



70-1257

August 24, 2022
JMD:22:009

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Office of Nuclear Security and Incident Response
One White Flint North
11555 Rockville Pike
Rockville, Maryland 20852-2738

Subject: Framatome Richland Facility Emergency Plan Version 16.0 Transmittal to USNRC Headquarters Document Control Desk

Gentlemen;

Enclosed is a CD-ROM that includes the latest revisions of the Framatome Richland Facility's Emergency Plan (E08-01-1.0), Emergency Plan Implementing Procedures (E08-03-X.XX), and Memoranda of Understanding (E08-04-X.XX). The document number designations "X.XX" are used to encompass all applicable document numbers, e.g. E08-03-1.1, E08-03-2.1, E08-03-3.11, etc. For your convenience, I have enclosed a document summary in hard copy. This summary includes a listing of folders, files, and document numbers and titles that are included on the CD-ROM. An electronic copy of the summary is included in the root directory of the disc.

Please destroy any previous copies of these documents that you still have on file.

10 CFR 70.32(i) requires emergency plan revisions to be furnished to the USNRC within six months after changes are made. On 02/28/2022, the Framatome Richland Emergency Plan (E08-01-1.0) was revised to version 16.0, which is the current revision. A nature of change listing and the electronic signature page is enclosed with this letter. Changes made in version 16.0 do not decrease the effectiveness of the plan. Therefore, USNRC pre-approval of version 16.0 is not required.

Additional copies are being sent to Framatome Richland's USNRC Project Manager, USNRC Region II, and the USNRC Senior Resident Inspector at Columbia Generating Station.

The facility emergency plan, implementing procedures, and memoranda of understanding are proprietary documents and Framatome requests that the NRC handle them as such. There are three implementing procedures that contain security-related sensitive information and should be protected from public disclosure similar to protecting proprietary information. The transmittal letter is not proprietary when the attachments are removed.

If you have questions regarding this transmittal, please contact me at (509) 375-8285 or via email at jeff.deist@framatome.com.

Very truly yours,

Jeffrey M. Deist, Emergency Preparedness Coordinator
Environment, Health, Safety & Licensing

Enclosure

Framatome Inc.
2101 Horn Rapids Road
Richland, WA 99354
Tel: (509) 375-8100

www.framatome.com

AX45
NSIRD1
NSIR
NMSS

AFFIDAVIT

STATE OF WASHINGTON)
 :
COUNTY OF BENTON) ss

Timothy J. Tate, being duly sworn on oath, states as follows:

1. I am employed by Framatome Inc. (Framatome) as Manager, Environmental, Health, Safety and Licensing in Richland, Washington. I am responsible for the overall administration of the safety programs at Framatome's Richland, Washington nuclear fuel fabrication facility, including regulatory licensing and permitting. This affidavit is based on my firsthand, personal knowledge and is submitted in my capacity as Manager, Environmental, Health, Safety and Licensing.

2. I am familiar with the content of the attached Facility Emergency Plan, Implementing Procedures, and Memoranda of Understanding. These documents have been classified and designated as "Proprietary" by Framatome in accordance with the document control system and policies established by Framatome for the control and protection of proprietary and confidential information. There are three Implementing Procedures (E08-03-8.8, E08-03-8.9, E08-03-8.10) that contain security-related sensitive information and have been designated as "Security-Related Information – Withhold Under 10CFR2.390".


3. Framatome is engaged in the business of designing and manufacturing nuclear fuel assemblies for commercial nuclear reactors. Within the United States, there are two additional firms that design and manufacture nuclear fuel for commercial nuclear reactors and there are several other companies outside of the United States that engage in the same business as Framatome. Competition among these companies including Framatome is fierce and manufacturing costs of the nuclear fuel are critical to the maintenance of market share and to the growth of market share among utility customers.

4. The Facility Emergency Plan, Implementing Procedures, and Memoranda of Understanding contain commercial information of a confidential nature that is not available in public sources or available to the public. This information is commercial and confidential because it:

- A. Reveals distinguishing aspects of Framatome's business which a competitor within the field of nuclear fuel manufacturing may adapt for their business plans, thereby gaining a competitive advantage to the disadvantage of Framatome.
- B. Reveals technical work performed by Framatome which a competitor could readily use without expenditure of funds and replicate this work thereby gaining a competitive advantage to the disadvantage of Framatome.

5. Framatome Inc. will suffer considerable competitive harm if the contents of the report are made available to Framatome domestic and international competitors.

Dated this 23 day of August 2022.



