

21G-18-0001
GOV-01-55-04
ACF-18-0001

January 3, 2018

Director, Office of Nuclear Material Safety and Safeguards
U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555

Reference: Docket No. 70-143; SNM-124

Subject: Submittal of Internally Authorized Changes (IACs) for Calendar Year 2017

In accordance with 10 CFR 70.72(d)(2), Nuclear Fuel Services, Inc. (NFS), hereby submits a summary of the two (2) Internally Authorized Changes (IACs) that were completed at NFS during Calendar Year 2017.

The *Summary of IACs Completed During Calendar Year 2017* (Attachment 1) includes for each IAC: IAC number, IAC Title and Reason for IAC, and the Date the IAC was Released for Operation. The "Reason for IAC" includes a brief description of why the change was made.

In accordance with Section 11.1.1, paragraph 1, of SNM-124, each IAC was reviewed by NFS safety disciplines, and the questions from 10 CFR 70.72(c)(1 - 4) were answered using the documentation format shown in Attachment 2. If the answer was "Yes" to any of the questions, then NRC approval was required. Each IAC was also approved by the Safety and Safeguards Review Council (SSRC). All IACs included in Attachment 1 did not require pre-approval under 10 CFR 70.72 because responses to each question from 10 CFR 70.72(c)(1 - 4) were "No."

The Integrated Safety Analysis (ISA) Summaries that reflect changes to existing NFS operations were revised and are being submitted under separate cover letter in accordance with 10 CFR 70.72(d)(3). To assist in your review of the revised ISA Summaries, Attachment 1 groups the IACs by the ISA Summary that relates to each process change.

If you or your staff have any questions, require additional information, or wish to discuss this further, please contact me at (423) 743-1705, or Mr. David Hopson, Senior Regulatory Advisor, at (423) 735-5021. Please reference our unique document identification number (21G-18-0001) in any correspondence concerning this letter.

Sincerely,

NUCLEAR FUEL SERVICES, INC.



Richard J. Freudenberger, Director
Safety and Safeguards

DRH/pdj

Attachment 1: Summary of Internally Authorized Changes (IACs) Completed During
Calendar Year 2017

Attachment 2: License Amendment Evaluation Form FM-NFS-HS-A-67-A

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ATTACHMENT 1

**Summary of Internally Authorized Changes (IACs)
Completed During Calendar Year 2017**

1 page to follow

**Summary of Internally Authorized Changes (IACs)
 Completed During Calendar Year 2017**

<p>The following changes involved the decommissioning of the BLEU Complex which began in 2016 and was completed in 2017. BLEU Complex ISA Summaries for the Uranyl Nitrate Building (UNB) and the Oxide Conversion and Effluent Processing Buildings (OCB/EPB) are now considered obsolete.</p>		
IAC No.	IAC Title/Description of Change/ Reason for Change	Date IAC Released for Operation
892	BLEU Complex D&D – Buildings 510/520/530/540/550 demolition and associated equipment removal – no longer needed (end of Areva/NFS contract)	05/12/16

<p>The following changes were related to Decommissioning or Non-Nuclear activities and, therefore, do not relate to an ISA Summary.</p>		
IAC No.	IAC Title/Description of Change/ Reason for Change	Date IAC Released for Operation
888	Demolition and Removal of Ground Water Treatment Facility (GWTF) – Building 335 and Associated GWTF Process Equipment – no longer needed to support NFS' D&D activities – the equipment has been removed and the building has been demolished.	09/07/17

ATTACHMENT 2

License Amendment Evaluation Form FM-NFS-HS-A-67-A

3 pages to follow

FM-NFS-HS-A-67-A, Revision 6
 05/23/17

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 Attachment A

SAFETY AND REGULATORY REVIEW ROUTING FORM
 (Part I, Front Side)

FM-NFS-HS-A-67-A, Rev. 6, NFS-HS-A-67
 Authorization of Form (initials): TRD

Revision Date: 05/23/2017

LIC-11

SAFETY & REGULATORY REVIEW ROUTING FORM (Part I)

Date In: / /	Date Out With Comments: / /
Date Approved: / /	Date Returned: / /

Circle Review Type → Procedure - LOA - CA/CCP - FWP - WR - GH-44 Att. A - New Feed Material - Other

