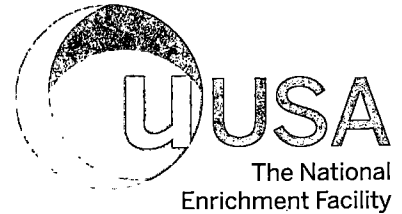


OCT 24 2019

LES-19-147-NRC



Attn: Document Control Desk
Director, Division of Fuel Cycle Safety, Safeguards & Environmental Review
Office of Nuclear Material Safety and Safeguards
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Louisiana Energy Services, LLC
NRC Docket No. 70-3103

Subject: Proposal for Building a Smarter Fuel Cycle Inspection Program

Reference: LES-19-133-NRC, Letter from UUSA to NRC, UUSA comments on Building a Smarter Fuel Cycle Inspection Program, September 5, 2019

UUSA has participated in the public meetings the NRC has held regarding the subject initiative undertaken by the NRC and will continue to support this effort. UUSA previously submitted comments in the Referenced letter. UUSA recently presented a proposal in a Public Meeting and herewith submits the proposal in Enclosure 1.

Should there be any questions regarding this submittal, please contact Paul Lorskulsint, UUSA Deputy Compliance Manager, at 575-394-5176.

Respectfully,

A handwritten signature in black ink that reads 'Stephen R. Cowne'.

Stephen R. Cowne
Chief Nuclear Officer and Compliance Manager

Enclosure 1. UUSA Proposal on Building a Smarter Fuel Cycle Inspection Program

NM5520
NM55

CC: email

Kevin Ramsey, Project Manager - UUSA
U.S. Nuclear Regulatory Commission
Kevin.Ramsey@NRC.gov

Jacob Zimmerman, Fuel Facility Licensing Branch Chief
U.S. Nuclear Regulatory Commission
Office of Nuclear Material Safety and Safeguards
Jacob.Zimmerman@NRC.gov

Robert Williams, Region II Projects Branch I Chief
U.S. Nuclear Regulatory Commission
Robert.Williams@nrc.gov

Margie Kotzalas, Licensing and Oversight Branch Chief
U.S. Nuclear Regulatory Commission
Office of Nuclear Material Safety and Safeguards
Margie.Kotzalas@nrc.gov

ENCLOSURE 1
UUSA Proposal on Building a Smarter Fuel Cycle Inspection Program

A Corrective Action Program is capable of identifying issues which far exceed regulatory requirements. UUSA identifies issues completely, accurately, and in a timely manner. In accordance with our program, issues are identified and evaluated to ensure that resolutions address causes and extent of condition. Our facility takes effective corrective actions to address issues in a timely manner commensurate with safety significance. UUSA periodically analyzes information from the corrective action program and other assessments to identify programmatic issues and common causes.

An effective Corrective Action Program results in reducing the need for inspections. Issues are identified, evaluated and corrected in a timely manner. Records are retrievable by the NRC for enforcement action, if necessary. NRC inspection may identify failure to place issues in the corrective action program.

UUSA does not have any fundamental disagreements with NEI Proposal 1¹, NEI Proposal 2² or NRC Options 1 and 2³. The details associated with NRC Option 1 need clarification UUSA is interested in the measurements associated with NEI Proposal 2 and looks forward to future discussions on these proposals. UUSA's proposal is intended to overlay and coexist with NRC Option 2.

The following table is based on NRC Option 2 which was provided by the NRC at the October 17th public meeting⁴. Markups and change bars were utilized to show the proposed additions. The UUSA proposal creates comprehensive inspection activities to be performed triennially for 1) Fire Protection, 2) Radiation Protection, 3) Effluent Control & Environmental, 4) Transportation and 5) Emergency Preparedness. Additionally, the proposal removes the annual Modifications Inspection and replaces with a triennial Comprehensive Modifications Inspection. Additionally, a required Corrective Action Program Inspection is proposed triennially. It is expected that the Corrective Action Program and Comprehensive Plant Modifications inspections would each be performed in sequential years instead of the NRC proposed inspection regime as long as a licensee has committed to a corrective action program that requires the licensee to identify non-regulatory required issues.

