

Mr. James H. Miller  
Vice President, Production  
U. S. Enrichment Corporation  
2 Democracy Center  
6903 Rockledge Drive  
Bethesda, MD 20817

September 15, 1998

SUBJECT: COMPLIANCE PLAN ISSUE 3, ACTION 9, ASME CODE INTERPRETATION AND  
ASSESSMENT RESULTS REQUEST FOR ADDITIONAL INFORMATION --  
PORTSMOUTH AND PADUCAH GASEOUS DIFFUSION PLANTS  
(TAC NOS. L32095 AND L32093)

Dear Mr. Miller:

This refers to your Portsmouth Gaseous Diffusion Plant (PORTS) and Paducah Gaseous Diffusion Plant (PGDP) "Response to Request for Additional Information - Compliance Plan Issue 3, Action 9, ASME Code Interpretation and Assessment Results," letters dated August 14, 1998, and August 21, 1998, respectively.

Our review of your submittals has identified additional information that is needed for us to complete our review. ASME Code Case 2211, Items (c) and (d), specifically ask for descriptions of all credible operating and upset scenarios and analysis showing the maximum pressure which can result from each scenario. To address this condition, USEC points the NRC staff to various applicable accident scenarios contained in the Chapter 4 of both the proposed SAR-PORTS and the proposed SAR-PGDP, dated October 31, 1997. In Section 4.3.2.2.2, "Autoclave Steam Control Valve Fails Open (Pressure Increase)" and Section 4.3.2.2.14, "Cylinder Failure Inside Autoclave (Primary System Integrity)," USEC references analyses that specify how maximum allowable working pressures for the UF<sub>6</sub> cylinder and autoclave would not be exceeded for the respective scenarios. The NRC requests the referenced analyses be submitted in order to make a determination that there exists adequate overpressure protection by system design in lieu of a pressure relief device as required by ASME Section VIII, Boiler and Pressure Vessel Code. Please indicate any differences in the analyses between Portsmouth and Paducah pertaining to this issue.

Please provide the additional information within 10 days of this letter. Future correspondence should reference TAC Nos. L32095 and L32093, for PORTS and PGDP, respectively. If you have any questions regarding this matter, please contact me at (301) 415-8113.

Sincerely,

**Original Signed By**

Yawar H. Faraz, Project Manager  
Enrichment Section  
Special Projects Branch  
Division of Fuel Cycle Safety  
and Safeguards, NMSS

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cc: Mr. Steve Toelle, USEC  
Mr. Morris Brown, PORTS  
Mr. Howard Pulley, PGDP  
Mr. Randall DeVault, DOE-OR

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