

**From:** Kevin Ramsey  
**To:** Judy Muszkiewicz  
**Date:** 3/5/03 9:42AM  
**Subject:** Summary of 2/27 meeting w/NFS

Please docket this as non-sensitive and available to the public.

On February 26-27, 2003, NRC staff met with staff from Nuclear Fuel Services (NFS) to discuss their amendment application for the Uranyl Nitrate Building (UNB) and their amendment application to add management measures to their license. The meeting agenda is attached. The following individuals participated:

NRC - Mary Adams, Dan Gillen, Eric Leeds, Kevin Ramsey, Fred Burrows, Bill Gleaves, Muffett Chatterton, Sheena Whaley

NFS - Neil Newman, Scott Kirk, Rik Droke, Randy Shackelford, Larry Sanders, Dan Denver, Jim Clark, Jennifer Wheeler

Change Pages for the Integrated Safety Analysis (ISA) Summary - NRC asked when revised pages of the ISA Summary will be submitted. The pages we have are dated August 2002. NFS stated that the revisions are specified in their responses to NRC requests for additional information. They don't plan to issue revisions to the ISA Summary until just before the readiness inspection in April.

NRC noted that changes in Table 4 imply that Table 1 will change also. NRC asked if NFS planned to change Table 1. NFS said no. Table 1 won't be changed because it is conservative already.

Assignment of Index Numbers to Initial Frequencies and Items Relied On For Safety (IROFS) - NRC noted that changes in Table 4 are closer to Table A-10, than Table A-9. NRC asked if that was appropriate. NFS said yes, they believe it is appropriate because the IROFS aren't continuously challenged. NRC believes that some IROFS may be continuously challenged. It was agreed that NRC and NFS staff would caucus among themselves for a few minutes.

After the caucus, NRC discussed the coordination between Table 1 and Table 4. NRC believes the revised Table 4 is inconsistent with Table 1. NRC would prefer to use the original Table 4, otherwise Table 1 would need revision and NRC would have to re-review. NFS asked that this issue be tabled until they could consider their response.

Management Measures - NFS stated that it is moving the proposed language to Part I of the license without any changes. NRC has concerns that all of the acceptance criteria in Chapter 11 of the Standard Review Plan (SRP) haven't been addressed. For example, the application fails to describe how NFS will establish and maintain the design requirements and associated design bases. NFS agreed that the application didn't address that item. NFS noted that many of the acceptance criteria may be addressed elsewhere in the license. NRC suggested that NFS develop a "cross-walk" table to explain where the various criteria are addressed. NFS believed that the management measures language in the ISA Summary was acceptable to NRC. NRC noted that the SRP acceptance criteria for management measures in the license are distinct from the acceptance criteria for the ISA Summary. NFS expects to submit the revised management measures amendment request early next week.

Specifics of Quality Assurance (QA) of Savannah River Site (SRS) - NRC is reviewing the QA information e-mailed on 2/25/03. The review isn't complete, but the information appears to address many of our concerns. We may have questions about the audit provisions (i.e., qualified staff, etc.). NFS asked what acceptance criteria NRC uses for QA. NRC stated that this is a unique situation because SRS isn't an NRC licensee. NRC needs reasonable assurance that the SRS program will satisfy the first leg of double contingency. NRC expects to have review findings by the middle of next week.

Justifications for Highly Unlikely, Unlikely, Double Contingency for each Scenario, and Administrative

Controls - NRC is reviewing information submitted by NFS yesterday (2/25/03). NRC expects to have review findings by the middle of next week. NFS offered to walk through the justifications tomorrow morning. NFS requested a short caucus among its staff.

After the caucus, NFS requested that the meeting continue in the morning so they could discuss these matters further. It was agreed that we would recess until 8 am on 2/27/03.

Continuation of Meeting on 2/27/03 - NFS stated that they wanted to discuss the concerns about the index numbers in the ISA Summary and the difference between Tables 1 and 4. NRC asked if all the index numbers for active engineered controls are based on "failure on demand." NFS said yes. NRC stated that it would need failure frequencies for controls which have continuous duty. NFS did not want to provide this because their analysis is qualitative, not quantitative. NFS noted that their analysis is consistent with failure data in the SRS database that NRC asked licensees to use last year when it proposed a "rosetta stone" (matrix assigning quantitative numbers to qualitative controls). NRC agreed that the SRS database would provide an acceptable basis for the changes to Table 4. NRC requested that NFS add footnotes specifying the basis for the values in Table 4 and explaining why they differ from Table 1. The footnotes should include a statement explaining why the SRS data is relevant to the NFS operations. NFS agreed to add footnotes to Table 4.

NFS conducted a detailed discussion of the justification information submitted on 2/25/03

Conclusion:

NFS will add footnotes or other information explaining why Table 4 differs from Table 1 in the ISA Summary. This will be completed by 3/3/03.

Scott Kirk and Mary Adams will discuss the necessary changes to the management measures amendment request tomorrow (2/28)

NRC will provide feedback on the QA information for SRS by the middle of next week.

NFS requested that a conference call be scheduled for morning of 3/5/03 to discuss the status of these actions.

NRC said they still needed a copy of the nuclear criticality safety evaluation to be submitted and docketed so they could use it as the basis of the Safety Evaluation Report (SER). NFS asked why NRC couldn't use a copy of the NCSE e-mailed to NRC previously. NRC said the document hadn't been docketed because it was marked proprietary, but NFS had failed to provide the affidavit required to withhold it from the public. NRC has been asking the affidavit required to docket the information for several months. If NRC docketed the NCSE provided with the e-mail, it would be available to the public.

NFS agreed to prepare and submit the affidavit as soon as possible. NRC noted that a non-proprietary version of the document should be submitted also. NFS noted that the entire document may be proprietary.

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**CC:** Bill Gleaves; Daniel Gillen; Eric Leeds; Frederick Burrows; KirkS; Lidia Roche; Margaret Chatterton; Mary Adams; NewmanN; Sheena Whaley

## REMAINING UNB ISSUES FOR NFS/NRC February 26, 2003 MEETING

- Change pages for ISA Summary
- Assignment of Index Numbers to Initial Frequencies and IROFS
- Management Measures
- Specifics of QA of Savannah River Site
- Justifications for highly unlikely, unlikely and double contingency for each scenario (RAI# 2)
- Justification for administrative controls (RAI # 16)