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July 18, 1996

Mr. W. N. Hickey  
Chief, Enrichment Branch  
Division of Fuel Cycle Safety  
and Safeguards, NMSS  
United States Nuclear Regulatory Commission  
Washington, D.C. 20555-0001

SERIAL: GDP 96-0144

**Paducah Gaseous Diffusion Plant (PGDP)**

**Docket No. 70-7001**

**Responses to NRC Questions/Comments on Revision 3 of the Certification Application**

Dear Mr. Hickey:

By letter dated June 19, 1996, the U.S. Nuclear Regulatory Commission (NRC) forwarded to the United States Enrichment Corporation (USEC), various NRC questions/comments on USEC's Revision 3 (May 31, 1996) application for a certificate of compliance for the Paducah Gaseous Diffusion Plant.

Attached is USEC's revised response to one of the NRC questions/comments from the June 19, 1996 letter. The enclosure provides a status of the response to each of the Group A and B and Revision 3 questions/comments.

The attached response needs to be reviewed by DOE and USEC for impact on the Compliance Plan. Any changes that are necessary to the Compliance Plan will be incorporated in a subsequent revision.

Should you have any questions or require additional information, please contact me at (301) 564-3413 or Steve Routh at (301) 564-3251.

Sincerely,

*R. R. Lawton for*

Robert L. Woolley  
Nuclear Regulatory Assurance and Policy Manager

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Mr. John W. N. Hickey  
July 18, 1996  
GDP 96-0144 Page 2

Enclosure:       Status of Responses to Group A & B and Revision 3 Questions, Paducah  
                    Gaseous Diffusion Plant

cc:           NRC Region III Office  
              NRC Resident Inspector - PGDP  
              NRC Resident Inspector - PORTS  
              DOE Regulatory Oversight Manager  
              DOE HQ

**STATUS OF RESPONSES TO  
GROUP A & B AND REVISION 3 QUESTIONS  
PADUCAH GASEOUS DIFFUSION PLANT**

**Introduction**

Submitted 10/25: INQ1  
Working: None

**Chapter 1**

Submitted 10/25: 1.0Q1-8  
Submitted 12/1: 1.0Q10, 11  
Submitted 12/8: 1.0Q12  
Submitted 12/14: 1.0Q13  
Submitted 2/9: Revised 1.0Q1  
Submitted 7/2: 1.0Q14-17  
Working: None

**Chapter 2**

Submitted 10/25: 2.0Q1-3  
Submitted 12/1: 2.0Q6-11  
Submitted 12/8: 2.0Q12  
Submitted 12/13: 2.0Q5  
Revised 2.0Q1  
Submitted 2/12: 2.0Q13, 14  
Revised 2.0Q1, 5  
Submitted 4/25: Revised 2.0Q5  
Submitted 6/28: 2.0Q15  
Submitted 7/18: Revised 2.0Q15  
Working: None

**Chapter 3**

Submitted 11/15: 3.0Q1-13, 15-23  
Submitted 6/27: 3.0Q24  
Working: None

**Chapter 4**

Submitted 11/22: 4.0Q6-8, 10-12, 15, 16, 18, 20, 23, 128, 129, 130, 132, 134, 135, 137-149, 151-204, 206-223, 225, 228, 233, 234, 237-254  
Submitted 12/8: 4.0Q1, 2, 3, 4, 5, 9, 13, 14, 17, 19, 21, 22, 24, 25, 131, 150, 205, 226, 227, 230-232, 235, 236  
Submitted 12/13: 4.0Q136, 229, 255, 258  
Submitted 12/22: 4.0Q133, 224