Number: Section: Revision:

Title/Subject:

Originator: Phone No.: ECR#:

SSRC Comments from Triennial Reviews of Procedures: Attached / None / NA

Safety Discipline Review Questions
 (Place comments, if needed, on the back of this form)

	Ind.	Rad.	Env.	Crit.*	ISA*	Fire	Other*
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A. Is the attached document related to an existing Internally Authorized Change (IAC)?
 If yes, enter IAC Number. If no, is an IAC required? (Be prepared to justify your answer)

	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N
1. The change may significantly affect radiological or criticality safety.							
2. The change may significantly affect environmental, industrial, or fire safety.	Y/N		Y/N		Y/N	Y/N	Y/N
3. The change results in non-compliance with an existing license condition.	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N
4. The change results in facilities, equipment, procedures, or safety controls substantially different from those currently in use.	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N
5. The change requires revision of the applicable safety or environmental basis.	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N
6. The change results in a violation of currently established criticality, industrial, fire, radiological, or environmental safety principles, or established methods of maintaining radiation exposures ALARA.	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N
7. The change involves decommissioning-related activities. If yes, Env. Safety must attach a completed Form FM-NFS-GH-44-H.		Y/N	Y/N				

B. Is a license document change required? (Be prepared to justify your answer)

1. The change requires a modification to a license condition or to SNM-124. If yes, provide license pages with edits to Licensing to support completion of Part II of this form (to determine the type of license change required).	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N
2. The change results in the creation of a new type of accident sequence that, unless mitigated or prevented, would result in high or intermediate consequences (exceed the performance requirements of 10 CFR 70.61) and has not previously been described in the ISA summary.				Y/N	Y/N		
3. The change results in the usage of new processes, technologies, or controls for which NFS has no prior experience.	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N
4. The change results in the removal, without at least an equivalent replacement of the safety function, of an item relied on for safety that is listed in the ISA summary and is necessary for compliance with the performance requirements of 10 CFR 70.61.				Y/N	Y/N		
5. The change results in the alteration of any item relied on for safety, listed in the ISA summary, that is the sole item preventing or mitigating an accident sequence that exceeds the performance requirements in 10 CFR 70.61.				Y/N	Y/N		
6. The change requires an NRC-approved Decommissioning Plan.				Y/N			

C. Is a safety basis document available? (Examples include ACE, FHA, FRE, ISA, PHA, NCSE, Env. Rpt., Emerg. Plan, TDEC Permit, etc.)

1. If yes, has a revision already been completed that addresses this change?	Y/NNA	Y/NNA	Y/NNA	Y/NNA	Y/NNA	Y/NNA	Y/NNA
2. If no to #1 of this section, is a revision needed prior to implementing the change?	Y/NNA	Y/NNA	Y/NNA	Y/NNA	Y/NNA	Y/NNA	Y/NNA
3. If no safety basis document is available, is one needed?	Y/NNA	Y/NNA	Y/NNA	Y/NNA	Y/NNA	Y/NNA	Y/NNA
4. The change may affect criticality detector system coverage or audibility of criticality alarms or fire alarms.	Y/NNA			Y/NNA		Y/NNA	Y/NNA
5. Does the change require a walkdown?				Y/NNA	Y/NNA		

D. Is a current IROFS/SRE list available? (circle one: Yes / No)

1. If yes, is a revision needed prior to implementing the change?		Y/NNA	Y/NNA
2. If no, is a new list needed prior to implementing the change?		Y/NNA	Y/NNA

TWMTS Engineer/Manager	← Initials →						
	← Concurrence →						

*Must review all changes involving SNM equipment/processes
 †Other – (EP, NDA, ES, Licensing)
 RETURN COMPLETED FORM TO SAFETY DEPARTMENT ADMINISTRATIVE ASSISTANT
 NOTE: Knowingly or willfully falsifying or concealing a material fact on this form, or making false, fictitious or fraudulent statements or representations herein could constitute a felony punishable under Federal Statutes.
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 Attachment A
 SAFETY AND REGULATORY REVIEW ROUTING FORM
 (Part I, Back Side)

