November 7, 1997

Mr. Randall M. DeVault
Regulatory Oversight Manager
Office of Assistant Manager
for Enrichment Facilities
U.S. Department of Energy, EF20
P.O. Box 2001
Oak Ridge, TN 37831

Dear Mr. DeVault:

In accordance with the recent Memorandum of Understanding and per discussions between our staffs, we are forwarding the attached certificate amendment request (CAR) regarding Issue 24 of the Portsmouth Compliance Plan (DOE/ORO-2027/R3, "Plan for Achieving Compliance with NRC Regulations at the Portsmouth Gaseous Diffusion Plant") dated October 21, 1997. The CAR is requesting a date change for completion of a Plan of Action and Schedule item from Issue 24. Please review and advise us whether or not DOE approves the requested date change.

You may inform us of your decision on this matter by contacting Yawar Faraz at (301) 415-8113.

Sincerely,

Original Signed By

Robert C. Pierson, Chief
Special Projects Branch
Division of Fuel Cycle Safety
and Safeguards, NMSS

NJFS 1/1

Docket 70-7002
Certificate GDP-2

NRC FILE CENTER COPY

Enclosure: CAR dated 10/21/97

Distribution: (TAC No: L32051, Control No: 200S)
Docket 70-7002 NRC FILE CENTER PUBLIC PHiland,RIII
DHartland,RIII WSchwink,FCOB KWinsberg,OGC SPB r/f FCSS r/f

OFC	SPB		SPB		SPB		SPB	C	SPB	C		
NAME	*CCox:lj				*DHoadley		DMartin		RPierson	for		
DATE	/ /97		/ /97		/ /97		11/6/97		11/6/97		/ /97	

C = COVER E = COVER & ENCLOSURE N = NO COPY

G:\devault.cox OFFICIAL RECORD COPY

* See Previous Concurrence

Mr. Randall M. DeVault
Regulatory Oversight Manager
Office of Assistant Manager
for Enrichment Facilities
U.S. Department of Energy, EF20
P.O. Box 2001
Oak Ridge, TN 37831

Dear Mr. DeVault:

In accordance with the pending Memorandum of Understanding and per discussions between our staff, we are forwarding the attached certificate amendment request (CAR) regarding Issue 24 of the Portsmouth (PORTS) Compliance Plan (DOE/ORO-2027/R3, "Plan for Achieving Compliance with NRC Regulations at the Portsmouth Gaseous Diffusion Plant") dated October 21, 1997. The CAR is requesting a date change for completion of a Plan of Action and Schedule item from Issue 24. Please review and indicate whether or not DOE would support the requested date change.

Please inform us of your decision on this matter by contacting Yawar Faraz at (301) 415-8113.

Sincerely,

Robert C. Pierson, Chief
Special Projects Branch
Division of Fuel Cycle Safety
and Safeguards, NMSS

Docket 70-7002
Certificate GDP-2

Enclosure: CAR dated 10/21/97

Distribution: (TAC No: L32051, Control No: 2005)
Docket 70-7002 NRC FILE CENTER PUBLIC PHiland,RIII YFARAZ
DHartland,RIII WSchwink,FCOB KWinsberg,OGC SPB r/f FCSS r/f

OFC	SPB		SPB		SPB	C	SPB		SPB			
NAME	CCox:ij				DHoadley		DMartin		RPierson			
DATE	11/14/97		/ /97		11/17/97		/ /97		/ /97		/ /97	

C = COVER E = COVER & ENCLOSURE N = NO COPY

G:\devault.cox OFFICIAL RECORD COPY

United States
Enrichment Corporation

2 Democracy Center
6903 Rockledge Drive
Bethesda, MD 20817

Tel: (301) 564-3200
Fax: (301) 564-3201

USEC

JAMES H. MILLER
VICE PRESIDENT, PRODUCTION

Dir: (301) 564-3309
Fax: (301) 571-8279

October 21, 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-97-0180

Portsmouth Gaseous Diffusion Plants (PORTS)
Docket No. 70-7002
Certificate Amendment Request - Calibration Program for Measuring and Test Equipment

Dear Dr. Paperiello:

In accordance with 10 CFR 76.45, the United States Enrichment Corporation (USEC or Corporation) hereby submits a request for amendment to the certificate of compliance for the Portsmouth, Ohio Gaseous Diffusion Plant (PORTS). This certificate amendment request revises the Plan for Achieving Compliance with NRC Regulations at the Portsmouth Gaseous Diffusion Plant (Compliance Plan), Issue 24, to delete the implication that measuring and test equipment (M&TE) are categorized by Q, AQ, and AQ-NCS. Those M&TE which are used on Q, AQ, and AQ-NCS equipment are qualified for use on equipment of the highest quality level (i.e., Q) and may be used on any of the three categories. It also corrects an inconsistency within Compliance Plan Issue 24 regarding the completion date for revising the calibration program procedures and training to meet more formal requirements for AQ SSCs by revising the subject completion date to June 30, 1998. The revised date matches dates given elsewhere in Issue 24 for upgrading the work control process and preventive maintenance program for other AQ items, and also matches the Paducah, Kentucky Gaseous Diffusion Plant (PGDP) commitment dates for similar actions.

