

70-1100



April 5, 1994  
ML-94-017

Docket No. 70-1100  
License No. SNM-1067

Mr. Robert C. Pierson, Chief  
Licensing Branch  
Division of Fuel Cycle Safety and Safeguards  
Office of Nuclear Materials Safety and Safeguards  
U.S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, D.C. 20555

Subject: Request for Temporary Suspension

Reference: (A) Letter, A. E. Scherer (CE) to R. M. Bernero (NRC), RA-93-003,  
dated March 30, 1993.

Dear Mr. Pierson:

As you know, Combustion Engineering, Inc. (CE) is in the process of decontaminating and decommissioning its Windsor commercial nuclear fuel manufacturing complex, and has submitted a Decommissioning Plan to the NRC in support of the activity [Reference (A); which is currently under review]. In the interim, we have initiated decontamination activities under the conditions and requirements of our license, SNM-1067.

We have recently contracted with an outside vendor to provide professional decontamination services, and we expect said activities to commence within thirty days. The contractor will meet day-to-day license and facility procedural requirements under the general cognizance of a CE project manager. Effective at 4:00 P.M. today, and during the suspension period of up to thirty days, CE has suspended all decontamination and decommissioning (i.e., licensed) activities in the Buildings 17/21 complex. It is the purpose of this letter to request your concurrence for temporary suspension of license requirements that would come due during the suspension period; normal licensed activities would then resume, and compliance with license requirements would also resume, as if no time had passed.

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Mr. Robert C. Pierson  
April 5, 1994

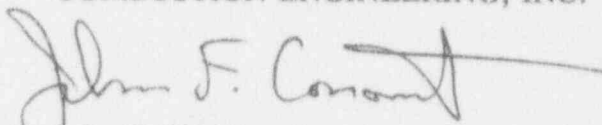
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The Enclosure to this letter provides conditions and requirements that have little or no safety value while the facility is secured. CE requests a suspension from these and similar requirements during the suspension period. We appreciate the NRC's attention and expeditious handling of this matter.

If there are questions or comments regarding this issue, please feel free to contact me at (203) 285-5002.

Very truly yours,

COMBUSTION ENGINEERING, INC.

A handwritten signature in black ink, appearing to read "John F. Conant", with a long horizontal flourish extending to the right.

John F. Conant  
Manager  
Nuclear Materials Licensing

xc: S. Soong (NRC)  
J. Noggle (NRC - Region I)

COMBUSTION ENGINEERING, INC.

FORMER WINDSOR NUCLEAR FUEL MANUFACTURING FACILITY

APRIL 1994

COMBUSTION ENGINEERING, INC.

FORMER WINDSOR NUCLEAR FUEL MANUFACTURING FACILITY

During the suspension period, there are license requirements that would require certain activities to be carried out, such as those outlined below. CE is requesting NRC concurrence in the temporary suspension of such requirements during the transition to a decontamination contractor.

A. LICENSE APPLICATION - PART I:

Sect 2.7.1 - On a monthly basis, Technicians shall perform a documented inspection using prepared checklist to review the conduct of facility operations.

Sect 3.1.2 - As a minimum, RWP's shall be reviewed for their need every 30 days.

Sect 3.2.3 - Ventilation air exhaust in Building 17 is analyzed each day.

- Direction of air flow shall be checked monthly and documented.
- Pressure drop for ventilation systems will be checked weekly & documented
- Hood face velocities will be checked weekly

Sect 3.2.8 - Contaminated areas shall be surveyed on a weekly basis.

- Other manufacturing areas shall be surveyed on a monthly basis.
- The lunch rooms shall be surveyed once a day.

Sect 6.0 - RP&IS Technicians monitor the day-to-day compliance

B. FNMCP & "CRITICAL PROCEDURES":

The amount of U-235 in the Building 17/21 complex is limited to 700 g, contained in <5% UO<sub>2</sub>. Areas in the complex possibly containing UO<sub>2</sub> will be secure, and SNM will not be moved or handled. A similar suspension of FNMCP and Critical Procedure requirements that would become due during the suspension period is also requested.

C. EMERGENCY PLAN & EPIP:

No SNM will be moved or handled in the Building 17/21 complex during the suspension period. A suspension of Radiological Contingency Plan (Emergency Plan) requirements such as surveillance, training, and similar non-emergency requirements that may become due during the suspension period is also requested.