**STATUS OF RESPONSES TO  
GROUP A & B AND REVISION 3 QUESTIONS  
PADUCAH GASEOUS DIFFUSION PLANT**

**Chapter 4 (Cont'd)**

Submitted 3/1:	4.0Q263-265 Revised 4.0Q3-13, 15, 16, 18, 19, 21, 22, 129, 131, 132, 135, 136, 139, 140-143, 146, 147-150, 152-154, 156, 157, 159, 161, 163, 165-179, 184-190, 193-195, 197-200, 203-208, 210, 212, 214-218, 221, 222, 224-226, 228, 229, 231-234, 236, 238, 240, 246
Submitted 3/6:	Revised 4.0Q4, 13, 152, 223
Submitted 3/7:	Revised 4.0Q18, 23, 149, 160, 192, 219
Submitted 3/11:	4.0Q188, 210, 211
Submitted 3/27:	Revised 4.0Q213
Submitted 6/27:	4.0Q266-270
Working:	None

**Section 5.1**

Submitted 10/25:	5.1Q1-11, 17-20, 24-29, 32-41
Submitted 12/1:	5.1Q43-46, 48, 49, 51-61 Revised 5.1Q5, 20, 34
Submitted 2/9:	5.1Q62-65
Working:	None

**Section 5.2**

Submitted 11/8:	5.2Q1-3, 5, 7-10, 12, 15, 16, 19
Submitted 1/5:	5.2Q20-25
Submitted 3/6:	Revised 5.2Q16, 25
Submitted 6/28:	5.2Q28-34
Working:	None

**Section 5.3**

Submitted 10/25:	5.3Q1, 3-10, 12-16, 18, 19, 21, 24-46, 48-52, 54, 56
Submitted 11/8:	5.3Q2, 11
Submitted 12/1:	5.3Q58-69, 71-77, 80-83, 86-90 Revised 5.3Q1, 2, 6, 7, 8, 9, 11, 12, 19, 29, 34, 39, 40, 50, 51, 56
Submitted 12/8:	Revised 5.3Q45
Submitted 12/12:	5.3Q84
Submitted 2/23:	5.3Q93, 95-97, 99-103, 108, 109, 111, 112 Revised 5.3Q11, 12, 13, 61, 63, 65, 68
Submitted 2/29:	5.3Q94 Revised 5.3Q2, 58, 93, 103
Submitted 3/13:	Revised 5.3Q58

**STATUS OF RESPONSES TO  
GROUP A & B AND REVISION 3 QUESTIONS  
PADUCAH GASEOUS DIFFUSION PLANT**

**Section 5.3 (Cont'd)**

Submitted 4/11:	Revised 5.3Q39, 80
Submitted 4/26:	Revised 5.3Q81, 94
Submitted 5/2:	Revised 5.3Q19
Submitted 6/27:	5.3Q113-121, 123-126
Submitted 7/2:	5.3Q122
Working:	None

**Section 5.4**

Submitted 10/25:	5.4Q1-7, 10-21
Submitted 12/8:	5.4Q22-27, 29-40
	Revised 5.4Q7, 12
Submitted 2/23:	5.4Q41, 42, 44-47, 49-51
	Revised 5.4Q12, 23, 24, 25, 30, 32, 33, 34, 35, 36
Submitted 3/1:	5.4Q43, 48
Working:	None

**Section 5.6**

Submitted 10/25:	5.6Q1, 31, 32, 35-55, 57, 59-62, 65, 66
Submitted 11/8:	5.6Q3, 30, 33, 56, 63, 64
Submitted 11/17:	5.6Q2, 34, 58
	Revised responses to 5.6Q1, 30-32, 35, 37, 38, 42, 43, 51, 54, 55, 57-62, 65, 66
Submitted 1/18:	5.6Q67-81, 83-85, 87-93
	Revised 5.6Q1
Submitted 2/9:	5.6Q94-97, 99
Submitted 2/29:	Revised 5.6Q1, 87
Submitted 3/6:	Revised 5.6Q1
Submitted 3/28:	5.6Q86
	Revised 5.6Q44
Submitted 3/29:	Revised 5.6Q1
Working:	None

**Section 5.7**

Submitted 10/25:	5.7Q2-4, 8, 10, 11
Submitted 12/1:	5.7Q13
Submitted 2/12:	5.7Q14
Working:	None

