



September 18, 1998
GDP 98-0197

Dr. Carl J. Paperiello
Director, Office of Nuclear Material Safety and Safeguards
Attention: Document Control Desk
United States Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Paducah Gaseous Diffusion Plant
Docket No. 70-7001
Compliance Plan Issue 36 - Transmittal of Revision 2 of the Updated Seismic Hazard Analysis for NRC Approval (TAC No. L32054)

Dear Dr. Paperiello:

The purpose of this letter is transmit the following document for NRC approval:

"Updated Probabilistic Seismic Hazard Analysis for the Paducah Gaseous Diffusion Plant, Paducah, Kentucky" Final Report, (Revision 2), Risk Engineering, Inc., September 18, 1998.

In a letter dated May 13, 1998 (Reference 1), the NRC requested additional information to complete its review of the seismic hazard re-analysis performed by Risk Engineering, Inc. (REI) that was originally submitted to the NRC on December 1, 1997 and revised on March 6, 1998 (References 2 and 3, respectively). On May 18-19, 1998, a meeting was held in REI's offices in Boulder, Colorado to discuss the NRC's information request. As part of that meeting, the NRC identified several problems with the analysis documentation prepared by REI and its subcontractors. These problems were discussed at the meeting and are further described in the NRC's June 2, 1998 meeting summary (Reference 4). Related deficiencies were also identified by PGDP Engineering personnel.

Subsequently, on June 8-10, 1998, the PGDP Engineering and Safety, Safeguards, and Quality organizations conducted a detailed surveillance in REI's offices of all work performed in support of the project. Deviations from procedural requirements were identified and corrective actions were implemented. PGDP plant personnel have worked closely with REI and its subcontractors to ensure that Revision 2 of the REI seismic hazard analysis and the supporting documentation comply with the USEC Quality Assurance Program Description and implementing procedures.

The enclosed Revision 2 of the seismic risk analysis completes USEC's response to the NRC's May 13, 1998 questions. Based on discussions with Mr. Drew Persinko of your staff, it is our

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understanding that the NRC would like to arrange a visit to REI to review the corrected analysis documentation. Please contact Steve Routh at (301) 564-3251 to arrange for the visit.

Should you have further questions related to this subject, please contact Steve Routh at (301) 564-3251. There are no new commitments contained in this submittal.

Sincerely,

S. D. Routh for

Steven A. Toelle
Nuclear Regulatory Assurance and Policy Manager

- References:
1. Letter from Mr. Robert C. Pierson (NRC) to Steven A. Toelle (USEC), "Paducah Gaseous Diffusion Plant Seismic Hazard Analysis," U.S. Nuclear Regulatory Commission, Docket No. 70-7001, May 13, 1998.
 2. Letter from Steven A. Toelle (USEC) to Mr. Robert C. Pierson (NRC), "Compliance Plan Issue 36 - Transmittal of Updated Seismic Risk Analysis for NRC Approval," Letter No. GDP 97-0201, December 1, 1997.
 3. Letter from Steven A. Toelle (USEC) to Dr. Carl J. Paperiello (NRC), "Compliance Plan Issue 36 - Transmittal of Revision to Updated Seismic Hazard Analysis for NRC Approval," Letter No. GDP 98-0040, March 6, 1998.
 4. NRC Memorandum from Drew Persinko to Robert C. Pierson, "Meeting Summary - Paducah Seismic Hazard Study with U.S. Enrichment Corporation," June 2, 1998.

Enclosure: "Updated Probabilistic Seismic Hazard Analysis for the Paducah Gaseous Diffusion Plant, Paducah, Kentucky" Final Report, (Revision 2), Risk Engineering, Inc., September 18, 1998.

cc: Mr. Robert C. Pierson, NRC-HQ (w/1)
NRC Region III Office (w/1)
NRC Resident Inspector, PGDP (w/1)
NRC Resident Inspector, PORTS (w/o)
Mr. Randall M. DeVault, DOE (w/1)