

NOTE TO: File

FROM: Christopher Ryder, Project Manager
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Division of Fuel Cycle Safety, Safeguards
and Environmental Review
Office of Nuclear Material Safety
and Safeguards

SUBJECT: Conference Call on August 9, 2017: Discussion of Preliminary Response to
Requests for Additional Information — Chemical Process Safety

DATE

Wednesday, August 9, 2017

PARTICIPANTS

<u>NRC</u>	<u>Westinghouse</u>
Marilyn Diaz Maldonado ^(a)	Nancy Parr ^(c)
Christopher Ryder ^(b)	

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- Technical Reviewer, Fuel Manufacturing Branch (FMB), Safeguards, and Environmental Review (FCSE), Office of Nuclear Material Safety and Safeguards (NMSS)
 - Licensing Project Manager, Fuel Manufacturing Branch, FCSE, NMSS
 - Licensing Manager

BACKGROUND

By letter dated December 17, 2014, Westinghouse submitted an application to renewal special nuclear material (SNM) license SNM-1107 (Ref. **Error! Reference source not found.**). Chapter 7, Chemical Process Safety was reviewed. The staff at the U.S. Nuclear Regulatory Commission (NRC) had requests for additional information (RAIs) by letters dated June 23, 2016 (Ref. **Error! Reference source not found.**), and November 23, 2016 (Ref. **Error! Reference source not found.**). Westinghouse submitted preliminary responses to determine the extent to which the expectations of the NRC staff would be met. The purpose of the subject conference call was to discuss instances where the NRC staff expectations were not met.

DISCUSSION

Letter Dated June 23, 2016, RAI 58.

The RAIs were based on the 10 CFR 70.62(c) requirement. 10 CFR 70.62(c), specifically (iii) and (iv) discusses facility hazards and process deviations that could affect the safety of licensed materials. This RAI requests information regarding the facility hazards associated to the HF spiking tank. Westinghouse must demonstrate that they considered the leak of the pipe or other credible scenarios inside the enclosed area as well as the surrounding area. Westinghouse stated that a Process Hazard Analysis had been performed, serving as the technical basis for

concluding that no safety concerns existed. Westinghouse stated that they would revise the preliminary response accordingly for NRC to review and provide the analysis demonstrating no safety concern as a result of any chemical or facility hazards.

Letter dated November 23, 2016, RAI 51.

Westinghouse was unclear if the NRC staff was questioning the method for analyzing the main scrubber or the application of the method. The RAI would seem to have been addressed by enforcement at NRC Region II, not again during licensing at NRC Headquarters. The NRC staff explained that though the RAI is relevant to the May 2016 event, the RAI is addressing the criteria for selecting analysis methods. During a previous site visit for chemical safety audits, the NRC staff learned of the information that is needed to continue with the review of the license renewal application. The NRC staff seeks information about the criteria for selecting analysis methods, that an interdisciplinary team is used to evaluate hazards, and that results are communicated accordingly. With this explanation, Westinghouse agreed to revise the preliminary response as such.

Letter Dated June 23, 2016, RAI 53.

The NRC staff was unclear about the extent to which training and other training is administered. Westinghouse explained that training is performed according to procedures. Site access training is given to new employees as classroom study, then annually as computer-based. When procedures are revised, operators must pass computer-based training to perform their activities. Westinghouse agreed to enhance the response as such.

Letter Dated June 23, 2016, RAI 56.

Referring to the chemical safety audits, the NRC staff understands that Westinghouse considers all pathways of chemical exposures. The NRC staff expects the technical basis for claiming that the inhalation pathway is bounding. Westinghouse stated that they would reconsider the response. From the perspective of the NRC staff, the response appears to be a "bounding" lacking a technical basis.

Letter Dated June 23, 2016, RAI 57.

There exist an apparent discrepancy in the ISA because a table in the ISA suggest that only inhalation is evaluated. Additionally, the process safety information provided in the ISA Summary discussing the ADU Vaporizer System makes a statement about "prevalent hazard" being inhalation. This statement has no supporting argument, Westinghouse agreed to evaluate the preliminary response to the RAI and, in during the 2018 update, the ISA.

CLOSING REMARKS

Westinghouse stated that they will revise the responses.

References

1. Letter from N. Parr, Westinghouse Electric Company, "SNM-1107 License Renewal Supplement", December 17, 2014. ADAMS accession number ML14352A111.

2. Letter from C. Ryder, U.S. Nuclear Regulatory Commission, "Request For Additional Information: Renewal Of Special Nuclear Materials License SNM-1107 (Cost Activity Code: L33317)", June 23, 2016. ADAMS accession number ML16141A734.
3. Letter to N. Parr, Westinghouse Electric Company LLC, "Request For Additional Information: Renewal Of Special Nuclear Materials License SNM-1107", November 23, 2016. ADAMS accession number ML16300A159.