PDR 70-1257

EXXON NUCLEAR COMPANY, Inc.

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June 19, 1980

Mr. W. T. Crow, Section Leader
Uranium Process Licensing Section
Uranium Fuel Licensing Branch
Division of Fuel Cycle & Material Safety
U.S. Nuclear Regulatory Commission
Washington, D. C. 20555

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

Dear Mr. Crow:

SUBJECT: License Renewal Application

Exxon Nuclear Company, Inc. hereby submits an amendment to its License Renewal Application to require only single stage HEPA filtration of exhaust air from ur cessing facilities. The requirement shall remain to in-place est all final HEPA filter installations in all such HVAC systems, irrespective of the number of stages of filtration, to assure that they are at least 99.95 percent efficient for the removal of 0.8 micron particles prior to release for routine operation. Based on past experience, Exxon Nuclear believes that it is possible to continue to meet the 50 µCi per calendar quarter limit imposed by Amendment No. 22 to License No. SNM-1227. Table 3.3-1 of the License Renewal Application has been appropriately modified.

Also, a typographical error on Figure 2.3-2 has been corrected.

The respective pages of the license application have been appropriately amended in accordance with this submittal, and seven copies of the amended pages are enclosed. Also, copies have been sent to the NRC Region V IE Office, and the Richland, WA, Public Library copy of the Application has been updated accordingly by Exxon Nuclear.

Sincerely,

H. Paul Estey

H. Paul Estey
Licensing & Compliance
Operating Facilities

Enclosures
CC: Mr. W. J. Cooley (USNRC Region V IE)
HPE/ajr

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Section/Appendix/Attachment ID: Application - License Conditions

TABLE 3.3-1 Minimum Stages of HEPA Filters in Exhaust Air Systems

Rev. 4

| Definition of Material, Area and/or Facility | No. of Stages |
|---|---|
| **Uranium** | |
| . Contamination Control Areas, Process Equipment & Enclosures where Unencapsulated Uranium Compounds are Handled | 1 |
| . Rooms & Facilities where Closed Fuel Rods (Both End-Caps Welded in Place) are Processed or Stored; or where Closed Containers, which have been Surveyed and Released by Radiological Safety Personnel, of Uranium Compounds are Stored | 0 |
| **Plutonium** | |
| . Process Equipment | 3 |
| . Contamination Control Areas | 2 |
| . Analytical Laboratories | |
| . Plutonium Handling Hoods & Equipment | 3 |
| . Rooms | 2 |
| . Rooms where Closed Containers, which have been Surveyed and Released by Radiological Safety Personnel, of Plutonium Compounds are Stored | 1 |
| . Rooms & Facilities where Closed Fuel Rods (Both End-Caps Welded in Place), which have been Surveyed and Released by Radiological Safety Personnel, are Processed or Stored | 0 |
| **Recirculation (Uranium and Plutonium)** | |
| In addition to the HEPA Filtration Provided in the Normally Operating Recirculation Air Systems | 1 |

Section/Appendix/Attachment ID: Application - License Conditions

FIGURE 2.3-2 APPROVAL & RESPONSIBILITY MATRIX

Rev.

A - Prepare/Primary Responsibility
B - Approve/Accept/Concur
C - Implement/Execute
D - Inspect/Audit

A primed letter (e.g., A') signifies that the respective individual is responsible for the respective function only as it relates to his area of responsibility.

| | Vice President & Executive-In-Charge Fuels Manufacturing | Manager, Manufacturing | Plant Managers | Manager, Manufacturing Engineering | Manager, Facilities & Equipment Engineering (ELO) | Manager, Maintenance | Manager, Auxiliary Operations | Manager, Plant Security | Industrial Safety Component | Plant Criticality Safety Engineer | Supervisor, Radiological Safety | Health Physics Technicians | Manager, Fuel Development & Testing(ET | Manager, Logistics | Manager, Corporate Licensing & Compliance Department | Manager, Licensing & Compliance Operating Facilities | Health Physics Component | Criticality Safety Component | Nuclear Criticality Safety Specialist | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Position Responsibilities & Authorities | B | A' | | | A' | | | | | | | | A' | A' | A'/B | | | | | | | |
| Position Professional Requirements | | B' | A' | A' | A' | A' | A' | | | | | | A' | A' | A'/B | | | | | | | |
| Radiation Protection Standards | B | B | B | | | | | | | | C | | | B | B | B | A/C/D | | | | | |
| Radiation Safety Operating Procedures | | B | | | | | B | | | | A | C | | B | | B | D | | | | | |
| Radiation Work Procedures | | | B'/C' | | B'/C' | B'/C' | | | | | A/D | D | B'/C' | B'/C' | | B | D | | | | | |
| Nuclear Crit. Safety Bases & Criteria | B | | | | | | | | | | | | | | B | | | B/C | A | | | |
| Nuclear Crit. Safety Standards | B | B | B | | | | | | | C/D | | | | | B | B | | A/C/D | B | | | |
| Nuclear Crit. Safety Analyses | | | | | | | | | | C | | | | | | | | A/D | | | | |
| Criticality Safety Specifications | | B' | B' | | B' | | | | | A/D | | | B' | B' | | B | | B/D | | | | |
| Rad. & Crit. Safety Insp./Audit Programs | | | | | | | B' | | | A'/C' | A' | C' | | | | B' | A'/C' | A'/C' | | | | |
| Operating Procedures | | B' | A'/C' | | A'/C' | | | | | | | | A'/C' | A'/C' | | | | | | | | |
| Rad. Waste Treat. & Disposal Programs | B | A' | C' | | A'/C' | | | | | | D | D | A'/C' | | B | B | D | | | | | |
| Environmental Surveillance Program | B | | | | | | | | | | | | | | B | B/D | A/C | | | | | |
| Emergency Plan & Procedures | B | B | C' | C' | B'/C' | C' | A | | C' | | C' | C' | B'/C' | C' | B | | | | | | | |
| Access Controls | | B' | A'/C' | | A'/C' | | | A'/C' | | | D | D | A'/C' | A'/C' | B | B | | | | | | |
| Training Programs | | B' | A'/C' | | A'/C' | A'/C' | B' | A'/C' | A'/C' | A'/C' | A' | C' | A'/C' | A'/C' | | | D' | D' | | | | |
| Process & Equipment Changes | | B' | B' | A'/C' | A'/C' | C'/D' | | | B'/D' | B'/D' | B'/D' | D' | A'/C' | | | B | B' | B'/D' | | | | 14 |
| Process Test Authorizations | | B' | B' | A'/B' | B' | | B | | | B'/D' | B'/D' | D' | B' | | | B | B' | B' | | | | |
| Incident Investigations & Reporting | A | B' | B' | | B' | | | | | | | | B' | B' | B | B | | | | | | |
| Records | | | A' | A' | A' | A' | A' | A' | A' | A' | A' | A' | A' | A' | | A' | A' | A' | | | | |