



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

March 28, 2018

Mr. Chris Terry, Manager  
Licensing & Safety Analysis  
BWXT Nuclear Operations Group, Inc.  
P.O. Box 785  
Lynchburg, VA 24505-0785

SUBJECT: BWXT NUCLEAR OPERATIONS GROUP, INC. – PHYSICAL PROTECTION  
PLAN REVISIONS 21 AND 22 (COST ACTIVITY CODES L33440 and L33447)

Dear Mr. Terry:

This refers to your letter 17-026, dated April 14, 2017 (Agencywide Documents Access and Management Access System [ADAMS] Accession Number ML17296A147) as well as letter 17-039, dated June 30, 2017 (ADAMS ML17194A719), which submitted Revisions 21 and 22, respectively, of the site Physical Protection Plan in accordance with the requirements of Title 10 of the *Code of Federal Regulations* (10 CFR) Paragraph 70.32(e) and 10 CFR Section 70.34. Letter 17-039 also submitted Revision 6 of the site Safeguards Contingency Plan in accordance with the requirements of 10 CFR 70.32(e).

The U.S. Nuclear Regulatory Commission (NRC) has completed its review of the Plans.

Enclosure 1 of letter 17-026 provided a list of the proposed changes for NRC review which have not been incorporated into Revision 21 of the Plan. They include proposed changes to sections 16.12 and 16.14 plus 6.3.1 regarding the fatigue management program and operation of the Entry/Exit Control Point.

The proposed changes for section 16.12 and 16.14 (fatigue) which required NRC approval were found to be acceptable. BWXT should incorporate them into an upcoming revision of the Plan.

The minor changes in Revision 21 were found to be properly submitted in accordance with 10 CFR 70.32(e) and are acceptable.

The proposed changes to section 6.3.1 (EECP operation) which required NRC approval were ultimately withdrawn by BWXT via email on December 7, 2017(ADAMS ML17342A142).

The proposed changes which required NRC approval for section 6.10.4 in Revision 22 as a result of the completion of voluntary enhancements, as well as the proposed Appendix B regarding the revised protection strategy were found to be acceptable. BWXT should incorporate them into an upcoming revision of the Plan.

The Letter transmitted contains  
Security-Related Information,  
When separated from the Enclosure,  
this Letter is decontrolled.

The minor changes in Revision 22 were found to be properly submitted in accordance with 10 CFR 70.32(e) and are acceptable.

Cost Activity Codes L33440 and L33447 are CLOSED.

The minor changes in Revision 6 of the site Safeguards Contingency Plan were found to be properly submitted in accordance with 10 CFR 70.32(e) and are acceptable. Conditions SG-6.1 and 6.3 of Materials License SNM-42 will be updated in a future amendment.

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 component of NRC's ADAMS. ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>. The enclosure will not be publically available.

If you have any questions, feel free to contact me at (301) 415-7119, or via e-mail at [Merritt.Baker@nrc.gov](mailto:Merritt.Baker@nrc.gov).

Sincerely,

**\RA\**

Merritt N. Baker, Senior Project Manager  
Fuel Manufacturing Branch  
Division of Fuel Cycle Safety, Safeguards,  
and Environmental Review  
Office of Nuclear Material Safety  
and Safeguards

Docket No. 70-27  
License No. SNM-42

Enclosure: Safety Evaluation Report

CC: Jason Presley, BWXT

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PLAN REVISIONS 21 AND 22 (COST ACTIVITY CODES L33440 and L33447)

DATED: March 28, 2018

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**ADAMS Accession Number: ML18078B050**

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<b>DATE</b>	1/23/18	1/25/18	3/28/18	3/28/18

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