

2.0 ORGANIZATION AND ADMINISTRATION

USEC Inc. (USEC) is committed to conducting operations at the American Centrifuge Plant (ACP) in a manner that protects the health and safety of workers and the public; protects the environment; and provides for the common defense and security. In order to meet these objectives, as well as others required for operation of the ACP, USEC maintains the following operations policy with respect to environmental, health, nuclear safety, safeguards, security, and quality to guide the day-to-day business activities of, and provide direction to, ACP personnel.

USEC is responsible for safe operation of the ACP and is committed to conducting operations in a manner that protects the health and safety of workers and the public; protects the environment; provides for the common defense and security; and is in compliance with applicable local, state, and federal laws and regulations.

USEC has provided the management structure to ensure that this policy is effectively implemented. The Operations organization is responsible for the safe operation of the ACP. Programs and staff organizations are established for the environmental, health, safety, safeguards, security, and quality areas and are provided with sufficient resources to support safe operation of the ACP.

USEC is responsible for the design, quality assurance (QA), refurbishment/construction, testing, start-up, operation, maintenance, and decommissioning of the ACP. Preparation of some refurbishment/construction documents and portions of the refurbishment/construction activities are contracted to qualified contractors. The Engineering Manager has the responsibility for construction management and coordination with the contractor(s). USEC staffs the ACP with qualified individuals to ensure a smooth transition from refurbishment/construction activities to plant operations.

Managerial positions that have the principal responsibilities important to environmental, health, safety, safeguards, security, and quality for the ACP are described in this chapter. Their qualifications, responsibilities, and authorities are clearly defined in position descriptions that are accessible to affected personnel and the U.S. Nuclear Regulatory Commission (NRC) upon request.

Section 2.1 describes the organizational commitments, relationships, responsibilities, and authorities for the overall management system to assure the protection of the health and safety of the workers and the public; protection of the environment; and provide for the common defense and security. This section includes the qualifications, functions, responsibilities, and authorities of the positions in the organizations assigned functions related to environmental, health, safety, safeguards, security, and quality during the stages of the project, from design through refurbishment/construction, start-up, operation, and decommissioning.

Section 2.2 describes the management controls for maintaining the environmental, health, safety, safeguards, and quality programs and the administrative systems to control relationships and interfaces between the programs.

Section 2.3 describes USEC's plans and the management controls for pre-operational testing and initial start-up of the ACP.

2.1 Organizational Commitments, Relationships, Responsibilities, and Authorities

The ACP management structure provides for line responsibility for safe operations with sufficient staff support to develop, communicate, and implement technical programs for various environmental, health, safety, safeguards, security, and quality areas. Figure 2.1-1 depicts the ACP organization.

The Director, American Centrifuge Plant provides overall direction and management of ACP operations, and oversees activities to ensure safe and reliable operations and refurbishment/construction. The Plant Support Manager, Engineering Manager, and Manager, Enrichment Operations report to the Director, American Centrifuge Plant and manage the activities in their areas of responsibility.

Minimum qualifications, functions, and responsibilities for key staff positions are described below. The personnel responsible for managing the design, refurbishment/construction, and operation of the plant have the substantive breadth and level of experience to successfully execute their responsibilities. These key staff positions are located at the plant and are available as necessary. Alternates are designated in writing and in accordance with procedural requirements to fulfill the responsibilities and authorities of these personnel during their absence from the plant. Alternates will meet the minimum qualification for the corresponding position.

Throughout this section, equivalent technical experience means the substitution of two years of nuclear industry experience for each year of college up to a total of three years. Additionally, 30-semester hours or 45-quarter hours from an accredited college or university may be substituted for the remaining one year of baccalaureate education. Individuals who do not meet the formal educational requirements specified in this section or do not meet the equivalent technical experience defined above are not automatically eliminated where other factors provide sufficient demonstration of their abilities to fulfill the duties of a specific position. These other factors must clearly demonstrate proficiency in the technical area for which the position will be responsible (e.g., a license or certification, documented completion of relevant training, or previous experience in the same position at another plant). These factors are evaluated on a case-by-case basis, documented, and approved by the Director, American Centrifuge Plant.

