

September 14, 2017

Mr. John J. Miller, CHP
Radiation Safety
and Regulatory Compliance Officer
International Isotopes Inc.
4137 Commerce Circle
Idaho Falls, Idaho 83401

SUBJECT: CLOSURE OF GENERIC LETTER 2015-01, "TREATMENT OF NATURAL PHENOMENA HAZARDS IN FUEL CYCLE FACILITIES," FOR THE INTERNATIONAL ISOTOPES FLUORINE PRODUCTS, INC. FLUORINE EXTRACTION PROCESS AND DEPLETED URANIUM DECONVERSION PLANT

Dear Mr. Miller:

On June 22, 2015, the U.S. Nuclear Regulatory Commission (NRC) issued Generic Letter (GL) 2015-01, "Treatment of Natural Phenomena Hazards in Fuel Cycle Facilities," (Agencywide Documents Access and Management System [ADAMS] Accession Number ML14328A029). The GL-2015-01 was issued for two purposes: (1) to request that addressees submit information to demonstrate compliance with regulatory requirements and applicable license conditions regarding the treatment of natural phenomena events in the facilities' integrated safety analysis (ISA); and (2) to determine if additional NRC regulatory action is necessary to ensure that licensees comply with their licensing basis and existing NRC regulations.

By letter dated October 23, 2015, International Isotopes Fluorine Products, Inc. (IIFP), a subsidiary of International Isotopes, Inc. responded to GL-2015-01 (ADAMS Accession Number ML15313A047) for its planned fluorine extraction process and depleted uranium deconversion plant. During the initial licensing review, the NRC staff completed its evaluation of IIFP's assessment of natural phenomena hazards (NPH) for this plant, and the results were documented in NUREG-2116, "Safety Evaluation Report for the International Isotopes Fluorine Products, Inc. Fluorine Extraction Process and Depleted Uranium Deconversion Plant in Lea County, New Mexico," (ADAMS Accession Number ML12145A504). The NRC staff has determined that IIFP's response to GL-2015-01 is consistent with IIFP's previously evaluated NPH assessments.

Once construction begins at the facility, the NRC staff will perform inspections of the construction activities to ensure that the facility is capable of withstanding credible natural phenomena events. The fluorine extraction process and depleted uranium deconversion plant will be inspected in accordance with Inspection Manual Chapter (IMC) 2694, "Fuel Cycle Facility Construction and Operational Readiness Review Inspection Program," (ADAMS Accession Number ML17069A203). IMC 2694 has been updated to define the construction inspection program for all fuel cycle facilities constructing per a license issued under Title 10 of the Code of Federal Regulations (10 CFR) Part 70, "Domestic Licensing of Special Nuclear Material" or

under 10 CFR Part 40, "Domestic Licensing of Source Material." A sample of the inspection activities includes verification of the installation and construction of items relied on for safety related to NPH accident sequences. The results of the inspections will be documented in quarterly inspection reports.

The NRC staff has concluded that IIFP has performed appropriate evaluations of NPH at the fluorine extraction process and depleted uranium deconversion plant based on the consistency of IIFP's response to GL-2015-01 with IIFP's previous NPH assessment. As a result, GL-2015-01 is considered closed and no further information or action is requested.

In accordance with 10 CFR 2.390 of the NRC's "Agency Rules of Practice and Procedure," a copy of this letter will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records System component of the NRC's ADAMS. ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>.

Sincerely,

\RA BSmith for

Craig G. Erlanger, Director
Division of Fuel Cycle Safety, Safeguards,
and Environmental Review
Office of Nuclear Material Safety
and Safeguards

Docket No. 40-9086

J. Miller

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DATED: September 14, 2017

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