**STATUS OF RESPONSES TO  
GROUP A & B AND REVISION 3 QUESTIONS  
PADUCAH GASEOUS DIFFUSION PLANT**

**Section 6.1**

Submitted 10/25:	6.1Q1-12, 14, 16-20
Submitted 12/1:	6.1Q24
Submitted 12/12:	6.1Q25
Submitted 6/28:	6.1Q26
Working:	None

**Section 6.2**

Submitted 10/25:	6.2Q1-3, 5-17, 23, 24, 27-29
Working:	None

**Section 6.3**

Submitted 10/25:	6.3Q1-13
Submitted 11/8:	6.3Q14
Submitted 12/1:	6.3Q15-19
Working:	None

**Section 6.4**

Submitted 10/25:	6.4Q1-13, 15-39
Submitted 12/1:	6.4Q41-43 Revised 6.4Q4, 26, 30
Submitted 12/22:	6.4Q44 Revised 6.4Q36
Submitted 2/9:	6.4Q45-47 Revised 6.4Q26, 30, 43
Submitted 3/28:	Revised 6.4Q4, 42
Working:	None

**Section 6.5**

Submitted 10/25:	6.5Q12-26, 29-32, 34
Submitted 12/1:	6.5Q35-37
Submitted 6/28:	6.5Q38
Working:	None

**STATUS OF RESPONSES TO  
GROUP A & B AND REVISION 3 QUESTIONS  
PADUCAH GASEOUS DIFFUSION PLANT**

**Section 6.6**

Submitted 11/8:	6.6Q1-14, 16-29, 31-36
Submitted 1/18:	6.6Q39, 40, 43-52, 56-63
	Revised 6.6Q2, 3, 13, 23, 27
Submitted 1/19:	6.6Q42, 53, 55
	Revised 6.6Q7, 26, 28
Submitted 2/9:	6.6Q64-70
	Revised 6.6Q28, 46, 47, 48, 50, 61, 62
Submitted 2/29:	Revised 6.6Q7, 17
Submitted 3/28:	Revised 6.6Q1, 28
Working:	None

**Section 6.7**

Submitted 10/25:	6.7Q1-9
Submitted 1/5:	6.7Q10-13
	Revised 6.7Q4
Working:	None

**Section 6.8**

Submitted 11/9:	6.8Q1-12, 15-18
Submitted 12/22:	6.8Q19, 20
Submitted 2/12:	6.8Q21
	Revised 6.8Q3, 7, 9, 11, 12, 15
Submitted 3/19:	Revised 6.8Q11
Working:	None

**Section 6.9**

Submitted 10/25:	6.9Q1, 8-23
Submitted 11/8:	6.9Q2-7
Submitted 12/1:	6.9Q24-30
Submitted 2/23:	6.9Q31-33
	Revised 6.9Q26, 29
Submitted 3/19:	Revised 6.9Q32
Submitted 4/25:	Revised 6.9Q16
Submitted 6/28:	Revised 6.9Q16
Working:	None

**STATUS OF RESPONSES TO  
GROUP A & B AND REVISION 3 QUESTIONS  
PADUCAH GASEOUS DIFFUSION PLANT**

**Section 6.10**

Submitted 10/25:	6.10Q1-9, 11-17
Submitted 11/8:	6.10Q10
Submitted 12/1:	6.10Q18-24
	Revised 6.10Q2
Submitted 2/23:	6.10Q25, 26
	Revised 6.10Q21
Working:	None

**Section 6.11**

Submitted 11/9:	6.11Q1-42
Submitted 2/23:	6.11Q43-51
	Revised 6.11Q2, 3, 4, 6-9, 12, 13, 15-19, 21-25, 28-36, 38-42
Submitted 3/7:	Revised 6.11Q51
Submitted 3/29:	Revised 6.11Q51
Working:	None