2.1.1 Senior Vice President

The Senior Vice President, located at headquarters, reports to the Executive Vice President and Chief Operating Officer. The Senior Vice President has overall responsibility for safe operation of the ACP and has shutdown and stop work authority for the ACP. If such authority is exercised, the Senior Vice President must concur with restart of shutdown operations.

The Senior Vice President has, as a minimum, a bachelor's degree in engineering or the physical sciences or equivalent technical experience, six years nuclear experience, and ten years of management experience, which may be concurrent with the nuclear experience.

The USEC Board of Directors appoints the Senior Vice President.

2.1.2 Director, Regulatory and Quality Assurance

The Director, Regulatory and Quality Assurance, located at headquarters, reports to the Senior Vice President.

This position has responsibility for the management of regulatory and quality assurance functions and the ACP policy system. This individual is the primary day-to-day interface with the NRC and has overall responsibility for management of activities related to license requirements for the ACP. Although this individual works closely with the Director, American Centrifuge Plant and key plant personnel, he/she is independent from production, plant operating cost, and production schedule concerns, and has the authority to stop work if there is a failure to adhere to regulatory requirements. If such authority is exercised, the Director, Regulatory and Quality Assurance must concur with restart of shutdown operations.

This position has, as a minimum, a bachelor's degree in engineering or physical sciences or equivalent technical experience, and six years of nuclear experience, and six years of management experience, which may be concurrent with the nuclear experience.

The Senior Vice President appoints the Director, Regulatory and Quality Assurance.

2.1.2.1 Regulatory Manager

The Regulatory Manager, located at the ACP, reports to the Director, Regulatory and Quality Assurance.

The Regulatory Manager is responsible for regulatory oversight functions, environmental compliance, and commitment management. The Regulatory Manager, as delegated by the Director, Regulatory and Quality Assurance, and Director, American Centrifuge Plant, maintains the day-to-day interface with NRC representatives on matters of regulatory compliance. The individual has responsibility for managing the plant change process and ensuring the plant change reporting requirements are met. The Regulatory Manager is also responsible for implementing the

Corrective Action Program; ensuring incident investigations are performed; and providing management with data to assure that corrective actions and commitments are properly addressed and managed to facilitate compliance with implementing policies and procedures.

The Regulatory Manager has shutdown and stop work authority in any part of the ACP where activities are not being conducted in accordance with applicable regulatory requirements. If such authority is exercised, the Regulatory Manager must concur with restart of shutdown operations.

The Regulatory Manager has, as a minimum, a bachelor's degree in engineering or the physical sciences or equivalent technical experience, and four years of nuclear experience.

The Director, Regulatory and Quality Assurance appoints the Regulatory Manager, with concurrence from the Director, American Centrifuge Plant.

2.1.2.2 Quality Assurance Manager

The QA Manager, located at the ACP, reports to the Director, Regulatory and Quality Assurance.

The QA Manager has the responsibility to exercise oversight of procurement, refurbishment, construction, start-up, and plant operations to ensure that the health and safety of the public and workers are adequately protected; to ensure compliance with safety, safeguards, and quality requirements; and to ensure implementation of the Quality Assurance Program Description (QAPD) for the ACP, policies, procedures, and management expectations.

The QA Manager has direct access to the Senior Vice President for quality assurance matters and has shutdown and stop work authority, when necessary, to ensure protection of public and worker health and safety; provide for common defense and security; and to ensure regulatory and quality compliance. If such authority is exercised, the QA Manager must concur with restart of shutdown operations. The QA Manager has access to information at the plant related to safety, safeguards, and quality. This manager interacts directly with the Director, American Centrifuge Plant, other managers, and key ACP personnel, and participates (as desired) in any evaluations or discussions related to safety, safeguards, and quality. The QA Manager informs the Director, American Centrifuge Plant and the Director, Regulatory and Quality Assurance about safety, safeguards, and quality issues and compliance.

The QA Manager provides independent oversight and assessment to ensure that the health and safety of the public and workers are adequately protected; to ensure compliance with safety, safeguards, and quality requirements; and to ensure implementation of policies, procedures and management expectations.

