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IT-01

June 18, 1998
GDP 98-0125

Dr. Malcolm R. Knapp
Acting Director, Office of Nuclear Material Safety and Safeguards
Attention: Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Paducah Gaseous Diffusion Plant (PGDP)
Docket No. 70-7001
Compliance Plan Issue 36 - Updated Seismic Hazard Analysis (TAC No. L32054)

Dear Dr. Knapp:

In a letter dated May 13, 1998 (Reference 1), the NRC requested additional information to complete its review of the updated seismic hazard analysis performed by Risk Engineering, Inc. (REI) that was originally submitted to the NRC on December 1, 1997 and revised on March 6, 1998. 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 reviewed the supporting documents prepared by REI and its subcontractors and identified several problems with the analysis documentation. These problems were discussed at the meeting and are further described in the NRC's June 2, 1998 meeting summary (Reference 2). Related deficiencies were also identified by PGDP Engineering personnel.

In response to these documentation issues, during the week of June 8, 1998, an evaluation of REI's implementation of the USEC Quality Assurance Program and implementing procedures and a comprehensive review of the quality documentation associated with this project was conducted by members of the PGDP Engineering and Safety, Safeguards, and Quality organizations in REI's offices. Based on this review, additional problems with the analysis documentation have been identified.

PGDP personnel are currently working with REI to resolve all identified deficiencies and to make the necessary corrections to the analysis documentation. This effort will be completed by August 28, 1998. Based on resolving all identified deficiencies in the analysis documentation, USEC's responses to the NRC's May 13, 1998 questions will be submitted by August 28, 1998.

In addition to the above actions, by August 28, 1998, a review of current policies, practices, and procedures related to the control of subcontractors will be performed and any necessary changes identified.

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Should you have any questions related to this subject, please contact Steve Routh at (301) 564-3251. Commitments contained in this submittal are identified in the enclosure.

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. NRC Memorandum from Drew Persinko to Robert C. Pierson, "Meeting Summary - Paducah Seismic Hazard Study with U.S. Enrichment Corporation," June 2, 1998.

Enclosure: Commitments Contained in this Submittal

cc: Mr. Robert C. Pierson, NRC
NRC Region III Office
NRC Resident Inspector - PGDP
NRC Resident Inspector - PORTS

Commitments Contained in this Submittal

1. PGDP personnel are currently working with REI to resolve all identified deficiencies and to make the necessary corrections to the analysis documentation. This effort will be completed by August 28, 1998. Based on resolving all identified deficiencies in the analysis documentation, USEC's responses to the NRC's May 13, 1998 questions will be submitted by August 28, 1998.
2. By August 28, 1998, a review of current policies, practices, and procedures related to the control of subcontractors will be performed and any necessary changes identified.