Timothy J. Tate
Manager, Environmental, Health, Safety and Licensing

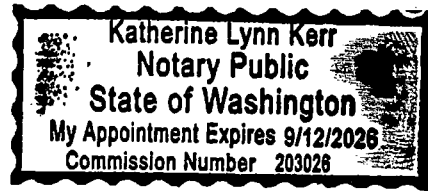
STATE OF WASHINGTON)
 :
) ss
COUNTY OF BENTON)

On this 23 day of August, 2022, before me, the undersigned, a Notary Public in and for the State of Washington, duly commissioned and sworn, personally appeared Timothy J. Tate to me known to be the Manager, Environmental, Health, Safety and Licensing of Framatome Inc., the corporation that executed the foregoing instrument, and acknowledged the said instrument to be the free and voluntary act and deed of said corporation, for the uses and purposes therein mentioned, and on oath stated that he is authorized to execute the said instrument.

Witness my hand and official seal hereto affixed the day and year first above written.



Katherine Lynn Kerr
Notary Public in and for the State of Washington,
residing at Benton, Washington.
My Commission Expires: 9/12/2026



Root Directory

Filename	Description
Document Summary for Transmittal (01,03,04)	This document

Folder = E08-01 Emergency Plan

Filename	Document Title
E08-01-1.0	Emergency Plan

Folder = E08-03 Implementing Procedures

Filename	Document Title
E08-03-1.1	Classifying an Emergency
E08-03-2.1	Protective Action Decisions
E08-03-3.1	Plant Emergency Director
E08-03-3.1A	Interim Plant Emergency Director
E08-03-3.2	Security Liaison
E08-03-3.3	Process Support Liaison
E08-03-3.4	Accountability Liaison
E08-03-3.5	PERT Liaison
E08-03-3.6	Recorder
E08-03-3.7	Staging Area Supervisor
E08-03-3.8	PERT Incident Commander
E08-03-3.9	Public Information Liaison
E08-03-3.10	Licensing Liaison
E08-03-3.11	Environmental Safety Liaisons
E08-03-3.12	Central Guard Station Officer
E08-03-3.13	County Emergency Operations Center Liaison
E08-03-3.14	Corporate CAT Liaison
E08-03-4.1	Participant Feedback Form
E08-03-4.2	Incident Notification Worksheet
E08-03-4.4	Incident Notification Worksheet – PERMT
E08-03-4.5	Plant Public Address Emergency Message Format
E08-03-5.1	After Action Report Form
E08-03-6.1A	Radiological Field Team Procedures – Air Samples
E08-03-6.1B	Radiological Field Team Procedures – Soil Samples
E08-03-6.1C	Radiological Field Team Procedures – Vegetation Samples
E08-03-6.2	Chemical Field Team Procedure
E08-03-6.3	Personnel Monitoring
E08-03-6.5	Chemical Spill Response Plan
E08-03-6.6	Response to Severe Earthquake
E08-03-6.7	Response to Tornado / High Winds
E08-03-6.8	Response to Volcano Eruption
E08-03-6.9	Response to Severe Floods
E08-03-7.1	Public Information Officer
E08-03-7.2	Assistant Public Information Officer

Filename	Document Title
E08-03-7.3	JIC Spokesperson
E08-03-7.4	Media Phone Team
E08-03-7.5	Public Information Phone Team
E08-03-7.6	Rumor Control Team
E08-03-7.7	News Team
E08-03-7.8	JIC Secretary and Clerk
E08-03-7.9	JIC Outside Agency Representatives
E08-03-8.2	Plant Evacuation Procedures – Offsite
E08-03-8.3	Plant Evacuation Procedures – Onsite
E08-03-8.4	Plant Evacuation Procedures – Individual Buildings
E08-03-8.5	Emergency Equipment Lists
E08-03-8.6	Admittance of Essential Personnel through Roadblocks
E08-03-8.7	Emergency Action Guides
E08-03-8.8	Imminent Threats Involving Aircraft
E08-03-8.9	Imminent Threats NOT Involving Aircraft
E08-03-8.10	Changes in the National Terrorism Advisory System Threat Level
E08-03-8.11	Response to Offsite Transportation Event
E08-03-8.12	Relocating the Emergency Operations Center
E08-03-8.13	Criticality Alarm for PED
E08-03-8.13A	Criticality Alarm for IPED on Backshifts, Weekends, Holidays
E08-03-8.13B	Criticality Alarm for IC

Folder = E08-04 Memoranda of Understanding

Filename	Document Title
E08-04-1.0	Letters of Agreement
E08-04-2.2	Kadlec Regional Medical Center
E08-04-2.4	US Department of Energy, Richland Operations Office
E08-04-2.5	City of Richland
E08-04-2.7	Richland Police Department
E08-04-2.9	Benton County Emergency Services
E08-04-2.10	Energy Northwest
E08-04-2.11	Franklin County Emergency Management
E08-04-2.12	Richland Fire Department
E08-04-3.1	Perma-Fix Northwest Richland, Incorporated