

From: [Ramsey, Kevin](#)
To: [Morie, Amaryl A](#); [Brown, Nicholas W](#); [Marcano, Jonathan](#); [Smith, April](#)
Subject: Final Summary of 3/30 call w/NFS re: GL 2015-01
Date: Tuesday, April 04, 2017 10:53:00 AM

On March 30, 2017, the following individuals participated in a call regarding the status of response actions for questions concerning Generic Letter 2015-01, "Treatment of Natural Phenomena Hazards in Fuel Cycle Facilities":

Kevin Ramsey, NRC
Jonathan Marcano, NRC
April Smith, NRC

Amaryl Morie, NFS
Nick Brown, NFS
Blaine Rice, NFS
Bob Mauer, NFS
Ashley Morris, NFS

NFS reported that its contractor (Frank Hand, Atkins) has completed 90% of the seismic calculations and completed 75% of the written reports. All equipment evaluated so far has passed the screening criteria. The contractor reports that the piping appears to meet the minimum requirements, but recommended improvements will be provided for NFS consideration. NRC asked if NFS would submit the entire contractor report or just the results. NFS said it intends to submit the entire contractor report.

NFS provided the following outline of how it intends to respond to the request for supplemental information:

1. Bounding accidents – The question of multiple accidents occurring at the same time in different areas is driven by piping failures. The evaluation indicates that piping will survive a seismic event. Therefore, it doesn't appear that accidents in other areas would occur.
2. IROFS and management measures – The response will reference the seismic calculations. In addition, NFS noted that Engineering is assigned an investigation in the NFS CAP program to evaluate the change control process to consider the impact of changes on the seismic evaluation.
3. Slow leaks – The response will refer to the seismic calculations.
4. Emergency Response – NFS confirmed that the Emergency Response procedure isn't an IROFS. However, there is an IROFS to close essential valves that is implemented in a procedure.
5. Margin of dose estimate – NFS stated that it is no longer projecting a large spill because the seismic evaluation is showing that many components survive a seismic event. However, it will retain the dose estimate to show that a large spill is a low consequence event.
6. Seismic analysis of components – The seismic analysis will be provided.
7. Initiating event frequency – NFS will base the frequency on the seismic analysis.
8. Column leak rate - The response will reference the seismic calculations.
9. Piping leak rate - The response will reference the seismic calculations.
10. Gloveboxes tipping over – The analysis shows that gloveboxes will remain upright.
11. Estimated depth of liquid on the floor – With the analysis showing that components

survive a seismic event, NFS no longer projecting a large spill of liquid.

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