Safety & Regulatory Management Review Questions (Place comments, if needed, on the bottom of this form)	SSRC Safety	SSRC Chair
1. Have the Safety and Other reviewers completed and initialed the front of the form, and entered on the back of the form their comments? Also, has the TWMTS review been completed?	Y/NA	Y/NA
2. SSRC comments from Procedure reviews have been resolved?		Y/N/NA
3. Add Procedure to SSRC review list? (For new procedures only)		Y/N/NA
4. Does the change have a negative impact on NDA measurements or measurement systems? (If yes, notify the change originator and NDA.)	Y/N/NA	Y/N/NA
5. IAC is required? (If yes, send copy of form to Originator to initiate IAC process) IAC Number	Y/N	Y/N
6. IAC Final Installation Reviews are complete? (If no, withhold approval of LOA or SOP until reviews are complete or the IAC release is being tracked by an ORR.)		Y/N/NA
7. License document change is required? (If yes, verify Part II is attached, and send copy of form to Licensing Mgr.)	Y/N	Y/N°
NOTE FOR QUESTIONS 8 AND 9: If question C.2, D.1 or D.2 is answered "yes" ensure the safety basis document (question 8) and/or the IROFS/SRE list (question 9) is generated/revised prior to implementation of the change for procedures and LOAs.		
8. Generate/revise safety basis document? (If yes, send copy of form to appropriate Safety Mgr.)	Y/N	Y/N
9. Generate/revise IROFS/SRE list? (If yes, send copy of form to ISA Manager)	Y/N	Y/N
°Chairman acts on behalf of SSRC, provided no IAC is required.		Initials →
Comments / Basis (Attach additional Sheets, if needed)		

TWMTS Engineer/Manager

Industrial Safety

Radiological Safety

Environmental Safety

Criticality Safety

Safety Analysis (ISA)

	*Impact to Safety Basis ?	Initials	Screening Guideline *Circle the applicable	Comments
Chem	Y / N		1 2 3 4 5 6 7	
Rad	Y / N		1 2 3 4 5 6 7	
Fire	Y / N		1 2 3 4 5 6 7	

*If any are answered "No" by an ISA Team Leader, circle criteria item number(s) that apply from Attachment B in the Screening Guideline column.

Fire Protection

Other

SSRC Safety

SSRC Chairman

NOTE: Maintain Record (Form) until Termination of License SNM-124

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 Attachment A
SAFETY AND REGULATORY REVIEW ROUTING FORM
 (Part II)

FM-NFS-HS-A-67-A, Rev. 6, NFS-HS-A-67
 Authorization of Form (initials):

Revision Date: 05/23/2017

LIC-11

SAFETY & REGULATORY REVIEW ROUTING FORM (Part II)

License Document Change (Administrative or Amendment)

As specified in SNM-124 License Condition S-2, the following are examples of administrative changes that generally do not require prior NRC approval:

- modifications to facility and process descriptions
- enhancements or clarifications of text
- grammatical corrections
- reformatting of text.

If the following questions are answered "no" the license document change is administrative. Give justification in the provided space and/or attach evidence. (e.g., redlined safety basis documents, procedure mark-ups, etc.)	Licensing
If any of the questions are answered "yes" the license document change requires a license amendment and approval from the NRC prior to implementation of the change. 1. The change decreases the level of effectiveness of the design basis as described in the License Application. Justification: 	Y / N
2. The change results in a departure from the methods of evaluation described in the License Application used in establishing the design basis. Justification: 	Y / N
3. The change results in a degradation of safety. Justification: 	Y / N
4. The change affects compliance with applicable regulatory requirements. Justification: 	Y / N
5. The change conflicts with an existing license condition. Justification: 	Y / N

Checklist for License Document Changes (To be completed by Licensing)	Licensing Initials	
	Administrative	Amendment
The license page(s) has been modified.		
The license page(s) has been approved by the SSRC.		
The licensing Sharepoint Site and eB have been updated to reflect the license document change.		
A PIRCS entry, with a due date no later than 6 months from the time of implementation of the change, has been made for submittal of the license document page(s) to the NRC. (PIRCS ID)		

NOTE: Knowingly or willfully falsifying or concealing a material fact on this form, or making false, fictitious or fraudulent statements or representations herein could constitute a felony punishable under Federal Statutes.
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