**Quality Assurance Program**

Submitted 10/25:	QAQ1, 4-16, 19-23
Submitted 11/16:	QAQ2, 3, 17, 18
Submitted 1/11:	QAQ27, 30, 31, 32, 33, 34, 36, 37
	Revised QAQ15, 16
Submitted 3/28:	QAQ24, 25, 26, 28, 29, 35
	Revised QAQ1, 2, 3, 4, 5, 10, 11, 17, 18, 23, 27, 37
Submitted 4/11:	QAQ38-40, 42, 43, 45-51
Submitted 4/26:	QAQ41
	Revised QAQ2
Submitted 5/16:	QAQ44
Submitted 5/22:	Revised QAQ2
Working:	None

**Emergency Plan**

Submitted 11/8:	EPQ2-9, 11-13, 15, 16, 18, 20
Submitted 1/5:	EPQ21, 25, 26
Submitted 2/9:	EPQ27, 29, 30
Submitted 6/27:	EPQQ31
Working:	None



**STATUS OF RESPONSES TO  
GROUP A & B AND REVISION 3 QUESTIONS  
PADUCAH GASEOUS DIFFUSION PLANT**

**Environmental Compliance Status Report**

Submitted 10/25: ECQ1, 2, 6, 7, 9  
Working: None

**Fundamental Nuclear Materials Control Plan**

Submitted 11/8: FNQ1-40  
Submitted 1/3: FNQ41-44  
Revised FNQ5, 29, 30  
Submitted 2/20: FNQ45-47  
Revised FNQ42, 43  
Submitted 7/3: FNQ72-92  
Working: None

**Transportation Security Plan**

Submitted 11/8: STQ10-14, 17, 19, 20, 23-26, 28, 32, 33, 40-43  
Working: None

**Physical Security Plan**

Submitted 11/9: PSQ3, 7-11, 19, 21, 24, 29, 35, 41-43  
Working: None

**Classified Matter Security Plan**

Submitted 11/8: CMQ1-12  
Submitted 12/15: CMQ28-30  
Working: None

**Radioactive Waste Management Program**

Submitted 10/25: RWQ2-5  
Submitted 11/8: RWQ1  
Submitted 1/10: RWQ6-9  
Submitted 2/9: RWQ11  
Submitted 3/20: RWQ10  
Submitted 4/26: Revised RWQ10  
Submitted 5/2: Revised RWQ10  
Submitted 6/27: RWQ12-14  
Working: None

**STATUS OF RESPONSES TO  
GROUP A & B AND REVISION 3 QUESTIONS  
PADUCAH GASEOUS DIFFUSION PLANT**

**Depleted Uranium Management Plan**

Submitted 10/25: DUQ1  
Working: None

**Decommissioning Funding Program**

Submitted 10/25: DFQ1-3  
Submitted 12/8: Revised DFQ1  
Submitted 2/9: DFQ4  
Revised DFQ1  
Working: None

**Supplemental Environmental Information**

Submitted 10/25: SEQ1-4  
Working: None

**Technical Safety Requirements**

Submitted 12/1: TSRQ1-3, 5, 6, 20, 29-33, 37, 40, 42-59, 230-237, 239, 241, 242, 244-251, 253-264, 267  
Submitted 12/8: TSRQ39, 64, 67, 76, 77, 79, 89, 95, 97, 113, 114-116, 119, 121, 122, 126, 127, 129, 132, 134, 135, 137, 140, 142, 144, 145, 148, 151, 158, 159, 161-163, 166, 169, 170-176, 180, 185, 187, 188, 191-195, 202, 209, 211, 212, 219-221, 243, 252  
Submitted 12/12: TSRQ4, 36, 38, 41, 61, 66, 80, 81, 82, 86, 90, 94, 120, 124, 125, 136, 178, 181, 182, 197, 198, 199, 238  
Submitted 12/13: TSRQ35, 63, 65, 72, 73, 78, 88, 91-93, 96, 98, 99, 100, 110, 111, 118, 123, 130, 131, 133, 138, 139, 143, 146, 147, 149, 157, 164, 165, 167, 168, 177, 179, 184, 186, 189, 190, 200, 201, 203-207, 210, 213, 215, 216, 218, 240  
Submitted 12/14: TSRQ83, 84, 85, 107, 108, 112, 196  
Revised TSRQ98, 99  
Submitted 12/22: TSRQ34, 71, 101-106, 109, 141  
Revised TSRQ98, 99, 107  
Submitted 2/16: TSRQ320  
Submitted 2/23: TSRQ270  
Revised TSRQ4  
Submitted 3/7: TSRQ275, 279, 280, 284, 286, 289, 290, 292, 294-296, 298, 299, 305, 307, 311, 312, 314, 317  
Revised TSRQ34, 50, 61, 63, 73, 77, 80, 86, 88, 91, 92, 94, 113, 116, 118, 120, 122, 124, 129, 138, 139, 158, 169, 176, 189, 190, 192, 193, 195, 198, 213, 215, 218, 238, 261  
Submitted 3/11: TSRQ277, 281, 282