Enclosure 1 to this letter provides a detailed description and justification for the proposed changes to Compliance Plan Issue 24. Enclosure 2 is a copy of the revised Compliance Plan pages and removal/insertion instructions associated with this request. Enclosure 3 contains the basis for USEC's determination that the proposed change associated with this certificate amendment request is not significant.

9710270146 13pp

Since this certificate amendment request is not required to support continued plant operation, but is associated with a Compliance Plan action that is currently scheduled to be complete by December 31, 1997, USEC requests NRC review and approval of this certificate amendment request by December 31, 1997. The amendment should become effective immediately upon approval by NRC.

Any questions related to this subject should be directed to Mr. Mark Lombard at (301) 564-3245. New/revised commitments contained in this submittal are provided in Enclosure 4.

Sincerely,

James H. Miller
Vice President, Production

Enclosures: As stated

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

OATH AND AFFIRMATION

I, James H. Miller, swear and affirm that I am Vice President, Production, of the United States Enrichment Corporation (USEC), that I am authorized by USEC to sign and file with the Nuclear Regulatory Commission this Certificate Amendment Request for the Portsmouth Gaseous Diffusion Plant, that I am familiar with the contents thereof, and that the statements made and matters set forth therein are true and correct to the best of my knowledge, information, and belief.

James H. Miller

On this 21st day of October, 1997, the officer signing above personally appeared before me, is known by me to be the person whose name is subscribed to within the instrument, and acknowledged that he executed the same for the purposes therein contained.

In witness hereof I hereunto set my hand and official seal.

Laurie M. Knisley, Notary Public
State of Maryland, Montgomery County
My commission expires March 17, 1998

United States Enrichment Corporation (USEC)
Proposed Certificate Amendment Request
Calibration Program for Measuring and Test Equipment
Detailed Description of Change

The proposed changes involve the PORTS Compliance Plan Issue 24, Plan of Action and Schedule. Specifically, on page 4, the fifth bullet paragraph is proposed to be revised as follows:

> Revise the measuring and test equipment and process equipment calibration programs to meet the more formal requirements. The scheduled completion dates for these actions are December 31, 1996, for Q SSCs ~~measuring and test equipment~~, February 28, 1997, for AQ-NCS SSCs ~~measuring~~ ~~and test equipment~~, and June 30, 1998, ~~December 31, 1997~~, for other AQ SSCs ~~measuring and test equipment~~.

The proposed change will delete the implication that measuring and test equipment (M&TE) are categorized by Q, AQ, and AQ-NCS. Those M&TE which are used on Q, AQ, and AQ-NCS equipment are qualified for use on equipment of the highest quality level (i.e., Q) and may be used on any of the three categories of safety related equipment (Q, AQ, and AQ-NCS). It also corrects an inconsistency within Issue 24 regarding the date for revising the calibration program to meet more formal requirements for AQ SSCs by revising the subject completion date to June 30, 1998. The revised date matches dates given elsewhere in Issue 24 for upgrading the work control process and preventive maintenance program for other AQ items, and also matches the Paducah Gaseous Diffusion Plant commitment dates for similar work.

On page five of Compliance Plan Issue 24, the following change is proposed in the first bullet:

- Develop and implement individual calibration procedures for Q, AQ-NCS, and other AQ SSCs and for M&TE.

This change is being proposed to indicate that detailed calibration procedures are developed to control M&TE as well as the Q, AQ-NCS, and other AQ SSCs.