¹ ML19176A534

² Letter from NEI to NRC, Industry Proposal 2 - Smarter Program for Fuel Cycle Facilities, October 15, 2019

³ ML19254A588

⁴ ML19288A317

Proposed Modification to NRC Option 2

| | | Category I Fuel Facility | | Category III Fuel Fabrication Facility | | Uranium Conversion Facility | | Gas Centrifuge Facility | |
|-----------------------------------|--|--------------------------|--|--|--|-----------------------------|--|-------------------------|--|
| Function/ Program Areas | Procedure or Procedure Suite | Inspection Frequency | Estimated Resources per IP (hrs) | Inspection Frequency | Estimated Resources per IP (hrs) | Inspection Frequency | Estimated Resources per IP (hrs) | Inspection Frequency | Estimated Resources per IP (hrs) |
| SAFETY OPERATIONS | | | | | | | | | |
| Plant Operations | 88020 (OPR) | Biennial | 30 | Annual | 90 | Annual | 90 | Annual | 90 |
| | 88135 (Resident Inspection Program) | Annual | 797 | - | - | - | - | - | - |
| Criticality Safety | 88015 | Annual | 180 | Annual | 90 | - | - | Annual | 90 |
| Fire Protection ** | 8805X | Biennial | 30 | Biennial | 60 | Biennial | 60 | Biennial | 60 |
| SAFEGUARDS | | | | | | | | | |
| MC&A | Procedures as in IMC 2683 | Annual | 120 | Biennial | 60 | - | - | Biennial | 60 |
| MC&A (observation) | Procedures as in IMC 2683 | Triennial | 30 | Triennial | 30 | | | | 30 |
| RADIOLOGICAL CONTROLS | | | | | | | | | |
| Radiation Protection ** | 88030 (RP) | Annual | 30 | Annual | 30 | Annual | 30 | Annual | 30 |
| Environmental Protection ** | 88045 (Effluent Control and Env.) | Annual | 30 | Annual | 30 | Annual | 30 | Annual | 30 |
| Transportation ** | 86740 (T) | Triennial | 30 | Triennial | 30 | Triennial | 30 | Triennial | 30 |
| FACILITY SUPPORT | | | | | | | | | |
| Emergency Preparedness ** | 88050 (EP) | Biennial | 30 | Biennial | 30 | Biennial | 30 | Biennial | 30 |
| | 88051 (Exercise Observation) | Biennial | 48 | Biennial | 48 | Biennial | 48 | Biennial | 48 |

| | | Category I Fuel Facility | | Category III Fuel Fabrication Facility | | Uranium Conversion Facility | | Gas Centrifuge Facility | |
|--|--|--|--|--|--|--|--|--|--|
| Function/ Program Areas | Procedure or Procedure Suite | Inspection Frequency | Estimated Resources per IP (hrs) | Inspection Frequency | Estimated Resources per IP (hrs) | Inspection Frequency | Estimated Resources per IP (hrs) | Inspection Frequency | Estimated Resources per IP (hrs) |
| Plant Modifications (Annual) ** | 88070 | Annual unless 88072 is performed | 30 | Annual unless 88072 is performed | 30 | Annual unless 88072 is performed | 30 | Annual unless 88072 is performed | 30 |
| Plant Modifications (Triennial) | 88072 | Triennial | 90 | Triennial | 90 | Triennial | 90 | Triennial | 90 |
| <u>ACCREDITED CORRECTIVE ACTION PROGRAM</u> (IF LICENSEE HAS VOLUNTARILY IMPLEMENTED AN ACCREDITED CAP) | | | | | | | | | |
| <u>Corrective Action Program</u> | <u>88161 (CAP)</u> | <u>Triennial</u> | <u>90</u> | <u>Triennial</u> | <u>90</u> | <u>Triennial</u> | <u>90</u> | <u>Triennial</u> | <u>90</u> |
| <u>Compre- hensive</u> | <u>Fire Protection (8805X)</u> | <u>Triennial</u> | <u>45</u> | <u>Triennial</u> | <u>45</u> | <u>Triennial</u> | <u>45</u> | <u>Triennial</u> | <u>45</u> |
| | <u>88030 (RP)</u> | <u>Triennial</u> | <u>30</u> | <u>Triennial</u> | <u>30</u> | <u>Triennial</u> | <u>30</u> | <u>Triennial</u> | <u>30</u> |
| | <u>88045 (Effluent Control and Env.)</u> | <u>Triennial</u> | <u>30</u> | <u>Triennial</u> | <u>30</u> | <u>Triennial</u> | <u>30</u> | <u>Triennial</u> | <u>30</u> |
| | <u>86740 (Trans- portation)</u> | <u>Triennial</u> | <u>15</u> | <u>Triennial</u> | <u>15</u> | <u>Triennial</u> | <u>15</u> | <u>Triennial</u> | <u>15</u> |
| | <u>88050 (Emergency Prep)</u> | <u>Triennial</u> | <u>30</u> | <u>Triennial</u> | <u>30</u> | <u>Triennial</u> | <u>30</u> | <u>Triennial</u> | <u>30</u> |
| | <u>Plant Modifications (88070)</u> | - | <u>0</u> | - | <u>0</u> | - | <u>0</u> | - | <u>0</u> |

** Unless inspections are performed under an accredited CAP inspection.