

JAN 15 1991

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

Advanced Nuclear Fuels Corporation  
ATTN: Mr. C. W. Malody, Jr., Manager  
Regulatory Compliance  
2101 Horn Rapids Road  
Richland, Washington 99352-0130

Gentlemen:

This refers to your application and supplement dated July 25, 1990 (submitted by letters dated September 4 and October 2, 1990, respectively), requesting a license amendment regarding organizational changes.

Our review of your application has identified additional information that is needed before final action can be taken on your request. The application and the additional information, specified in the enclosure, should be provided in the form of a revised application within 30 days of the date of this letter.

We again request that the pages of the revised amendment application have the same date as the transmittal letter.

Sincerely,

Original Signed By:

Scott Pennington  
Uranium Fuel Section  
Fuel Cycle Safety Branch  
Division of Industrial and  
Medical Nuclear Safety, NMSS

Enclosure: As stated

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Questions/Comments  
Application Submitted By Letter Dated September 4, 1990  
Advanced Nuclear Fuels Corporation  
Docket No. 70-1257

With regard to your amendment application, please respond to the following:

<u>Section</u>	<u>Questions/Comments</u>
2.1	The responsibilities of the Environmental Engineering Component should be included in this section.
2.1.18	Replace "Chemical and Ceramic Development" with "Manufacturing Technology." In addition, state to whom the Manager of Manufacturing Technology reports.
2.2	The minimum education and experience requirements for the Environmental Engineering Specialist should be provided.
Figure I-2.1	The figure should be revised to incorporate the Manager, Product Development and Testing.
Figure I-2.3	<p>In the supplement, the Manager, Operations Planning and Scheduling, has been replaced by the Supervisor, Traffic and Warehousing. This change should be reflected in the "Approval and Responsibility Matrix."</p> <p>The matrix should identify the positions having responsibility for auditing operating procedures as well as safety procedures for activities performed by the nuclear criticality safety, health physics, radiation safety, and environmental engineering components. Furthermore, the matrix should identify the positions responsible for approving safety procedures.</p> <p>The responsibilities of the Manager, Product Development and Testing, should be identified in the matrix.</p>
11.3	The education and experience of the Manager, Product Development and Testing, should be provided.

<u>Section</u>	<u>Questions/Comments</u>
11.3.9	This section should be revised to provide the education and experience of the Supervisor, Traffic and Warehousing.
11.4	In this section, the licensee proposes that operating procedures be approved by the Managers of the User Group; Quality Control; Safety, Security, and Licensing; Plant Engineering; and Process Engineering. However, the licensee has neither identified the positions comprising the User Group nor indicated in the "Approval and Responsibility Matrix" that the Managers of the User Group; Quality Control; and Safety, Security, and Licensing will be responsible for approving operating procedures.
11.5.3	The licensee proposes that emergency response training be only offered to members of the Plant Emergency Response Team. This proposed change would appear to decrease the response effectiveness of the Team and contradicts the personnel training requirements in Section 8.1.1 of the Emergency Plan.
11.6.2	In the first sentence, the words "Radiological and Industrial" should be deleted.
11.6.6.1	In the Startup Council membership, the position of Manager, Plant Operations, is listed twice as a member-at-large.

In addition, Sections 7.3.2 and 10.1.1 should be revised to correctly reflect the storage location of the plutonium contaminated waste in the Speciality Fuels Building.