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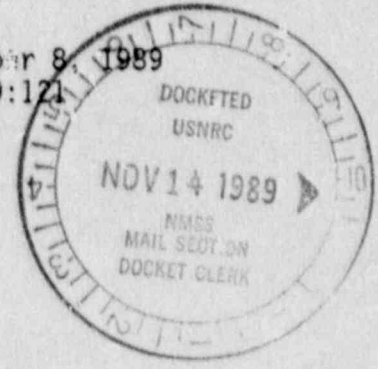
ADVANCED NUCLEAR FUELS CORPORATION

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SAFETY, SECURITY, AND LICENSING



November 8, 1989
CWM:89:127



U.S. Nuclear Regulatory Commission
Attn: Mr. George H. Bidinger, Section Leader
Uranium Fuel Section
Fuel Cycle Safety Branch, NMSS
Division of Industrial & Medical Nuclear Safety
Washington, DC 20555

License No. SNM-1227
Docket No. 70-1257

Dear Mr. Bidinger:

This letter is in response to your letter of October 6, 1989 which requested additional information with regard to the application for amendment to License No. SNM-1227 dated April 27, 1989. Enclosed with this letter are six copies of a written response to each of your questions and replacement pages to our license amendment.

If you have any additional questions, please contact me on (509) 375-8537.

Very truly yours,

C. W. Malody, Manager
Regulatory Compliance

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Enclosures
As Stated

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ADVANCED NUCLEAR FUELS CORPORATION
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RESPONSE TO QUESTIONS/COMMENTS

1. "In Section 2.3.1, identify the individuals or specify minimum qualifications of individuals on the staffs of the Vice President, Operations Division, and Vice President, Engineering Division, who are included in the membership of the Health and Safety Council."

Figure I-2.1 identifies those staff personnel having safety responsibilities and Safety Council membership reporting to the two Vice Presidents. Figure I-2.2 identifies safety professionals. Section 2.1 describes the responsibilities of those positions and Section 11.3 provides resumes of the current incumbents.

2. "In Section 2.3.2, the reference to the Manager, Facilities and Equipment Engineering, should be removed."

The reference should have been to the Manager, Equipment and Maintenance Engineering. A revised page 2-12 is enclosed.

3. "In Section 2.6.2 of the existing license, the Plant Criticality Safety Engineer is required to conduct at least monthly inspections of areas containing special nuclear material for compliance with criticality safety specifications and limits, as well as other safe practices. Identify the position(s) or the minimum qualifications of the individual(s) who will perform these inspections."

Revised Section 2.6.2 states that the Criticality Safety Component conducts monthly audits.

Under the old organization, the Plant Criticality Safety Engineer performed monthly audits, and the Criticality Safety Component of Corporate Licensing performed bi-monthly audits for a total of 18 audits/year. Under the new organization, the Plant Criticality Safety Engineer has disappeared and the Criticality Safety Component has effectively taken its place, and the number of audits per year is reduced to 12. However, where the Plant Criticality Safety Engineer was experienced in the practical application of criticality safety principles and practices, he did not have the expertise necessary to conduct criticality safety analyses and therefore, perhaps lacked certain insights. The two members of the Criticality Safety Component who will perform the monthly audits do have criticality safety calculational expertise such that the audit depth will be greater.

4. "In the application, identify the positions or departments that are responsible for preparing and approving general employee and operator training materials and certification criteria and for implementing training programs."

The preparation of detailed work and operating procedures, and the training of employees in these procedures, is the responsibility of the manager of each operation (i.e., Section 2.1.4, Item 1).

Establishment of minimum training requirements for various employee positions, training frequency, and conduct of such training for the various safety functions (radiological safety, fire safety, etc.) lies within the Safety, Security, and Licensing Department. Detailed training requirements in these safety areas are outlined in the various Company standards. A brief statement to training has been added to Section 2.4 (see revised page 2-13 enclosed).

5. "In the existing license, the area responsibilities of the Manager, Equipment and Maintenance Engineering, include, but are not limited to, the combustible gas detection and alarm systems; security alarm systems; plant engineering programs for HVAC systems; site water distribution and effluent services; process equipment; pressure vessels; as well as cranes and hoists. Identify the position(s) which will assume these area responsibilities."

The responsibilities of the Manager, Equipment and Maintenance Engineering, have not changed. The description of responsibilities was modified in that, on review, it appeared that his responsibilities were greater than a simple listing of a dozen items. The only changes in responsibilities resulting from the reorganization were the split between Operations and Engineering at the Vice Presidential level, and the combination of the Safety and Security function with the Corporate Licensing function at the Department level.

6. "The Approval and Responsibility Matrix, Figure I-2.3, should show the implementation responsibilities of the listed positions and components. In addition, please define the term "accept" used in the matrix."

The "implement" designation has been removed from the matrix because the documents listed are not implemented; they are to be followed or adhered to by all personnel. For example, the Radiation Protection Standards must be adhered to by any person working with radioactive material or working in a radiation zone, whether he is an employee of the Company or not.

The work "accept" in the matrix means that the organization can and will adhere to those requirements that pertain to areas and/or operations within his sphere of responsibility.

