

July 20, 2004

MEMORANDUM TO: Joseph G. Giitter, Chief
Special Projects Branch
Division of Fuel Cycle Safety
and Safeguards

THRU: Brian W. Smith, Chief **/RA/**
Gas Centrifuge Facility Licensing Section
Special Projects Branch, FCSS

FROM: Timothy C. Johnson **/RA/**
Senior Mechanical Systems Engineer
Gas Centrifuge Facility Licensing Section
Special Projects Branch, FCSS

SUBJECT: JULY 1, 2004, TELEPHONE SUMMARY: LOUISIANA ENERGY
SERVICES REQUESTS FOR ADDITIONAL INFORMATION

On July 1, 2004, U.S. Nuclear Regulatory Commission (NRC) staff held a telephone conference call with staff from Louisiana Energy Services (LES) to discuss the LES responses to requests for additional information in the areas of criticality safety and the Integrated Safety Analysis summary. I am attaching the telephone summary for your use. The summary contains no proprietary or classified information.

Docket: 70-3103

Attachment: Louisiana Energy Services
Telephone Summary

cc:	William Szymanski/DOE	Claydean Claiborne/Jal	Rod Krich/LES
	Monty Newman/Hobbs	James Curtiss/W&S	Troy Harris/Lovington
	Peter Miner/USEC	Betty Richman/Tatum	James Ferland/LES
	Glen Hackler/Andrews	Dennis Holmberg/Lea Cty	William Floyd/NMED
	James Brown/Eunice	Richard Ratliff/Texas	M. Marriotte/NIRS
	Jerry Clift/Hartsville	CO'Claire/Ohio	Lee Cheney/CNIC
	Derrith Watchman-Moore/NMED	Joseph Malherek/PC	Ron Curry/NMED
	Clay Clark/NMED	Patricia Madrid/NMAG	Glen Smith/NMAG
	Lindsay Lovejoy/NIRS		

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OFC	SPB		SPB		SPB	
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DATE	07/19 /04		07/20/04		07/ 20 /04	

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Telephone Conference Call Summary

Criticality Safety

Date and Time: 10:00 AM; July 1, 2004

Call Participants:	H. Felsher/NRC	B. Smith/NRC
	J. Giitter/NRC	M. Galloway/NRC
	W. Troskoski/NRC	T.C. Johnson/NRC
	R. Krich/LES	D. Pepe/Areva
	D. Green/LES	B. Hubbard/LES
	D. Williamson/LES	R. Kacatoouti/LES
	R. Turcotte/LES	

During the conference call, staff discussed the Louisiana Energy Services (LES) Request for Additional Information (RAI) responses related to criticality safety and the Integrated Safety Analysis (ISA) summary.

For RAI OA-1, NRC staff indicated that the organization charts appeared to have the same position located more than once and it is unclear how those functions are organized. LES staff indicated it would reconsider the charts.

For RAI ISA-1, NRC staff requested that the ISA summary be separated from the application. LES staff indicated that it believed it was following the guidance in NUREG-1520, "Standard Review Plan for the Review of a License Application for a Fuel Cycle Facility." LES staff also stated that there would be a logistical problem in rewriting Chapter 3 of the application and further discussion is needed.

For RAI ISA-2, NRC staff indicated that the response appears to be acceptable, but an outline/description of the nuclear criticality safety documents LES is using needs to be provided in Chapter 5 of the Safety Analysis Report (SAR) to ensure a clear understanding of how the documents are used. LES agreed to provide this in the next revision of the SAR.

For RAI ISA-6, NRC staff indicated that information on the Criticality Accident Alarm System in the ISA summary needs to be supplemented by information in Chapter 5 of the SAR to be consistent with the regulatory requirements for the ISA summary and the SAR. LES staff agreed to provide this information in the next revision of the SAR.

For RAI ISA-8, NRC staff indicated that for new facilities double contingency is not optional and must be provided. Terms stating that double contingency will be applied "if practical" are not appropriate even though the NUREG-1520 guidance may suggest that this wording is acceptable. LES indicated that double contingency is applied and it will modify the SAR to provide this commitment.

For RAI ISA-38, NRC staff stated that the response appears to be acceptable, but the information needs to be placed in the ISA summary. LES also needs to clarify that bookkeeping measures are items relied on for safety (IROFS). LES staff agreed to make this change in the next revision of the SAR.

For RAI ISA-45, NRC staff indicated that LES should either declare geometrically safe components IROFS or designate the configuration management program an IROFS to ensure that human errors in the implementation of the configuration changes would be considered. LES staff indicated they considered that it would be problematic to try to include a management measure as an IROFS. LES staff also had a concern in designating certain favorable geometry components as IROFS and suggested that further discussion on this topic is needed.

For RAI ISA-50, NRC staff indicated that some of the initiating event table entries are unclear in identifying the initiating events of an event scenario. Some initiating events appear to be the consequences of the scenario (e.g., criticality) and not actual initiating events. NRC staff indicated that some index values appear to be based on the consequences of the accident sequence rather than the initiating event. LES staff agreed to review the tables and clarify the initiating events, as needed.

For RAI ISA-58, NRC staff stated that LES needed to provide the definitions of types of controls (e.g., enhanced administrative controls, active engineered controls, etc.) or use the definitions as stated in NUREG-1520. LES staff agreed to add this information in the next revision to the SAR.

For RAI NCS-1, NRC staff indicated that LES' response appears to be acceptable, but the information needs to be in the process descriptions in the ISA summary. LES staff agreed to provide that in the next revision to the ISA summary.

For RAI NCS-2, NRC staff indicated that the LES response appears to be acceptable, but the information needs to be in Chapter 5.0 of the SAR along with a clear commitment to use the American Nuclear Society Series 8 nuclear criticality safety standards. LES staff agreed to provide that in the next revision to the SAR.

For RAI NCS-3, NRC staff indicated that the LES response appears to be acceptable, but the information regarding enrichment control at 1.5 wt. percent for the contingency dump system needs to be in Chapter 5.0 of the SAR. LES staff agreed to provide that in the next revision to the license application.

For RAI NCS-4, NRC staff indicated that the LES response appears to be acceptable, but the k-effective limits need to be consistent (i.e., k-effective plus three sigma) and the information needs to be in Chapter 5.0 of the SAR. LES agreed to provide that in the next revision to the SAR.

For RAI NCS-5, NRC staff indicated that the LES response appears to be acceptable, but there needs to be a clear commitment to quality assurance of the MONK8A code and the information needs to be in Chapter 5.0 of the SAR. LES staff agreed to provide that in the next revision to the SAR.

For RAI NCS-6, NRC staff indicated that the LES response appears to be acceptable, but that if LES uses "enhanced administrative controls," then its definition and a description of its use need to be in Chapter 5.0 of the SAR. LES staff agreed to provide that in the next revision to the SAR.