

3.0 INTEGRATED SAFETY ANALYSIS AND INTEGRATED SAFETY ANALYSIS SUMMARY

The requirements in 10 *Code of Federal Regulations* (CFR) 70.62(c) specify that an Integrated Safety Analysis (ISA) of the appropriate level of detail for the complexity of the process involved be conducted and maintained. An ISA Summary is required by 10 CFR 70.65(b). Accordingly, USEC Inc. (USEC) has conducted an ISA of adequate complexity to support preparation of an ISA Summary for the ACP. The ISA is a compilation of the design and analysis documentation utilized to: 1) identify the potential accident sequences that could occur, 2) designate items relied on for safety (IROFS) to either prevent such accidents or mitigate their consequences to an acceptable level, and 3) identify the management measures to provide reasonable assurance of the availability and reliability of IROFS.

The ISA Summary is a synopsis of the ISA and contains the information required by 10 CFR 70.65(b). The ISA Summary is updated continuously to reflect changes to the ISA. Neither the ISA nor the ISA Summary is incorporated as part of this license. The ISA documentation is available to the U.S. Nuclear Regulatory Commission (NRC) by request at the ACP through the Regulatory Manager. The ISA Summary is maintained as a separate document from the license application, and is submitted separate from this license application. In addition to providing a synopsis of the results of the ISA, the ISA Summary describes the methods and criteria utilized in the safety analysis and describes the qualifications of the team performing the ISA.

3.1 Safety Program and Integrated Safety Analysis Commitments

3.1.1 Process Safety Information

The Chemical Process Safety program is described in Chapter 6.0 of this license application. Consistent with this program, USEC compiles and maintains an up-to-date database of process-safety information. Written process-safety information is used in updating the ISA and in identifying and understanding the hazards associated with the processes. The compilation of written process-safety information includes information pertaining to:

- The hazards of materials used or produced in the process, which includes information on chemical and physical properties (e.g., toxicity, acute exposure limits, reactivity, and chemical and thermal stability) such as those included on Material Safety Data Sheets (meeting the requirements of 29 CFR 1910.1200(g));
- Technology of the process, which includes a block flow diagram or simplified process flow diagram, a brief outline of the process chemistry, safe upper and lower limits for controlled parameters (e.g., temperature, pressure, flow, and concentration), and evaluation of the health and safety consequences of process deviations;
- Equipment used in the process, which includes general information on topics such as the materials of construction, piping and instrumentation diagrams, ventilation;

design codes and standards employed, material and energy balances, IROFS (e.g., interlocks, detection, or suppression systems), electrical classification, and relief system design and design basis; and

- The applicability of 29 CFR 1910.119 (Process Safety Management) and 40 CFR Part 68 (Risk Management Plan) to operation of the ACP to assure that chemicals not related to the licensed material are evaluated as necessary.

The ISA considers chemical process safety through out the analysis development. Process safety is considered when identifying the credible accident scenarios, developing the IROFS, and establishing the management measures to ensure the health and safety of the workforce and public. The ISA and ISA Summary are maintained and updated by written procedures using qualified personnel to ensure that process safety information is accurately reflected in accordance with 10 CFR 70.72.

3.1.2 Integrated Safety Analysis

An ISA of the design and operation of the ACP was conducted in accordance with the guidance provided in NUREG-1513, *Integrated Safety Analysis Guidance Document* and the requirements of 10 CFR 70.62(c). The ISA is a collection of the design documentation and programmatic information reviewed and utilized during the course of the ISA effort. This information is available on site for NRC review.

The ISA documentation is sufficiently detailed to identify the following:

- Radiological hazards;
- Chemical hazards that could increase radiological risk;
- Facility hazards that could increase radiological risk;
- Chemical hazards from materials involved in processing licensed materials;
- Potential accident sequences;
- Consequences and likelihood of each accident sequence; and
- IROFS including the assumptions and conditions under which they support compliance with the performance requirements of 10 CFR 70.61.

Should the addition of new processes or other changes to the ACP be necessary, evaluations of appropriate complexity for each process will be performed in accordance with 10 CFR 70.72, using established ISA methods to ensure the processes can be carried out in a manner such that compliance with the performance requirements of 10 CFR 70.61 are maintained.

USEC maintains the ISA and ISA Summary so that it is accurate and up-to-date by means of a suitable configuration management system, described in Section 11.1 of this license application. ACP procedures specify the criteria for changing the ISA Summary. Changes to the ACP are evaluated against the ISA and ISA Summary using a change process that meets the requirements of 10 CFR 70.72. Changes to the ISA Summary are submitted to the NRC in accordance with 10 CFR 70.72(d)(1) and (3). The ISA accounts for any changes made to the ACP or its processes (e.g., changes to the site, operating procedures, or control systems). Any facility change, operational change, or change in the process safety information that may alter the parameters of an accident sequence is evaluated by means of the ISA methods. USEC evaluates proposed changes to the ACP or its operations by means of the ISA methods and designates new or additional IROFS, along with appropriate management measures, as necessary.

USEC also evaluates the adequacy of existing IROFS and associated management measures and makes any required changes prior to making changes to the ACP and/or its processes. If a proposed change results in a new type of accident sequence (e.g., different initiating event or significant changes in the consequences) or increases the consequences and/or likelihood of a previously analyzed accident sequence within the context of 10 CFR 70.61, USEC evaluates whether changes to existing or additional IROFS, or associated management measures are required. For any changes that require prior NRC approval under 10 CFR 70.72, USEC will submit an amendment request in accordance with 10 CFR 70.34 and 70.65.

The Engineering Manager is responsible for maintaining the ISA and ISA Summary (i.e., reviewing proposed changes, performing analyses, and ensuring implementation of required updates). The Regulatory Manager is responsible for submitting the required changes to the NRC and coordinating information requests from the NRC.

Suitably qualified personnel update and maintain the ISA and ISA Summary. The ISA team consists of at least one team leader who is formally trained and knowledgeable in the ACP's ISA methods and individuals with specific, detailed experience in the operation, hazards, and safety design criteria of the particular process being evaluated. Personnel with appropriate experience and expertise in engineering and process operations are utilized in the maintenance and updating of the ISA and ISA Summary. Written procedures are used to implement the ISA process and are maintained onsite. For any revisions to the ISA Summary, personnel having qualifications similar to those of ISA team members who conducted the original ISA are used.

3.1.3 Management Measures

ACP IROFS are identified in the ISA Summary. Management measures are utilized to maintain the IROFS so that they are available and reliable to perform their safety functions when needed. Management measures are the principal mechanism by which the reliability and availability of each IROFS is ensured. Management Measures are described in Chapter 11.0 of this license application. Any IROFS deficiencies are addressed in accordance with the Corrective Action Program.

3.2 Integrated Safety Analysis Summary

An ISA Summary for the ACP meeting the requirements of 10 CFR 70.65(b) was prepared in accordance with the guidance contained in Chapter 3.0 of NUREG-1520, *Standard Review Plan for the Review of a License Application for a Fuel Cycle Facility* and NUREG-1513, *Integrated Safety Analysis Guidance Document*. The ISA Summary is being submitted for review (separate from this license application).

3.3 References

1. LA-3605-0003, Integrated Safety Analysis Summary for the American Centrifuge Plant
2. NUREG-1513, *Integrated Safety Analysis Guidance Document*
3. NUREG-1520, *Standard Review Plan for the Review of a License Application for a Fuel Cycle Facility*
4. NUREG/CR-6410, *Nuclear Fuel Cycle Facility Accident Analysis Handbook*