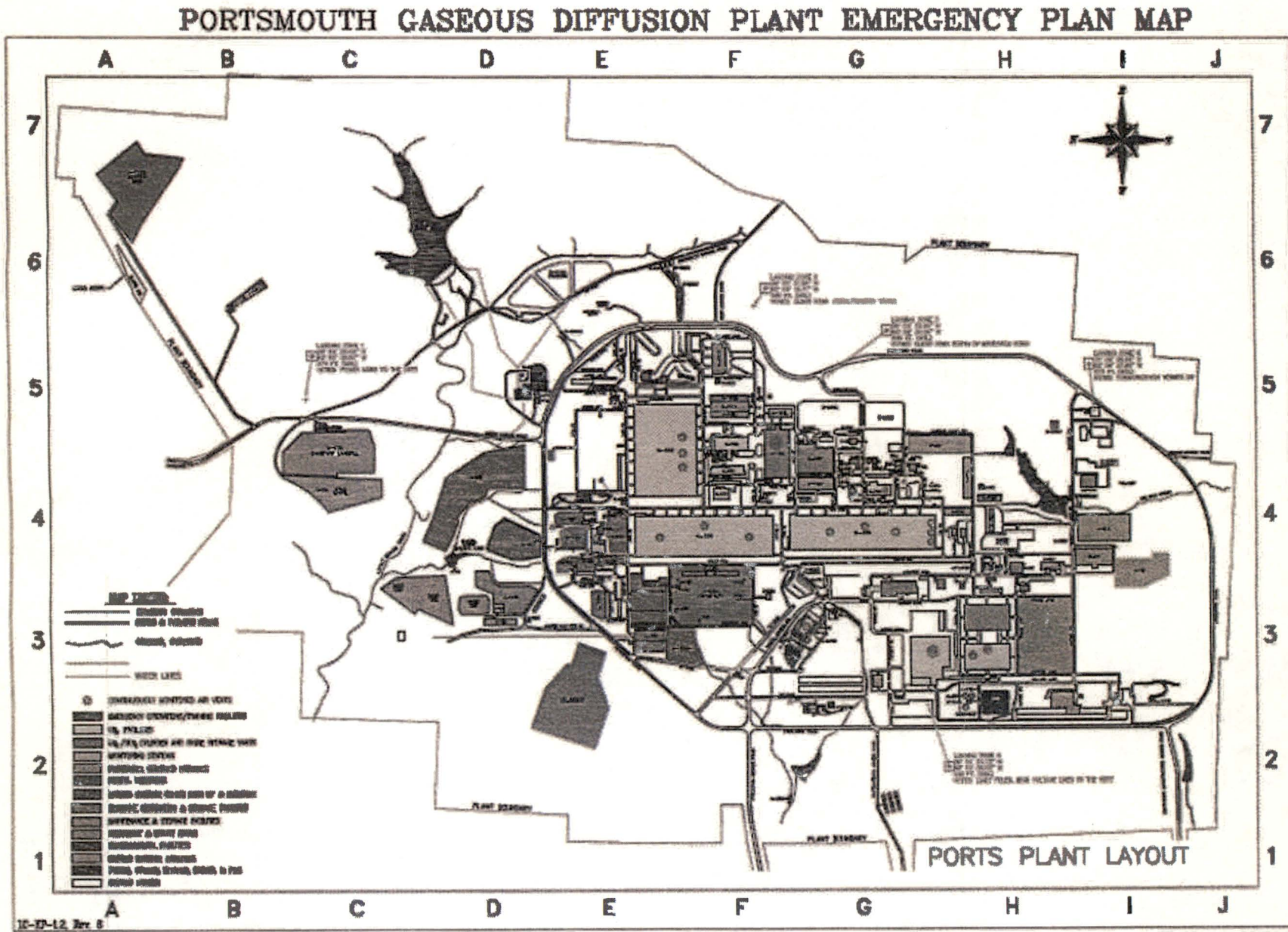


Figure 1-2 PORTS Plant Layout





## 2. TYPES OF ACCIDENTS AND OTHER EMERGENCIES

### 2.1 FUEF DOE-REGULATED OPERATIONS

Hazards and consequence analyses reflected in FUEF Basis for Interim Operation (BIO) and supporting analysis, Process Hazard Analysis (PHAs), and Emergency Planning Hazard Assessments and in the DOE DSA and hazard assessments for the DUF<sub>6</sub> Conversion Facility and for the Category 2 Non-leased Facilities form the basis for emergency preparedness planning.

This Plan is based upon an evaluation of the risks associated with various accident scenarios identified in the site-specific hazards analyses for PORTS and other potential emergency situations at PORTS. Those analyses concluded that the most extreme credible scenario would be an accident involving a large UF<sub>6</sub> release. The analyses included consideration of the risks associated with the potential release of other hazardous radioactive and non-radioactive materials stored or used onsite. These other hazardous materials are identified in the Material Safety Data Sheets/Safety Data Sheets (MSDS/SDS); the chemical inventory; information from the Safeguards and Security Plan; the Spill Contingency, Control, and Countermeasures Plan; and Hazardous Waste Contingency Plans.

