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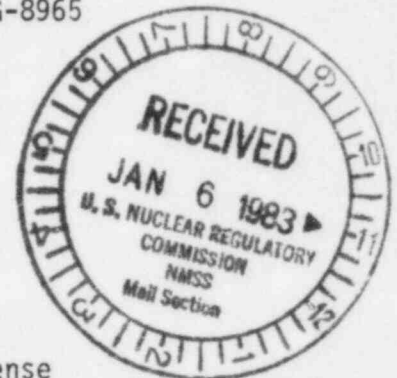
Rockwell
International

70-25
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December 17, 1982

In reply refer to 82ESG-8965

Mr. R. G. Page, Chief
Uranium Fuel Licensing Branch
Division of Fuel Cycle and Material Safety
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555



Reference: Application dated August 25, 1982, for
Renewal of Special Nuclear Materials License
No. SNM-21, Docket 70-25

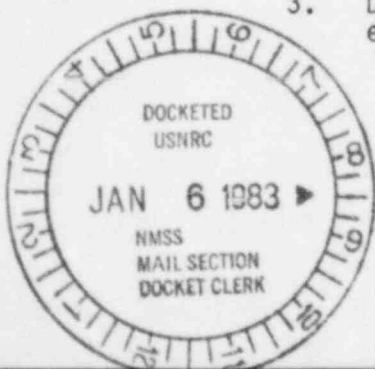
Dear Mr. Page:

Subject: Renewal of Special Nuclear Materials License
No. SNM-21, Docket 70-25

Application for renewal of the Energy Systems Group Special Nuclear Materials License No. SNM-21 pursuant to Section 70.33 of Part 70, Title 10, Code of Federal Regulations was made by our letter of transmittal dated August 20, 1982. Subsequent to that submission, our business situation has changed significantly, and it is now appropriate to modify the application to describe more accurately the activities and facilities to be authorized by the license for our future programs.

The changes in the modified license application include the following:

1. Removal of Building 001 at Headquarters and Building 055 at the SSFL site as authorized facilities for manufacturing and R&D activities, respectively, but retention of them as contaminated facilities until they are decontaminated and released for unrestricted use.
2. Reduction of the possession limit for U-235 from 1500 kg to 10 kg.
3. Deletion of the authorization to manufacture nuclear fuel elements.



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4. Deletion of the authorization to possess U-233.

These changes have been discussed in some detail in meetings with you and your licensing staff during the last few weeks. This letter is to transmit formally the modifications to the license renewal application as agreed in those discussions.

The requested modification to the license renewal application as originally submitted August 25, 1982, is submitted in Enclosure 1 for your review and approval.

An attachment to Enclosure 1 includes revised replacement pages for those portions of Section 1.0, Part I, of the supporting technical information for the application; i.e., ESG-82-33, "Health & Safety Sections for Renewal Application of the Special Nuclear Materials License SNM-21, Docket 70-25, Issued to the Energy Systems Group of Rockwell International." The revised portions of the pages are indicated by vertical bars in the right margins of the pages.

Enclosure 2, consisting of annotated revised replacement pages for the original license renewal application, is included to provide a clearly marked up modified application for your convenience. The deletions in the original application are indicated with dashes throughout the text, while all additions to the text are identified by underlining.

Ten copies of each of the enclosures are included here.

The renewal application as originally submitted was applicable to a Category 1.A license, as defined in Section 170.31 of 10 CFR 170. Accordingly, we submitted a license renewal fee of \$76,800 with the application. The enclosed application modification changes the license to a Category 1.E under 10 CFR 170.31. The renewal fee for this latter license is only \$38,100. Therefore, a refund of \$38,700 is due. This change in the category of the license has been discussed with Mr. William O. Miller, Chief, License Fee Management Branch, and he indicated that he concurred in this evaluation of license application modification. We would appreciate your and his attention to the refund of the excess fee submitted with our original renewal application.



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If you have questions or require additional information relative to these changes in our license renewal application, please contact me at (213) 700-4439.

Sincerely yours,

M. E. Remley, Director
Health, Safety & Radiation
Services
Energy Systems Group

1146A/reg

Enclosures (1) Modification to SNM License Renewal Application (10)
(2) Annotated Revised Pages to SNM License Renewal Application (10)

cc w/o enclosure: William O. Miller, NRC Headquarters

MODIFICATION
TO
APPLICATION
TO
OFFICE OF NUCLEAR MATERIAL SAFETY AND SAFEGUARDS
OF THE
UNITED STATES NUCLEAR REGULATORY COMMISSION
FOR
RENEWAL OF SPECIAL NUCLEAR MATERIAL LICENSE NO. SNM-21
DOCKET 70-25
DATED AUGUST 25, 1982

In Section C.1), change 1500 to 10.

