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October 31, 1997

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

SERIAL: GDP 97-0187

Paducah Gaseous Diffusion Plant (PGDP)
Portsmouth Gaseous Diffusion Plant (PORTS)
Docket Nos. 70-7001 and 70-7002
Submittal of Plan for Update of Safety Analysis Report (SAR) Chapter 3

Dear Dr. Paperiello:

In accordance with the commitment contained in the United States Enrichment Corporation (USEC) letters GDP 97-0147 and GDP 97-0148 to the Nuclear Regulatory Commission (NRC) dated August 18, 1997, USEC has completed the preparation of a detailed plan of action and schedule for updating Chapter 3 of the Paducah and Portsmouth Safety Analysis Reports (SARs). USEC's plan includes the creation of a dedicated team managed by a full-time project manager in a dual plant effort beginning on November 3, 1997.

Key milestones in the project schedule are provided below for information. USEC will periodically update the NRC regarding the status of the SAR Chapter 3 update effort.

Key Milestone	Scheduled Completion Date
Develop a detailed plan and schedule	Complete
Project Start	November 3, 1997
Form Project Team	November 5, 1997
Prepare Writer's Guide	December 11, 1997
Draft 3 sample sections	March 31, 1998
Meet with NRC to review sample sections	April 15, 1998
Complete remaining sections	September 29, 1999
PORC approval of updated SAR Chapter 3	October 31, 1999

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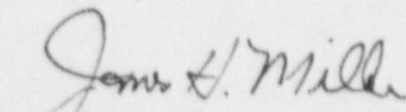
As identified in USEC letters GDP 97-0147 and GDP 97-0148, the update project will:

- Identify structures, systems, components (SSCs) and processes to be described in SAR Chapter 3 to support the accident analysis.
- Develop an outline of the new SAR Chapter 3. For planning and writer assignment purposes, the new SAR Chapter 3 has been preliminarily divided into 28 sections.
- Establish the level-of-detail and subsection breakdown. This will be accomplished through the development of a writer's guide and will be designed to provide a level of detail that is commensurate with the importance of the SSC or process to safety and the hazards and accident analysis. Existing industry guidance such as regulatory guides and SARs for reactor and fuel cycle facilities will be considered in establishing the appropriate level of detail. The writer's guide and project instructions will define methods to be used for validation of the updated SAR Chapter 3 information through field walk-downs and document reviews and will define standards for preparation of the revised SAR Chapter 3 sections.

USEC has devoted considerable effort to planning a project that provides a high degree of quality and assurance of accuracy within a reasonable schedule. Once the SAR Chapter 3 update is complete on October 31, 1999, the effort will continue to include resolution of any identified differences between the updated SAR Chapter 3 and the other sections of the SARUP (reference letters GDP 97-0188 and GDP 97-0189). This will include activities to update, as necessary, the SARUP supporting documents such as the Design Analysis and Calculations (DACs), Plant Safety Operational Analyses (PSOAs), and other related design documents or programs. USEC will make the necessary changes to the SARUP supporting documents and the SARUP submittal by no later than October 31, 2000 as stated in USEC letters GDP 97-0147 and GDP 97-0148.

USEC would like to schedule a meeting with NRC to present the detailed plan of action and schedule for the SAR Chapter 3 update, and will contact your staff to arrange the meeting. There are no new commitments made in this letter. Any questions regarding this matter should be directed to Steve Routh at (301) 564-3251.

Sincerely,


James H. Miller
Vice President, Production

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