Proposed Certificate Amendment Request Portsmouth Gaseous Diffusion Plant Letter GDP 97-0180 Removal/Insertion Instructions	
Remove Pages	**Insert Pages**
Plan for Achieving Compliance with NRC Regulations at the Portsmouth Gaseous Diffusion Plant	
Issue 24 Pages 3/4, 5/6	**Issue 24** Pages 3/4, 5/6

In addition, the maintenance organizations have initiated special provisions and interim commitments for the safety systems. These provisions, which are now in place and are incorporated into existing procedures, and will be incorporated into new procedures as they are developed, include the following actions:

1. A work package is prepared prior to commencement of any corrective maintenance work on safety systems. The minimum requirements of a work package for safety system maintenance include: a maintenance service request, a planning checklist, written work instructions, and a safety system data sheet, which provides verification of post-maintenance testing. Depending on the scope of the work, the package may also include equipment specific procedures or checklists and quality control inspection, nuclear criticality safety analysis, radiation protection, OSHA, or operational requirements. The composition of a work package is dependent on the maintenance to be performed and is defined in the work control procedure.

2. Systems engineers have been assigned specific responsibility for the technical aspects of designated safety systems. The systems engineers provide technical support for maintenance activities of these systems, including assistance in work package preparation, determination of post-maintenance test requirements, observation of surveillance testing, review of procedures, and input to the plant preventive maintenance program. Systems engineers are required to have an engineering education or an appropriate technical background and a basic knowledge of plant systems, principles of gaseous diffusion, administrative procedures and policies, plant layout and location of components of assigned systems, technical specifications, and in-service inspection requirements.

Interim Regulatory Commitments

The following commitments derived from the ROA requirements will remain in effect until replaced by Application commitment implementation.

1. A corrective maintenance program shall be implemented to ensure that prompt and effective maintenance is performed on malfunctioning nuclear safety systems, safeguards, and security equipment.

2. A preventive maintenance program shall be implemented to ensure the operability of nuclear safety systems, safeguards, and security equipment.

3. A documented instrument calibration program, employing standards traceable to the national standards system or to nationally accepted standards, shall be implemented for the calibration of equipment and monitoring devices necessary for the proper maintenance and operation of nuclear safety systems and safeguards equipment.

4. Controls shall be established to ensure safety systems are not disabled or diminished by planned activities.

5. Work on safety systems shall be controlled and performed with the use of approved procedures and/or work instructions. The procedures and work instructions shall be based upon established and well-recognized codes and standards in applicable areas such as welding,

electrical, piping, and instrumentation. As applicable, codes and standards shall be identified in the procedures as source references.

PLAN OF ACTION AND SCHEDULE

The actions required to complete the maintenance program are the following:

- Develop and implement a maintenance history program. The scheduled completion date for this action is September 30, 1997.

  - Develop a master equipment list for safety critical equipment.
  - Implement a new computer-based maintenance management system with the capability to collect and trend the data.

- Develop guidance for cleanliness control and measures to prevent entry of extraneous material into a closed system. The scheduled completion date for this action is July 31, 1996.

- Upgrade the current work control process to provide the committed level of planning and work package development for Q, AQ-NCS, and other AQ items. The scheduled completion dates for these actions are February 28, 1997, for AQ-NCS items; April 30, 1997, for Q items; and June 30, 1998, for other AQ items.

  - Centralize all planning and work control functions in the Work Control organization. (Complete)
  - Revise the work control procedure.
  - Develop and provide training on the upgraded work control process.

- Upgrade the preventive maintenance program to meet the commitments for greater formalism. The scheduled completion dates for these actions are February 28, 1997, for AQ-NCS items; March 31, 1997, for Q items; and June 30, 1998, for other AQ items.

  - Develop an overall performance indicator to measure preventive maintenance effectiveness.
  - Identify current preventive maintenance performed on Q, AQ-NCS, and other AQ items.
  - Revise the preventive maintenance program procedure to establish a formal mechanism to justify and document changes to Q, AQ-NCS, and other AQ item requirements.
  - Develop the technical/historical basis for use in evaluating preventive maintenance task adequacy.

- Revise the measuring and test equipment and process equipment calibration programs to meet the more formal requirements. The scheduled completion dates for these actions are December 31, 1996, for Q SSCs; February 28, 1997, for AQ-NCS SSCs; and June 30, 1998, for other AQ SSCs.

  - Implement procedures that define and control the overall measuring and test equipment program. (Complete)

- Develop and implement individual calibration procedures for Q, AQ-NCS, and other AQ SSCs and for M&TE.
- Provide training on calibration requirements to affected coordinators, managers, technicians, and users.

- Identify the procedural deficiencies for performing corrective maintenance, preventative maintenance, calibration, and surveillance testing of Q, AQ-NCS, and other AQ SSCs, and develop a composite listing of the procedures requiring revision, development, or conversion. The scheduled completion dates for these actions are October 31, 1996, for Q SSCs; January 31, 1997, for AQ-NCS SSCs; and October 31, 1997, for other AQ SSCs.