Delete Section C.2) in its entirety

Change Section C.3) to C.2) and make first sentence read ". . . contained in alloys in irradiated fuel of any chemical or physical form." Delete second sentence in its entirety.

Change Section C.4) to C.3)

Add Section C.4) to read: "1.0 kg of plutonium (principally Pu-239) as sealed sources (Pu-Be sources)."

Change first sentence of Section D to read ". . . programs and nuclear fuel decladding activities utilizing special nuclear materials . . . ". Add the following sentence to this section: "However, as indicated in


Section 1.5, two facilities described in that document, Bldg 001 at headquarters and Bldg 055 at the SSFL site are being retained in this application only for authorization of the decontamination and decommissioning of those two facilities. When the decommissioning is completed, the facilities will be removed from the license."

Add the following sentence to Section J: "Note that the portions of the referenced plan pertinent to Bldg 001 at headquarters and Bldg 055 at the SSFL site have been initiated as of this revision."

Revise Section 1.0, Part I, "STANDARD CONDITIONS AND SPECIAL AUTHORIZATIONS" of the supporting technical document, ESG-82-33, "Health and Safety Sections for Renewal Application of the Special Nuclear Materials License SNM-21, Docket 70-25, Issued to Energy Systems Group of Rockwell International," to read as shown in the revised replacement pages dated December 17, 1982, attached to this captioned application.

ROCKWELL INTERNATIONAL CORPORATION
Energy Systems Group

By:


M. E. Remley, Director
Health, Safety & Radiation
Services

17 December 1982
(Date)

1100A/reg

1.0 STANDARD CONDITIONS AND SPECIAL AUTHORIZATIONS

1.1 NAME

Rockwell International Corporation, acting through its Energy Systems Group, is responsible for operations under Special Nuclear Materials License SNM-21, Docket 70-25. Rockwell International is incorporated in the State of Delaware with corporate headquarters in Pittsburgh, Pennsylvania.

1.2 LOCATION

Operations under the license (SNM-21) are carried out at the following two sites:

- 1) The headquarters facilities of the Energy Systems Group are located at 8900 De Soto Avenue, Canoga Park, California 91304. Operations under the license (SNM-21) are carried out principally in the shops (Building 001) and in the chemistry laboratories (Building 004).

Other locations used for special nuclear materials (SNM) waste storage are Building 131 and Yard Areas 507, 508, and 511.

- 2) The Santa Susana Field Laboratories (SSFL) are located in the Simi Hills in Ventura County, California. Operations under this license are carried out principally in the Rockwell International Hot Laboratories (RIHL) (Building 020) and the Nuclear Material Development Facility (Building 055).

1.3 LICENSE NUMBER

The license under which operations described in this report are conducted is SNM-21 (Docket 70-25). The previous expiration date of this license was July 31, 1975. Renewal was on September 15, 1977. The current expiration date is September 30, 1982.

1.4 POSSESSION LIMITS

<u>Byproduct, Source, and/or Special Nuclear Material</u>	<u>Chemical and/or Physical Form</u>	<u>Maximum Amount that Licensee May Possess at Any One Time Under this License</u>
A. Uranium enriched in the U-235 isotope	A. Any enrichment or form except UF ₆	A. 10 kg U-235
B. Pu (principally Pu-239)	B. Any	B. Maximum of 3.5 kg total Pu

ESG-82-33

I.1-1

Revised 12/17/82

<u>Byproduct, Source, and/or Special Nuclear Material</u>	<u>Chemical and/or Physical Form</u>	<u>Maximum Amount that Licensee May Possess at Any One Time Under this License</u>
C. Pu (principally Pu-239)	C. Sealed sources (as Pu-Be sources)	C. 1.0 kg total Pu
D. Pu (principally Pu-238)	D. Sealed sources	D. 0.5 kg total Pu

1.5 LOCATION WHERE MATERIAL WILL BE USED

Reference Item A, section 1.4	Used at Buildings 001 and 004 at headquarters and Buildings 020 and 055 at the SSFL site*
Reference Item B, Section 1.4	1) SSFL Site <ul style="list-style-type: none"> a. Hot Laboratory--up to 3.5 kg Pu in irradiated fuel b. Pu Facility--up to 3.5 kg Pu, less than 1.0 kg in process* 2) Headquarters Site <ul style="list-style-type: none"> a. A maximum of 2 g total Pu for gamma spectroscopy and radiometric counting analyses
Reference Items C and D, Section 1.4	Used in any building at either or both sites.

