

SAFETY EVALUATION REPORT

DOCKET: 70-3103

LICENSE: SNM-2010

LICENSEE: Louisiana Energy Services, LLC dba URENCO USA
Eunice, NM

SUBJECT: AMENDMENT 88, RELIEF FROM ANNUAL EVACUATION DRILL
(ENTERPRISE PROJECT IDENTIFICATION NUMBER L-2020-LLA-0274)

BACKGROUND

By e-mail dated December 16, 2020, (Agencywide Documents Access and Management System (ADAMS) Accession No. ML20356A060), Louisiana Energy Services (LES) requested relief from a license commitment to conduct an annual evacuation drill. The drill cannot be performed because New Mexico Public Health Orders limit the number of people that can gather in the assembly areas. LES is requesting that the drill be delayed until calendar year 2021.

DISCUSSION

License Condition 10.b requires the licensee to conduct authorized activities in accordance with the statements, representations, and conditions in its Safety Analysis Report (SAR). Chapter 5 of the SAR, Nuclear Criticality Safety, states the licensee is committed to following the guidelines in Regulatory Guide 3.71, "Nuclear Criticality Safety Standards for Nuclear Materials Outside Reactor Cores." The regulatory guide endorses Safety Standard ANSI/ANS-8.23, "Nuclear Criticality Accident Emergency Planning and Response." Section 8.3 of the standard states that evacuation drills shall be conducted at least annually.

Evacuation drills require workers to gather in assembly areas. In response to the COVID-19 pandemic, a New Mexico Public Health Order has limited gatherings to five persons or less. Conducting an evacuation drill would require more than five workers to gather in the assembly areas.

The request states that personnel are trained on their response to the criticality accident alarm system (CAAS). The 2019 CAAS evacuation drill was performed successfully. The request commits to provide a written criticality alarm refresher brief to all employees in lieu of the actual evacuation drill and document the training in the Learning Management System. An event report (EV 141291) has been written to document the cancellation of the 2020 evacuation drill, and track restoration of compliance. When the New Mexico Public Health Orders allow for gatherings of 10 or more persons, the evacuation drill will be scheduled for the 2021 calendar year.

The most recent inspection of the criticality safety program was documented in Inspection Report 70-3103/2020-001, dated April 24, 2020 (ADAMS Accession No. ML20115E452). No violations of more than minor significance were identified in the area of nuclear criticality safety.

After evaluating the request, the NRC staff concludes that worker proficiency in responding to CAAS alarms will not degrade significantly over the next year, and there will be no negative impacts to public health and safety related to the proposed change.

ENVIRONMENTAL REVIEW

The NRC staff determined that the proposed change to the commitment to perform an annual evacuation drill is procedural in nature. The temporary change will not impact any effluents, will not result in any changes to radiation exposures, does not have construction impacts, and does not increase the potential for radiological accidents. Therefore, the amendment to temporarily revise the commitment is categorically excluded from the requirements to prepare a site-specific environmental assessment consistent with Title 10 of the *Code of Federal Regulations* (10 CFR) Section 51.22(c)(11). In accordance with 10 CFR 51.22(d), neither an environmental assessment nor an environmental impact statement is warranted for this action.

CONCLUSION

The NRC staff concludes that the proposed change to the commitment to perform an annual evacuation drill is acceptable and provides reasonable assurance that adequate protective measures can and will be taken in the event of a criticality alarm. After December 31, 2021, approval of the change will expire and the commitment will return to an annual drill. The following condition has been added to the license:

34. Notwithstanding the requirements of License Condition 10.b, the commitment to perform an annual evacuation drill for the criticality alarm is temporarily changed from annual to biennial. The licensee shall implement the compensatory measures described in its December 16, 2020 relief request (ADAMS Accession No. ML20356A060). This condition will expire on December 31, 2021.

PRINCIPAL CONTRIBUTORS

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