- Develop procedures and provide the associated training of appropriate personnel for the performance of surveillance tests which are required to support Technical Safety Requirements. This action will be completed prior to the NRC assuming regulatory authority.

- Revise, develop, or convert corrective maintenance, preventive maintenance, calibration, and surveillance test procedures for Q, AQ-NCS, and other AQ SSCs. The scheduled completion dates for these actions are February 28, 1997, for AQ-NCS items; March 31, 1997, for Q items; and June 30, 1998, for other AQ items.

- Develop training materials for the work control, surveillance testing, instrument calibration, and corrective and preventive maintenance procedures and provide the associated training of appropriate personnel. The scheduled completion dates for these actions are February 28, 1997, for AQ-NCS items; March 31, 1997, for Q items; and June 30, 1998, for other AQ items.

- Identify and control the vendors' manuals used for maintenance of Q equipment, including entering them into the document control and records management system. The scheduled completion date for this action is March 31, 1997.

  - Identify vendor manuals used for maintenance activities of Q equipment.
  - Verify appropriate vendors' manuals for accuracy and completeness.
  - Enter vendor manual data into the records management and document control system.

The procedure upgrades and associated training to address this area of the noncompliance will be completed in coordination with the plans and schedules set forth in the Compliance Plan issues "Procedures Program" and "Systems Approach to Training."

SUMMARY OF REQUIREMENTS, COMMITMENTS, AND NONCOMPLIANCES

Issue: Maintenance Program	
Code of Federal Regulations	**Part**
Title 10	76.87(c)(7)
Application Commitment	**Section**
Safety Analysis Report	3.5.1, 5.3.5, 5.6.5, 5.6.5.1, 5.6.5.2, 5.6.5.3, 5.7.3, 5.7.3.2, 5.7.3.4, 5.7.3.5, 6.1.1, 6.1.1.9, 6.1.1.11, 6.1.1.14, 6.1.1.20, 6.1.1.25, 6.3.5.2.3.6, 6.3.5.2.4.2, 6.3.5.4.2, 6.3.5.6, 6.3.5.7, 6.4, 6.5.7, 6.6.1, 6.6.3, 6.6.3.1, 6.6.5, 6.6.13, 6.8.2.2, 6.8.2.3, 6.8.2.4, 6.10.1.13, 6.11.1, 6.11.5, 6.11—Appendix A
Technical Safety Requirements	3.2.2.b, 3.9.1, 3.15, 3.24
Fundamental Nuclear Materials Control Plan	2.2.7, 2.6, 4.1, 4.1.1, 5.1.2, 5.2, 5.2.1, 5.2.3, 13.1
Emergency Plan	4.1.5, 7.6, 8.2
Quality Assurance Program	1–2.18, Appendix A
Application Noncompliance Statement	**Section**
Safety Analysis Report	6.4.13.1, 6.4.13.2, 6.4.13.3, 6.4.13.4, 6.4.13.5

United States Enrichment Corporation (USEC)
Proposed Certificate Amendment Request
Calibration Program for Measuring and Test Equipment
Significance Determination

The United States Enrichment Corporation (USEC) has reviewed the proposed changes associated with this certificate amendment request and provides the following Significance Determination for consideration.

1. No Overall Decrease in the Effectiveness of the Plant's Safety, Safeguards, or Security Programs.

   The proposed changes will delete the implication that measuring and test equipment (M&TE) are categorized by Q, AQ, and AQ-NCS. Those M&TE which are used on Q, AQ, and AQ-NCS equipment are qualified for use on equipment of the highest quality level (i.e., Q) and may be used on any of the three categories of safety related equipment (Q, AQ, and AQ-NCS). It also corrects an inconsistency within Issue 24 regarding the date for revising the calibration program to meet more formal requirements for AQ SSCs by revising the subject completion date to June 30, 1998, and to indicate that detailed calibration procedures are developed to control M&TE as well as the Q, AQ-NCS, and other AQ SSCs. The revised completion date matches dates given elsewhere in Issue 24 for upgrading the work control process and preventive maintenance program for other AQ items, and also matches the Paducah Gaseous Diffusion Plant commitment dates for similar work. None of the proposed changes affect the associated Justification for Continued Operation, which will be in effect until the actions are complete. Therefore, the proposed changes do not represent an overall decrease in the effectiveness of the plant's safety, safeguards, or security programs.

2. No Significant Change to Any Conditions to the Certificate of Compliance.

   No aspect of the Certificate of Compliance (COC) is affected by these changes. Therefore, no significant change to any conditions to the COC will result.