The QA Manager has, as a minimum, a bachelor's degree in engineering or the physical sciences or equivalent technical experience, and four years nuclear experience, and four years of

management experience in quality assurance; nuclear safety oversight; engineering and technical support; or regulatory affairs, which may be concurrent with the nuclear experience.

The Director, Regulatory and Quality Assurance appoints the QA Manager, with concurrence from the Senior Vice President.

2.1.3 Director, American Centrifuge Plant

The Director, American Centrifuge Plant, located at the ACP, reports to the Senior Vice President.

The Director, American Centrifuge Plant is responsible for the day-to-day safe operation of the plant, compliance with applicable NRC regulatory requirements, and adherence to applicable policies. The Director, American Centrifuge Plant is responsible for the overall safe operation and maintenance of the ACP, including refurbishment/construction, initial start-up, testing, and operation. The Director, American Centrifuge Plant is responsible for training, procedures, engineering, and occupational, environmental, and nuclear safety. The Director, American Centrifuge Plant also has primary responsibility for the interface with NRC inspection personnel on matters of regulatory compliance, and may delegate responsibility for this day-to-day interface to the Regulatory Manager.

The Director, American Centrifuge Plant has shutdown and stop work authority for the ACP, and if such authority is exercised, must concur with restart of shutdown operations. The Director, American Centrifuge Plant must obtain concurrence of the Senior Vice President for restart of any operations that were directed to be shutdown by the Quality Assurance Manager or the Director, Regulatory and Quality Assurance.

The Director, American Centrifuge Plant has, as a minimum, a bachelor's degree in engineering or the physical sciences or equivalent technical experience, six years of nuclear experience, and six years of management experience, which may be concurrent with the nuclear experience.

The Senior Vice President appoints the Director, American Centrifuge Plant.

2.1.3.1 Plant Support Manager

The Plant Support Manager reports to the Director, American Centrifuge Plant.

The Plant Support Manager is responsible for Fire Safety, Health Services, Emergency Management, and Nuclear Materials Control and Accountability for the ACP.

In the absence of the Director, American Centrifuge Plant, the Plant Support Manager may be delegated the responsibilities and authorities of the Director, American Centrifuge Plant. The Plant Support Manager has shutdown and stop work authority in any part of the ACP where activities are not being conducted in accordance with applicable regulatory requirements for

which the Plant Support Manager has responsibility. If such authority is exercised, the Plant Support Manager must concur with restart of shutdown operations.

The Plant Support Manager has, as a minimum, a bachelor's degree in engineering or the physical sciences or equivalent technical experience, and four years of nuclear experience.

The Director, American Centrifuge Plant appoints the Plant Support Manager, with concurrence from the Senior Vice President.

2.1.3.1.1 Fire Safety Manager

The Fire Safety Manager reports to the Plant Support Manager.

The Fire Safety Manager is responsible for fire protection services, including interpretation and application of applicable fire codes and standards and emergency management; and has shutdown and stop work authority for activities at the ACP not being conducted in accordance with applicable fire protection requirements. If such authority is exercised, the Fire Safety Manager must concur with restart of shutdown operations.

The Fire Safety Manager has, as a minimum, a bachelor's degree or equivalent technical experience, four years of fire protection experience, and six months of nuclear experience.

The Plant Support Manager appoints the Fire Safety Manager, with the concurrence of the Director, American Centrifuge Plant.

2.1.3.1.2 Nuclear Materials Control and Accountability Manager

The Nuclear Materials Control and Accountability (NMC&A) Manager reports to the Plant Support Manager.

The NMC&A Manager is responsible for ensuring that an effective NMC&A program is implemented and has shutdown and stop work authority for activities at the ACP not being conducted in accordance with NMC&A requirements. If such authority is exercised, the NMC&A Manager must concur with restart of shutdown operations.

The NMC&A Manager has, as a minimum, a bachelor's degree or equivalent technical experience, and four years NMC&A experience.

The Plant Support Manager appoints the NMC&A Manager, with the concurrence of the Director, American Centrifuge Plant.

2.1.3.2 Engineering Manager

The Engineering Manager reports to the Director, American Centrifuge Plant.

The Engineering Manager is responsible for engineering activities in support of operations including projects (i.e., design, fabrication, and construction of plant modifications or additions), system engineering, procurement, construction management, and construction engineering; as well as providing the primary interface with the refurbishment/construction contractor(s), and records management and document control. The Engineering Manager manages the design change process for the ACP.