**STATUS OF RESPONSES TO  
GROUP A & B AND REVISION 3 QUESTIONS  
PADUCAH GASEOUS DIFFUSION PLANT**

**Technical Safety Requirements (cont'd)**

Submitted 3/13: TSRQ276, 297, 306, 313, 315  
Revised TSRQ66, 78, 90, 157, 170, 194, 197, 200, 201, 203, 206, 207, 209, 210,  
212, 215, 232, 243, 245

Revised 3/20: TSRQ310  
Revised TSRQ38, 119, 136, 165, 180, 181, 182, 204, 233

Submitted 3/27: TSRQ288, 293, 300, 304  
Revised TSRQ29, 41, 76, 84, 98, 103, 149, 175, 239, 240, 242, 276

Submitted 4/4: TSRQ271, 272, 273, 278, 309, 316, 318  
Revised TSRQ57, 83, 96, 115, 174, 196, 241, 253

Submitted 4/11: TSRQ291, 302, 303  
Revised TSRQ79, 81, 82, 284

Submitted 4/17: TSRQ269  
Revised TSRQ65, 71, 97, 136, 142, 244

Submitted 4/18: TSRQ274, 285, 287

Submitted 4/25: TSRQ319  
Revised TSRQ269, 274

Submitted 4/26: TSRQ283, 301  
Revised TSRQ30

Submitted 5/2: Revised TSRQ30, 33, 285, 301

Submitted 5/16: TSRQ308

Submitted 5/22: Revised TSRQ308

Submitted 5/31: Revised TSRQ4, 34, 36, 55, 96, 98, 103, 108, 114, 136, 175, 179, 196, 267, 269,  
271, 273, 280, 283-285, 290, 291, 298, 303-305 and 318

Submitted 6/27: Revised TSRQ319

Working: TSRQ321-376  
Revision to TSRQ241

**2.0Q15**

PGDP, page 2.1-2.

Add a sentence to clarify that some buildings contain areas that are released.

**Response:**

SAR Section 2.1.2 will be revised.

**Application Revision:**

The second paragraph, fourth through last sentences, of SAR Section 2.1.2 will be replaced with the following:

Figure 2.1-3 depicts PGDP's major buildings and structures. As shown in this figure, the site consists of facilities and areas leased to USEC, and facilities retained by DOE (i.e., non-leased). Activities conducted within facilities leased to USEC, excluding non-leased facilities and access and egress thereto, are conducted in accordance with this Application. Also, activities conducted by USEC and its agents in areas within the perimeter fence, excluding non-leased areas and access and egress thereto, will also be conducted in accordance with this Application. DOE will self-regulate DOE activities conducted in non-leased areas and leased areas in accordance with applicable DOE requirements. Table 2.1-1 and 2.1-1A lists buildings and structures leased to USEC and those retained by DOE as shown in the lease agreement as of August 1, 1995. Figure 2.1-4 depicts the USEC-leased versus DOE-retained buildings and structures. There are areas where contamination exists within the limited access and site boundary due to legacy DOE activities. Radiation Protection maintains listings of currently identified areas.