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BWX Technologies, Inc.

February 17, 2017  
17-008

M. Nick Baker, Senior Project Manager  
Mail Stop T4A60  
Division of Fuel Cycle Safety and Safeguards, NMSS  
U.S. Nuclear Regulatory Commission  
11545 Rockville Pike  
Rockville, MD 20852

References: (1) License SNM-42, docket No. 70-027  
(2) Letter dated January 30, 2012, M.D. Sykes (NRC) to R.P. Cochran (B&W NOG), NRC Inspection report 70-27/2011-005 and Notice of Violation  
(3) Letter dated March 12, 2012, B.L. Cole (B&W) to M.N. Baker (NRC), Demonstration of Absence of Special Nuclear Material in Acids Exposed to Clad Fuel Components  
(4) Letter dated October 30, 2014, M.D. Sykes (NRC) to B.J. Burch (B&W NOG), Babcock and Wilcox Nuclear Operations Group- Nuclear Regulatory Commission Integrated Inspection Report 70-27/2014-004 and Inspection Report 70-27/2014-204

Subject: Confirmation of Designation for New Pickle Facility

Dear Mr. Baker:

BWXT Nuclear operations Group - Lynchburg (BWXT NOG-L) is currently constructing a new facility dedicated to pickling operations. The new facility will be built adjacent, tangential, and attached to the existing bays that currently house the operations. It is intended that the new facility will be substantially similar in scope and methods as the current facility, with some modernization and modifications to account for lessons learned with the existing facility. The analyzed accident sequences and the hazards on which they are based will be identical to the current work location, with the exception of actual location.

Derived from: DOE-DOD Classification Guide  
CG-RN-1 Revision 3 dtd February 1996  
RESTRICTED DATA

This document contains Restricted Data as defined in the Atomic Energy Act of 1954. Unauthorized disclosure subject to Administrative and Criminal Sanctions.

Classified by: 2/17/17  
(Enter name and title if signer is not a classifier.)

VINCENT ST. AUGUSTINE

Unclassified when classified  
enclosure(s) is removed.

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Both facilities will run in parallel while qualification of the new systems is underway and it is anticipated that the new facility will eventually replace the existing facility in whole after this qualification period.

In accordance with 10 CFR 70.72(c), BWXT NOG-L has performed an evaluation and determined that a SNM-42 License Amendment is not required to bring the new Pickle facility on line since the new facility is merely an extension of currently approved operations and no new types of accident sequences will need to be developed. Similar to current practices, BWXT NOG-L also has determined that the pickling operations in the new facility will not create new accident sequences exceeding the performance criteria of §70.61. The acid used in the pickling operations should continue to not be considered licensed material nor a hazardous chemical produced from licensed material.

The attached enclosures document a thorough examination of industry literature and site sampling which continue to demonstrate that there is no commingling of licensed material and the pickling acid. While the NRC did open an Unresolved Item in 2011 regarding the potential commingling of acid (Reference 2), the data provided in the B&W response (Reference 3) resulted in the NRC's ultimate concurrence that in fact commingling was not credible (Reference 4), thus the criteria of 10 CFR 70.61 would not apply. As a point of reference, it should be noted that since the dates of the mentioned letters, the company has reorganized and changed its company name from Babcock & Wilcox (B&W) to BWXT Nuclear Operations Group - Lynchburg (BWXT NOG-L).

Based on our previous determination, BWXT NOG-L requests your concurrence that the new pickling facility should be considered an extension of the current operations, the pickling acid should not be considered to be licensed material or derived from license material, and a license amendment is not required for the new facility.

Please find in the enclosures relevant technical reports and communication with the NRC regarding the current pickling operations.

If you have questions or require additional information, please contact Chris Terry, Manager, Licensing and Safety Analysis, at [cterry@bwxt.com](mailto:cterry@bwxt.com) or (434) 522-5202.

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Sincerely,

A handwritten signature in black ink, appearing to read "B. Joel Burch". The signature is fluid and cursive, with a large initial 'B'.

B. Joel Burch

Vice President and General Manager

BWX Technologies Nuclear Operations Group, Inc., Lynchburg

Enclosures

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**ENCLOSURE 1**

**Letter dated January 30, 2012, M.D. Sykes (NRC)  
to R.P. Cochran (B&W NOG), NRC Inspection  
report 70-27/2011-005 and Notice of Violation**

**All portions of this enclosure are  
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