The Engineering Manager is responsible for the Nuclear Criticality Safety (NCS) Program and for maintaining the Integrated Safety Analysis (ISA) for the ACP.

In the absence of the Director, American Centrifuge Plant, the Engineering Manager may be delegated the responsibilities and authorities of the Director, American Centrifuge Plant. The Engineering Manager has shutdown and stop work authority for any activity that poses a nuclear safety or criticality concern; or any activity that would be or is in violation of the ACP's licensing or design basis, or the assumptions or evaluations contained in the ISA Summary. If such authority is exercised, the Engineering Manager must concur with restart of shutdown operations.

The Engineering Manager has, as a minimum, a bachelor's degree in engineering or the physical sciences or equivalent technical experience, and four years of nuclear experience.

The Director, American Centrifuge Plant appoints the Engineering Manager with concurrence from the Senior Vice President.

2.1.3.2.1 Nuclear Safety Manager

The Nuclear Safety Manager reports to the Engineering Manager.

The Nuclear Safety Manager is responsible for developing and implementing the safety analysis program for the ACP. These duties include technical oversight of safety analysis, safety analysis training, review of procedures involving fissile material operations, and assessments of program implementation. The Nuclear Safety Manager is also responsible for procurement engineering and configuration management. The Nuclear Safety Manager has direct access to the Director, American Centrifuge Plant concerning nuclear safety matters and has shutdown and stop work authority for any activity that would be or is in violation of the ACP's licensing or design basis, or the assumptions or evaluations contained in the ISA Summary. If such authority is exercised, the Nuclear Safety Manager must concur with restart of shutdown operations.

The Nuclear Safety Manager is also responsible for the management of NCS functions, including administering the NCS program. These duties include programmatic oversight of NCS and NCS training.

The Nuclear Safety Manager has, as a minimum, a bachelor's degree in engineering or the physical sciences or equivalent technical experience, and four years nuclear experience, including six months at a uranium processing plant.

The Engineering Manager appoints the Nuclear Safety Manager, with the concurrence of the Director, American Centrifuge Plant.

2.1.3.2.1.1 Nuclear Criticality Safety Manager

The NCS Manager reports to the Nuclear Safety Manager.

The position is responsible for the management of NCS functions, including administering the NCS program and conducting assessments of program implementation. These duties include programmatic oversight of NCS and NCS training. The NCS Manager has stop work authority for any activity that could cause a NCS concern. If such authority is exercised, the NCS Manager must concur with restart of shutdown operations.

The NCS Manager has, as a minimum, a bachelor's degree in engineering or the physical sciences or equivalent technical experience, and four years nuclear experience, including six months at a uranium processing facility where NCS was practiced.

The Nuclear Safety Manager appoints the Nuclear Criticality Safety Manager, with the concurrence of the Engineering Manager.

2.1.3.3 Manager, Enrichment Operations

The Manager, Enrichment Operations reports to the Director, American Centrifuge Plant.

The Manager, Enrichment Operations is responsible for the day-to-day production activities at the ACP including production support, operations, and maintenance.

In the absence of the Director, American Centrifuge Plant, the Manager, Enrichment Operations may be delegated the responsibilities and authorities of the Director, American Centrifuge Plant. The Manager, Enrichment Operations has shutdown and stop work authority in any part of the ACP where activities are not being conducted in accordance with applicable regulatory requirements. If such authority is exercised, the Manager, Enrichment Operations must concur with restart of shutdown operations.

The Manager, Enrichment Operations has, as a minimum, a bachelor's degree in engineering or the physical sciences or equivalent technical experience, and four years of nuclear experience.

The Manager, Enrichment Operations is appointed by the Director, American Centrifuge Plant, with concurrence from the Senior Vice President.

2.1.3.3.1 Production Support Manager

The Production Support Manager reports to the Manager, Enrichment Operations.

The Production Support Manager is responsible for industrial safety, industrial hygiene, chemical safety, and the Radiation Protection Program; waste management; environmental survey; and training and procedures. In the absence of the Manager, Enrichment Operations, the Production Support Manager may be delegated the responsibilities and authorities of the Manager, Enrichment Operations. The Production Support Manager has shutdown and stop work authority in any part of the operation for which he/she has responsibility. If such authority is exercised, the Production Support Manager must concur with restart of shutdown operations.