*Building 001 at headquarters and Building 055 at the SSFL site are included here as authorized facilities. However, all fuel fabrication and research and development activities involving handling and use of special nuclear materials are being terminated. Retention of the facility authorizations is only for decontamination and decommissioning activities. When the facilities have been decommissioned and can be released for unrestricted use, the license authorization will be terminated.

1.6 DEFINITIONS

Generally, standard reference terms are used throughout this document. The following brief definitions are supplied for terms that may be unique.

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1.7 AUTHORIZED ACTIVITIES

Authorized activities are the conduct of broad research and development programs and nuclear fuel-element decladding utilizing special nuclear materials of various forms and enrichments. Also authorized are disposing to approved sites of scrap material and waste and transferring and shipping of finished material and specimens resulting from all activities.

1.8 EXEMPTIONS AND SPECIAL AUTHORIZATIONS

There are no exemptions or special authorization required.

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ESG-82-33

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Revised 12-17-82

C. DESCRIPTION OF SPECIAL NUCLEAR MATERIAL COVERED BY THIS APPLICATION

- 1) ~~1500~~ 10 kg of uranium-235 contained in uranium or plutonium in various enrichments in any chemical or physical form.
- 2) ~~5-kg-of-uranium-233-contained-in-uranium-or-plutonium-in-various-enrichments-in-any-chemical-or-physical-form.~~
- 3) 2) 3.5 kg of plutonium (principally Pu-239) as metal or contained in alloys in irradiated fuel of any chemical or physical form. ~~Up-to-2.6-kg-of-this-material-to-be-used-in-the-glove-box-facilities-at-the-NDFL:~~
- 4) 3) 0.5 kg of plutonium (principally Pu-238) in the form of sealed sources.
- 4) 1.0 kg of plutonium (principally Pu-239) as sealed sources (Pu-Be sources).

D. DESCRIPTION OF PROPOSED ACTIVITY

Applicant proposes to conduct broad research and development programs and nuclear fuel ~~manufacturing~~ decladding activities utilizing special nuclear materials of various forms and enrichments as described in ESG-82-33, "Health and Safety Sections for Renewal Application of the Broad Nuclear Materials License No. SNM-21, Docket 70-25, Issued to Energy Systems Group of Rockwell International." This document is included as Attachment 2.

However, as indicated in Section 1.5, two facilities described in that document, Building 001 at headquarters and Building 055 at the SSFL site, are being retained in this application only for authorization of the decontamination and decommissioning of those two facilities. When the decommissioning is completed, the facilities will be removed from the license.

E. TECHNICAL QUALIFICATIONS AND PROCEDURES FOR ASSURING RADIATION AND NUCLEAR SAFETY

A detailed presentation of Energy Systems Group's experience in handling nuclear materials, its facilities, and the administrative and technical controls employed to assure safety at the group is described in ESG-82-33.

F. SPECIAL NUCLEAR MATERIAL CONTROL AND ACCOUNTING

Applicant's special nuclear material control and accounting procedures, as required by 10 CFR 70.58, have been previously submitted as AI-75-15, "Fundamental Material Controls for Special Nuclear Materials," which is incorporated herein by reference.

I. RADIOLOGICAL CONTINGENCY PLAN

Applicant's radiological contingency plan to ensure that adequate onsite emergency response actions will be taken in the event a potentially serious radiation accident should occur has been previously submitted and approved in the form of ESG-81-30, "Onsite Radiological Contingency Plan for Rockwell International Operations Licensed Under Special Nuclear Material License No. SNM-21," and is incorporated herein by reference.

J. DECONTAMINATION PLAN

Applicant's decontamination plan for the licensed plan has been previously submitted and approved in the form of AI-78-10, "Decontamination Plan," and is incorporated herein by reference. The preliminary cost estimates and financial arrangements for the decontamination of the facilities have been updated and are included here as Attachment 4. Note that, as of this revision, the portions of the referenced plan pertinent to Building 001 at headquarters and Building 055 at the SSFL site have been initiated at a low level of effort subject to release of additional funding by DOE.

K. FINANCIAL QUALIFICATIONS

Rockwell International Corporation Annual Report for 1981 is forwarded with this application. This report indicates total assets of \$4,809,000,000 for the fiscal year ending September 30, 1981. Rockwell International Corporation has a Dun and Bradstreet rating of 5A1.

ROCKWELL INTERNATIONAL CORPORATION
Energy Systems Group

By /s/ F. W. Feiler
for M. E. Remley, Director
Health, Safety & Radiation
Services

August 25, 1982

Date