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<p>6. Appropriate managers within other organizations.</p> <p>7. Key safety engineers and specialists.</p> <p>Designated members of the Council make monthly inspections of buildings and grounds for housekeeping and safety practices, and report the findings to the Council at the monthly meetings. Findings are assigned to individuals for resolution and are held open until resolved.</p> <p><u>2.3.2 ALARA Committee</u></p> <p>An ALARA (As Low As Reasonably Achievable) Committee maintains awareness of trends in employee radiation exposure and radioactivity content of effluent releases. The membership of the Committee includes:</p> <ol style="list-style-type: none"> 1. Manager, Regulatory Compliance (Chairman). 2. Health Physics Specialist (Secretary). 3. Supervisor, Radiological and Industrial Safety. 4. Manager, Equipment and Maintenance Engineering. 5. Manager, Plant Maintenance. 6. Manager, Plant Operations. 7. Manager, Process Support Engineering. <p>The ALARA Committee shall convene at least semi-annually. The ALARA Committee shall issue a formal report at least annually to the Health and Safety Council reviewing employee exposures and effluent release data to determine:</p> <ol style="list-style-type: none"> 1. Trends in personnel exposures and effluents. 2. If personnel exposures or radioactive effluents might be lowered under the concept of ALARA. 3. If equipment for effluent and exposure control is properly designed, used, maintained, and inspected. <p>Their reports shall include review of required audits and inspections performed during the past year, and review of employee external exposures, bioassay results, unusual occurrences, effluent releases, in-plant airborne radioactivity, and environmental monitoring.</p>	
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2.4 Training

In addition to normal on-the-job training employees are instructed in radiation protection and criticality safety requirements and procedures, industrial safety, fire protection, and emergency procedures. The degree of training is commensurate with each employee's position in the Company (related to general and special responsibilities), and with the extent of the employee's contact with radioactive and fissionable materials. The minimum safety-related training requirements for various employee positions are established by the Safety, Security, and Licensing Department, including training and retraining schedules and training course content. Employee instruction is provided by personnel knowledgeable in the various training topics. All formal training is documented, and records are maintained by the Safety, Security, and Licensing Department.

2.4.1 Initial Training

Each employee is provided initial instruction adequate to allow him to safely start on-the-job training; they are provided the full instruction within two weeks after starting work. Prior to assignment to independent operation, each employee is required to have been instructed in radiation protection, criticality safety, and emergency requirements and procedures as appropriate to his position.

2.4.2 Followup Training

When changes are made in radiation protection, criticality safety controls (procedures, specifications, etc.), or in emergency procedures, each employee affected is promptly informed and properly instructed.

Safety topics are routinely discussed in monthly safety meetings. Additionally, each employee routinely working with special nuclear material receives annual refresher instruction as part of Advanced Nuclear Fuels continuing program in radiation protection and criticality safety awareness. The effectiveness of this annual refresher training is determined by giving the employees a written examination and reviewing the correct answers to the questions at the end of the test.

2.4.3 Health Physics Technician Training

Health Physics Technicians are given special training related to their radiation protection assignment. Previous training is accepted if considered equivalent to the Advanced Nuclear Fuels training program. Despite previous acceptable training, the Health Physics Technicians are

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required to become proficient in Advanced Nuclear Fuels radiation protection and criticality safety programs, criteria, specifications, procedures, and routines, as demonstrated by successfully passing an Advanced Nuclear Fuels certification examination within six months after employment as a Health Physics Technician. In addition, refresher training is provided to all Health Physics Technicians annually.

2.4.4 Training Evaluations

Employee awareness of, and conformity to, safety requirements and procedures, as well as the effectiveness of safety training programs, shall be evaluated at least monthly by the Radiological Safety Component for radiation protection, and by the Criticality Safety Component for criticality safety. These Advanced Nuclear Fuels staff members have the authority to require retraining of employees. These evaluations shall be documented along with actions required by them.

2.5 Operating Procedures, Standards and Guides

Advanced Nuclear Fuels conducts its business in accordance with a system of Standard Operating Procedures, Company Standards, and Policy Guides. Advanced Nuclear Fuels is committed to controlling activities involving special nuclear materials in accordance with these approved written procedures, standards, and guides. These documents are prepared, reviewed, revised, approved, and implemented in accordance with the Approval and Responsibility Matrix (Figure I-2.3). Plant and facility managers are responsible for assuring compliance with all pertinent radiation protection and criticality safety procedures, specifications, and practices within their respective facilities. Violations of radiation protection or criticality procedures, or specifications which are of repetitive or serious nature, are subject to disciplinary action.

The Supervisor, Radiological and Industrial Safety, is responsible for assuring that Health Physics Technician activities are conducted in accordance with established and approved procedures, methods, and frequencies.

2.6 Internal Audits and Inspections

Audits and inspections are conducted to determine that plant operations are conducted in compliance with regulatory requirements, license conditions, and written procedures. These audits and inspections apply to radiation protection, criticality safety, hazardous chemical safety, fire protection, and environmental protection.

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