The Production Support Manager has, as a minimum, a bachelor's degree in engineering or the physical sciences or equivalent technical experience, and four years of nuclear experience.

The Manager, Enrichment Operations appoints the Production Support Manager, with concurrence from the Director, American Centrifuge Plant.

2.1.3.3.1.1 Radiation Protection Manager

The Radiation Protection Manager (RPM) reports to the Production Support Manager.

The RPM is responsible for the Radiation Protection (RP) Program for the plant. The RPM is responsible for providing guidance and direction for establishment and implementation of the RP Program and has the authority to deny access to radiological areas by personnel who do not adhere to radiological protection requirements. The RPM has oversight of radiological protection procedures with the authority to oversee and to maintain the integrity of the RP Program. The RPM has direct access to the Director, American Centrifuge Plant and the Senior Vice President for radiation protection matters, and has shutdown and stop work authority for activities not being conducted in accordance with radiation protection requirements and policies. If such authority is exercised, the RPM must concur with restart of shutdown operations.

The RPM has, as a minimum, a bachelor's degree in engineering, health physics, radiation protection, or the physical sciences or equivalent technical experience, and four years experience in radiation protection, including six months at a uranium processing plant.

The Production Support Manager appoints the RPM, with the concurrence of the Manager, Enrichment Operations.

2.1.3.3.1.2 Training Manager

The Training Manager reports to the Production Support Manager.

The Training Manager is responsible for preparation, presentation, and documentation of employee orientations; and for technical and qualification training program development and

implementation. The Training Manager is also responsible for the development and implementation of the procedures program. The Training Manager has shutdown and stop work authority in any part of the operation for which he/she has responsibility. If such authority is exercised, the Training Manager must concur with restart of shutdown operations.

The Training Manager has, as a minimum, a bachelor's degree in engineering or the physical sciences or equivalent technical experience, and four years of nuclear experience.

The Production Support Manager appoints the Training Manager, with concurrence of the Manager, Enrichment Operations.

2.1.3.3.2 Operations Manager

The Operations Manager reports to the Manager, Enrichment Operations.

The Operations Manager is responsible for enrichment operations; feed and withdrawal operations; utilities; production management; shift operations; packaging and transportation; and repair and assembly of centrifuge machines. This includes activities such as ensuring the correct and safe operation of the uranium hexafluoride (UF₆) processes; proper receipt, storage, handling, and on-site transportation of UF₆; and providing chemical cleaning and decontamination services. Operational analysis of cascade performance is also the responsibility of the Operations Manager.

In the absence of the Manager, Enrichment Operations, the Operations Manager may be delegated the responsibilities and authorities of the Manager, Enrichment Operations. The Operations Manager has shutdown and stop work authority in any part of the operation for which he/she has responsibility. If such authority is exercised, the Operations Manager must concur with restart of shutdown operations.

The Operations Manager has, as a minimum, a bachelor's degree in engineering or the physical sciences or equivalent technical experience, and four years of nuclear experience, including six months at a uranium processing plant.

The Operations Manager is appointed by the Manager, Enrichment Operations, with concurrence from the Director, American Centrifuge Plant.

2.1.3.3.2.1 Operations Supervisors

Operations Supervisors report to the Operations Manager.

As the senior manager on shift (one per shift), the Operations Supervisor represents the Director, American Centrifuge Plant and has the authority and responsibility to make decisions, as necessary, to ensure safe operations, including shutdown and stop work authority and placing the plant in a safe condition. The Operations Supervisors are responsible for accumulation and dissemination of information regarding plant activities to the incident commander during emergencies, and making notification of events to regulatory agencies.

The Operations Supervisors are responsible for providing operational support of centrifuge machine assembly, transport, installation, pump down, integrated system testing, start-up, operation, and repair. The Operations Supervisors also direct the operation of systems within the facilities necessary to support enrichment operation. Operations Supervisors authorize the restart of equipment that has been shutdown in a routine fashion when the prerequisites and limitations of the associated operating procedure are met.

