PDR

UNC RECOVERY SYSTEMS

70-820

Unc

Division of United Nuclear Corporation
A UNC RESOURCES Company

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October 16, 1979 CEB 79 -195

U. S. Nuclear Regulatory Commission Robert L. Stevenson Uranium Process Licensing Section Uranium Fuel Licensing Branch Division of Fuel Cycle and Material Safety Washington, D.C. 20555

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Dear Mr. Stevenson:

You will find our formal reply to your July 30, 1979 comments and questions concerning our March 1979
Amendment of Section 200 of License SNM - 777 attached to this letter. You will also find five copies of the revised amendment enclosed for your convenience.

Sincerol France

C. E. Bowers General Manager

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ATTACHMENT I

The following constitutes our formal reply to your questions and comments concerning our Section 200, License Amendment Application, pages dated March 1, 1979. The paragraph numbers are keyed to the comments attached to your letter of July 30, 1979.

1. Subsection 201, Division Organization

The text has been changed to better describe the division organization.

2. Figures 201 - I and 201 - II

- (a) The General Manager depicted in Figure 201 I is the Recovery Systems Division General Manager and Figure 201 - I now reflects this more clearly.
- (b) The intent of the NIS section (future) within the Fuel Recovery Organization was to depict this facility's commitment to provide adequate NIS coverage to that subdivision. The NIS entity has been removed to eliminate the possibility of operational line authority over that section by Fuel Recovery management. The remaining "future blocks of uncertain purpose" depict planned nonnuclear related business ventures and a compliance entity which will expand as the need arises. These future additions to the Division were included for information and to depict Fuel Recovery's placement within the future Division organization.

3. Subsection 202, Nuclear and Industrial Safety Department

- (a) No change was made. The present NIS organization meets the local criteria to be designated a "Department". It is headed by a manager; prepares, submits and manages a budget, and operates as a distinct entity within the Quality Assurance organization.
- (b) Paragraph 2, Responsibility
 - The missing text was inserted.
 - II. The provision for "one-over one" review was inserted.

4. Subsection 205, Page 1 of 2 pages

The issue date has been changed.

5. Subsection 206, Paragraph 2.2

- (a) Paragraph 206.2.2 now clearly states when separate assessments are necessary.
- (b) The reference to technical qualifications was changed to 202.3.

6. Subsection 206, Paragraph 2.3

The paragraph remains unchanged. All the evaluations or reviews described in paragraph 206.2.2 require the approval of the Manager, NIS.

7. Subsection 206

Paragraphs 206.3 and .4 were reinstated with minor changes.

8. Subsection 207, Paragraph 1 - Inspection

The individual items will be addressed at least once each quarter.