Due to the small quantity of licensed material ( $\leq 250$  kg UF<sub>6</sub>), the consequences of any Lead Cascade accident postulated in the ISA would be minor when compared to the postulated accidents at the FUEF. Therefore, postulated accidents addressed in the Plan bound identified Lead Cascade accidents.

Each type of credible accident or event that could result in an emergency associated with these hazards has been identified and analyzed to assess the potential consequences to plant workers, the public, the environment, and onsite and offsite property.

This Plan is applicable to radiological and non-radiological accidents or other emergencies that could occur at the site, including the following:

1. Hazardous materials (HAZMAT) releases involving toxic or radioactive materials;
2. Equipment failures and industrial accidents;
3. Natural phenomena, such as tornadoes and earthquakes, and fires; and
4. Security-related events, such as bomb threats and civil disturbances.

#### 2.1.1. Description of Postulated Accidents and Other Emergencies

Various hazardous materials are used or stored at the reservation. Accidents involving the release of these materials could require an emergency response. Fires, a nuclear criticality event, or severe natural phenomena could also require an emergency declaration and/or response.

#### **4.1.1.11 Protective Force Manager**

The Protective Force Manager is responsible for plant police services and security.

#### **4.1.2 USEC Inc. Organization**

##### **4.1.2.1 General Manager, American Centrifuge Plant Operations**

As described in Chapter 2.0 of the license application, the General Manager, American Centrifuge Plant Operations is responsible for the day-to-day management of Licensee activities in the Lead Cascade. The General Manager, American Centrifuge Plant Operations also oversees activities of line management organizations that support Lead Cascade operations, as applicable. The General Manager, American Centrifuge Plant Operations may delegate responsibility for this day-to-day interface to the Organizational Managers.

##### **4.1.2.2 Organizational Managers**

As described in Chapter 2.0 of the license application, the Organizational Managers are responsible for managing the activities in their area of responsibility in direct support of the Lead Cascade. These managers oversee engineering; operations; maintenance; environmental; waste management; records management; procedures and training; radiation protection and health physics, fire services, emergency management, quality assurance, and security.

##### **4.1.2.3 Fire Safety/Emergency Management Manager**

The Fire Safety/Emergency Management Manager is responsible for maintenance and control of the Plan. The Fire Safety/Emergency Management Manager has established an agreement with the DOE for emergency management program support, fire services testing and inspections, emergency response and event notification.

##### **4.1.2.4 Operations Shift Supervisors**

As the senior manager on shift (one per shift), the Operations Shift Supervisor represents the General Manager, American Centrifuge Plant Operations and has the authority and responsibility to make decisions, as necessary, to ensure safe operations. The Operations Shift Supervisors are responsible for accumulation and dissemination of information regarding plant activities to the IC during emergencies. The Operations Shift Supervisors are also responsible for directing the operation of systems within the facilities necessary to support the Lead Cascade enrichment operation.

#### **4.2 ONSITE EMERGENCY RESPONSE ORGANIZATION**

The ERO is responsible for taking immediate mitigative and corrective actions to minimize the consequences of an incident to workers, public health and safety, and the environment. The ERO is staffed with trained personnel who respond to events and are required to participate in formal training, drills, and exercises. The ERO is comprised of personnel from USEC Inc. and DOE Contractors/Subcontractors from various site entities. The incident type and severity dictate the level of ERO activation.

**FBI** — Federal Bureau of Investigation.

**FEMA** — Federal Emergency Management Agency.

**FUEF** — Former Uranium Enrichment Facilities.

**GCEP** — Gas Centrifuge Enrichment Plant.

**GET** — General Employee Training.

**Hazardous Material (HAZMAT)** — Any solid, liquid, or gaseous material that is toxic, flammable, radioactive, corrosive, chemically reactive, or unstable upon prolonged storage in quantities that could pose a threat to life, property, or the environment.

**HFS** — HF Storage System.

**HQ** — Headquarters.

**HVAC** — heating, ventilation, and air conditioning.

**IC** — Incident Commander.

**Immediate Notification Area** — An area that extends approximately two miles from the center of the plant in which members of the public would be notified by PWS sirens in the event of an emergency.

**ISA** — Integrated Safety Analysis.

**JPIC** — Joint Public Information Center.

**LCC** — Local Control Center.

**LEPC** — Local Emergency Planning Committee.

**Letter of Agreement** — An agreement drawn up between the plant and offsite local governments or other organizations for assistance in the event of an emergency (also called Memorandum of Understanding, Mutual Aid Agreement, Memorandum of Agreement and/or Letter of Assistance).

**MSDS/SDS** — Material Safety Data Sheet/Safety Data Sheet.

**NRC** — U.S. Nuclear Regulatory Commission.

**NWS** — National Weather Service.

**OROC** — Oak Ridge Operations Center.

**OSHA** — U.S. Occupational Safety and Health Administration.

**PA** — Public Address.

**PCF** — Plant Control Facility.