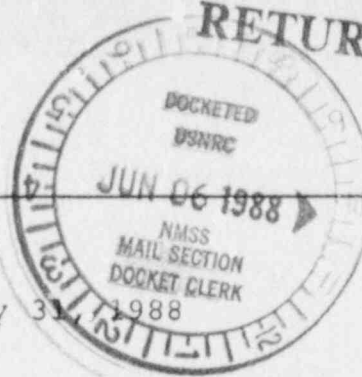




B&W Fuel Company

An American Company With
Worldwide Resources

May 31 1988



P.O. Box 11646
Lynchburg, VA 24506-1646
(804) 522-6000



Mr. Leland C. Rouse, Chief
Fuel Cycle Safety Branch
Division of Fuel Cycle, Medical, Academic, and
Commercial Use Safety
United States Nuclear Regulatory Commission
Washington, D. C. 20555

REFERENCES: (1) SNM-1168, Docket 70-1201
(2) Letter from J. T. Ford to R. G. Page, dated
1/28/83
(3) Letter from J. T. Ford to R. G. Page, dated
2/22/83
(4) Letter from J. P. Watters to W. T. Crow, dated
3/6/87

Gentlemen:

The B&W Fuel Company, Commercial Nuclear Fuel Plant is planning to shut down fuel fabrication activities this summer due to reactor reload schedules. The start and duration of the shutdown period is dependent on the receipt of a fuel assembly download contract for Dairyland Power's Lacrosse reactor. If we receive the contract, the shutdown period will be from August 9 through September 9 inclusive. If we do not receive the contract, the shutdown period will be from July 9 through September 9 inclusive.

During the shutdown period, we plan to do no fabrication work or movement of SNM, except that fuel assemblies may be shipped to customer sites or received at the CNFP. The fuel assembly shipments and receipts will be handled in accord with our license. In addition, we will continue to perform maintenance on our ECHO-330 system during the shutdown period.

There will be non-SNM work continuing in plant during the shutdown period, and as such there will be a crew of authorized B&W Fuel Company employees present (including management and necessary Health-Safety personnel) during normal working hours.

Since the plant status with regard to SNM will be that of a storage facility, we request approval of the license exemptions and modifications listed in Attachment I to this letter, for the shutdown period. We have kept the ECHO-330 controls and requirements intact (Section V, Pages 67-75) due to its operational status during the shutdown period.

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PDR ADOCK 07001201
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License Fee Information
on next page

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24382

Mr. Leland C. Rouse
Page 2
May 31, 1988

In the unforeseen event that it should become necessary to initiate activities including SNM (other than fuel assembly shipments or receipts), we will send a written notification of renewed licensed activity to the NRC Fuel Cycle Safety Branch and to NRC Region II prior to, or within one working day of the start of the activity. The notification shall include the start date of the activity, anticipated duration of the activity, and the type of activity. A cleanup and survey will be performed and recorded after each such activity, with records maintained for subsequent NRC inspection.

In Attachment I, we indicate a number of exemptions and modifications that are referenced to the applicable part of Section V. Many of these license requirements are given as daily, weekly, and monthly, etc. For these cases, the requested change is indicated immediately after the existing frequency requirement. A line is drawn through the existing requirement to show what we are requesting (i.e., ~~weekly~~/monthly indicates we want to change from a weekly to a monthly frequency).

If such activity during the shutdown period should become necessary, all quarterly license commitments, which would normally fall in the shutdown period, all monthly license commitments for that or each month, all weekly license commitments for that or each week, and all daily commitments for that or each day during which the activity takes place shall be performed.

These changes are the same as that requested for the June 15, 1987 to August 31, 1987 shutdown (see Reference 4 noted above).

If questions arise during your review, please feel free to call me at (804) 522-6202.

A check for \$150.00 is included with this letter to cover the administrative licensing fee.

Thank you for your prompt attention to this request.

Log	June 88-2
Rev	
Class	605736
Am	*150-
Fee	(\$1K 12 26 34)
Type	Amendment
Date	6/2/88
Date Completed	7/8/88
By	Jackson

Sincerely,

B&W FUEL COMPANY
COMMERCIAL NUCLEAR FUEL PLANT

J. P. Watters

J. P. Watters
License & Control Administrator

JPW:cmr

Attachments

ATTACHMENT I

We request a license condition approving the following license exemptions and modifications for the shutdown period.

SNM-1168
Section V
Part

- | | | |
|----------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----|
| 6.2 | The calendar year 1988 retraining of radiation workers shall be conducted when the workers return to work after the end of the shutdown period. | * |
| 6.6 | Health-Safety personnel shall conduct, at least weekly /monthly, a formal audit of plant status relative to nuclear and radiological safety, except during plant shutdown of a week or longer. | ** |
| 8.1.1(A) | Differential pressure shall be checked weekly /quarterly and filters replaced when damage is evident, or when the differential pressure exceeds 4 inches of water. | ** |
| 8.1.1(B) | Gaseous effluents shall be representatively sampled on a continuous basis, and when the facilities are in operational status, the samples shall be collected daily /weekly and counted after allowing for decay of radon and its daughters. | ** |
| 8.2.2 | Exemption from performing weekly measurement of glovebox negative pressure, hood face velocities, and elephant trunk velocities. | * |
| 8.2.3 | Exemption from collecting daily samples at work stations and periodic lapel samples. | * |

ATTACHMENT I

SNM-1168
Section V
Part

8.4.5	Area	Action Level	Survey Frequency
1.	Controlled pellet fabrication/rod loading change room (hot area)	Removable: 5,000 DPM/100 cm ² Total 50,000 DPM/50 cm ²	weekly/ ** monthly
2.	Change Room (Inter-mediate)	Removable: 500 DPM/100 cm ² Total 2,000 DPM/50 cm ²	daily/ ** weekly
3.	Clean (Remainder of plant and office area)	Removable: 200 DPM/100 cm ² Total 500 DPM/50 cm ²	monthly/ ** not done

8.4.5 Tours shall be made according to our Security Plan.

**

SNM-1168
Section VI

Need: The CNFP Emergency Response Organization shall remain intact during the planned shutdown. However, the Emergency Team may need to be supplemented by NNFD and/or NNFD-RL Emergency Team personnel. If this is necessary, the supplemental Emergency Team personnel shall receive CNFP specific training and will be under the control of the Emergency Officer in the event their assistance is required.

Request: We request approval of our plan to utilize NNFD and/or NNFD-RL Emergency Team personnel to supplement the CNFP Emergency Team during this shutdown period.

DOCKET NO. 70-1201
CONTROL NO. 24382
DATE OF DOC. May 31, 1988
DATE RCVD. June 6, 1988
FCUF ☒ PDR ☒
PCAF ☐ LPDR ☐
I & E REF. ☒
SAFEGUARDS ☒
OTHER ☐
DATE 6/6/88 INITIAL Enc