3. No Significant Change to Any Condition of the Approved Compliance Plan.

   The proposed changes do involve changes to the approved Compliance Plan, but as discussed in Item 1 above they are required for consistency in completion dates, to clarify that M&TE are not classified as Q, AQ-NCS, or AQ, and to indicate that detailed calibration procedures will be developed to control M&TE as well as the SSCs. None of the proposed changes affect the associated Justification for Continued Operation, which will be in effect until the actions are complete. Therefore, the proposed changes are not significant with respect to safety or to meeting the Compliance Plan schedules previously established, and do not represent a significant change to any condition of the approved Compliance Plan.

4. No Significant Increase in the Probability of Occurrence of Consequences of Previously Evaluated Accidents

The proposed changes are required for consistency in completion dates, to clarify that M&TE are not classified as Q, AQ-NCS, or AQ, and to indicate that detailed calibration procedures will be developed to control M&TE as well as the SSCs. None of the proposed changes affect the associated Justification for Continued Operation, nor do they have any affect on the probability of occurrence of accidents previously evaluated. Therefore, the proposed changes do not represent any increase in the probability of occurrence of consequences of previously evaluated accidents.

5. No New or Different Kind of Accident.

These changes do not introduce any new or different equipment or processes, nor do they involve a modification to existing equipment or operations. Therefore, they will not result in the possibility of a new or different kind of accident.

6. No Significant Reduction in Margins of Safety.

As described in Item 4 above, the probability and consequences of an accident are not affected. The factors which comprise the safety margin, the administrative controls and engineered safeguards, are not affected by these changes. None of the proposed changes affect the associated Justification for Continued Operation, which will be in effect until the actions are complete. Therefore, the proposed changes do not represent a reduction in any margin of safety.

7. No Significant Decrease in the Effectiveness of Any Program or Plan Contained in the Certification Application.

The proposed changes have no affect on the programs or plans contained in the Certification Application. Therefore, no decrease in the effectiveness of any of the programs or plans contained in the Certification Application will result.

8. The Proposed Changes do not Result in Undue Risk To 1) Public Health and Safety, 2) Common Defense and Security, and 3) the Environment

All M&TE used on SSCs will be qualified for use on equipment of the highest quality level (i.e., Q). The proposed changes do not increase the consequence or probability of an accident and, therefore, do not present an undue risk to the public. The proposed changes do not affect any common defense or security operations, therefore, no undue risk to common defense and security is presented. No undue risk to the environment is presented by the proposed changes because they do not affect accident scenarios or operations that could affect the environment. No additional environmental risk is presented because the changes have no impact on plant effluents or postulated accidents which might affect the environment. Therefore, the proposed

changes do not result in undue risk to the public health and safety, common defense and security, or the environment.

9. No Change in the Types or Significant Increase in the Amounts of Any Effluents That May Be Released Offsite

Since M&TE which are used on safety related equipment are always maintained for use on equipment of the highest quality level (i.e., Q), no affect on postulated plant accidents would result from the proposed changes. The proposed changes do not involve any process which would change or increase effluents that may be released by the plant. Therefore, there is no change in the types or any increase in the amounts of any effluents that may be released offsite.

10. No Significant Increase in Individual or Cumulative Occupational Radiation Exposure.

The proposed changes do not modify any process or equipment which would affect radiation exposure to any individual onsite. Therefore, no increase in individual or cumulative occupational radiation exposure would occur.

11. No Significant Construction Impact

These changes do not involve construction of any plant structure or system, nor will they affect any planned or existing construction project. Therefore, there is no construction impact.

12. No Significant Increase in the Potential for, or Radiological or Chemical Consequences from, Previously Analyzed Accidents.

The proposed changes do not involve any new or modified operation which would increase the potential for an accident or any associated consequences. Therefore, these changes will not increase the potential for, or radiological or chemical consequences from, previously analyzed accidents.

NEW/REVISED COMMITMENTS CONTAINED IN THIS SUBMITTAL

1. The measuring and test equipment *and process equipment* calibration programs will be revised to meet the more formal requirements as described in Compliance Plan Issue 24. The scheduled completion dates for these actions are December 31, 1996, for Q *SSCs* ~~measuring and test equipment~~, February 28, 1997, for AQ-NCS *SSCs* ~~measu ing and test equipment~~, and *June 30, 1998*, ~~December 31, 1997~~, for other AQ *SSCs* ~~measuring and test equipment.~~

2. Individual calibration procedures will be developed for Q, AQ-NCS, and other AQ SSCs *and for M&TE.*

Note: Additions are shown in italics and deletions are shown as strikeout text.