Operations Supervisors have, as a minimum, a high school diploma or satisfactory completion of the General Educational Development test, and three years of industrial/chemical/nuclear plant operations, maintenance, or engineering experience. Operations Supervisors must have one year of supervisory experience or completion of a supervisory training course.

The Operations Manager appoints Operations Supervisors, with the concurrence of the Manager, Enrichment Operations.

2.1.3.3.3 Maintenance Manager

The Maintenance Manager reports to the Manager, Enrichment Operations.

The Maintenance Manager is responsible for the safe and reliable performance of preventive and corrective maintenance and support services on facilities and equipment with the exception of centrifuge machines. This includes troubleshooting; maintenance of logs and records; work planning/control to initiate, screen, evaluate, and prioritize maintenance work; and coordinating shop maintenance. The Maintenance Manager is also responsible for integrated planning and scheduling. This includes managing daily work control activities, developing an integrated work schedule, and coordinating development of work control guidelines.

In the absence of the Manager, Enrichment Operations, the Maintenance Manager may be delegated the responsibilities and authorities of the Manager, Enrichment Operations. The Maintenance Manager has shutdown and stop work authority in any part of the operation for which he/she has responsibility. If such authority is exercised, the Maintenance Manager must concur with restart of shutdown operations.

The Maintenance Manager has, as a minimum, a bachelor's degree in engineering or the physical sciences or equivalent technical experience, and four years of nuclear experience.

The Maintenance Manager is appointed by the Manager, Enrichment Operations, with concurrence from the Director, American Centrifuge Plant.

2.1.3.3.3.1 Maintenance Supervisors

Maintenance Supervisors report to the Maintenance Manager.

Maintenance Supervisors are responsible for supervising the maintenance of electrical equipment; electronic and pneumatic instrumentation and controls; and computers and programmable controllers. Maintenance Supervisors are also responsible for supervising mechanical maintenance (i.e., valve, pump, and mechanical repair and replacement). In addition, these supervisors are responsible for supervising other maintenance activities (i.e., painting, carpentry, sheet metal, and machinist activities). The Maintenance Supervisors have shutdown and stop work authority in any part of the operation for which they have responsibility.

Maintenance Supervisors have, as a minimum, a high school diploma or satisfactory completion of the General Educational Development test, and three years of industrial/chemical/nuclear plant operations, maintenance, or engineering experience. Maintenance Supervisors must have one year of supervisory experience or completion of a supervisory training course.

The Maintenance Manager appoints Maintenance Supervisors.

2.1.3.3.4 Shift Crew Composition

The minimum operating shift crew consists of an Operations Supervisor, a Radiation Protection/Industrial Hygiene technician, and one operations technician per process building. Other personnel, such as NCS, will be available on an as needed basis.

2.1.4 Vice President, Chief Information & Security Officer

The Vice President, Chief Information & Security Officer, located at headquarters, reports to the Executive Vice President and Chief Operating Officer.

The Vice President, Chief Information & Security Officer, is responsible for the strategic direction of information technology programs as well as overall physical and data security. The Vice President, Chief Information & Security Officer has shutdown and stop work authority for activities not being conducted in accordance with applicable security requirements. If such authority is exercised, the Vice President, Chief Information & Security Officer, must concur with restart of shutdown operations.

The Vice President, Chief Information & Security Officer has, as a minimum, a bachelor's degree or equivalent technical experience, six years security experience, and ten years of management experience, which may be concurrent with the security experience.

The USEC Board of Directors appoints the Vice President, Chief Information & Security Officer.

2.1.4.1 Security Manager

The Security Manager, located at the ACP, reports to the office of the Vice President, Chief Information & Security Officer.

The Security Manager is responsible for the ACP safeguards and security services. The Security Manager has direct access to the Director, American Centrifuge Plant concerning security matters and has shutdown and stop work authority for activities not being conducted in accordance with applicable security requirements. If such authority is exercised, the Security Manager must concur with restart of shutdown operations.

The Security Manager has, as a minimum, a bachelor's degree or equivalent technical experience, and four years security experience.

The Vice President, Chief Information & Security Officer appoints the Security Manager, with the concurrence of the Director, American Centrifuge Plant.

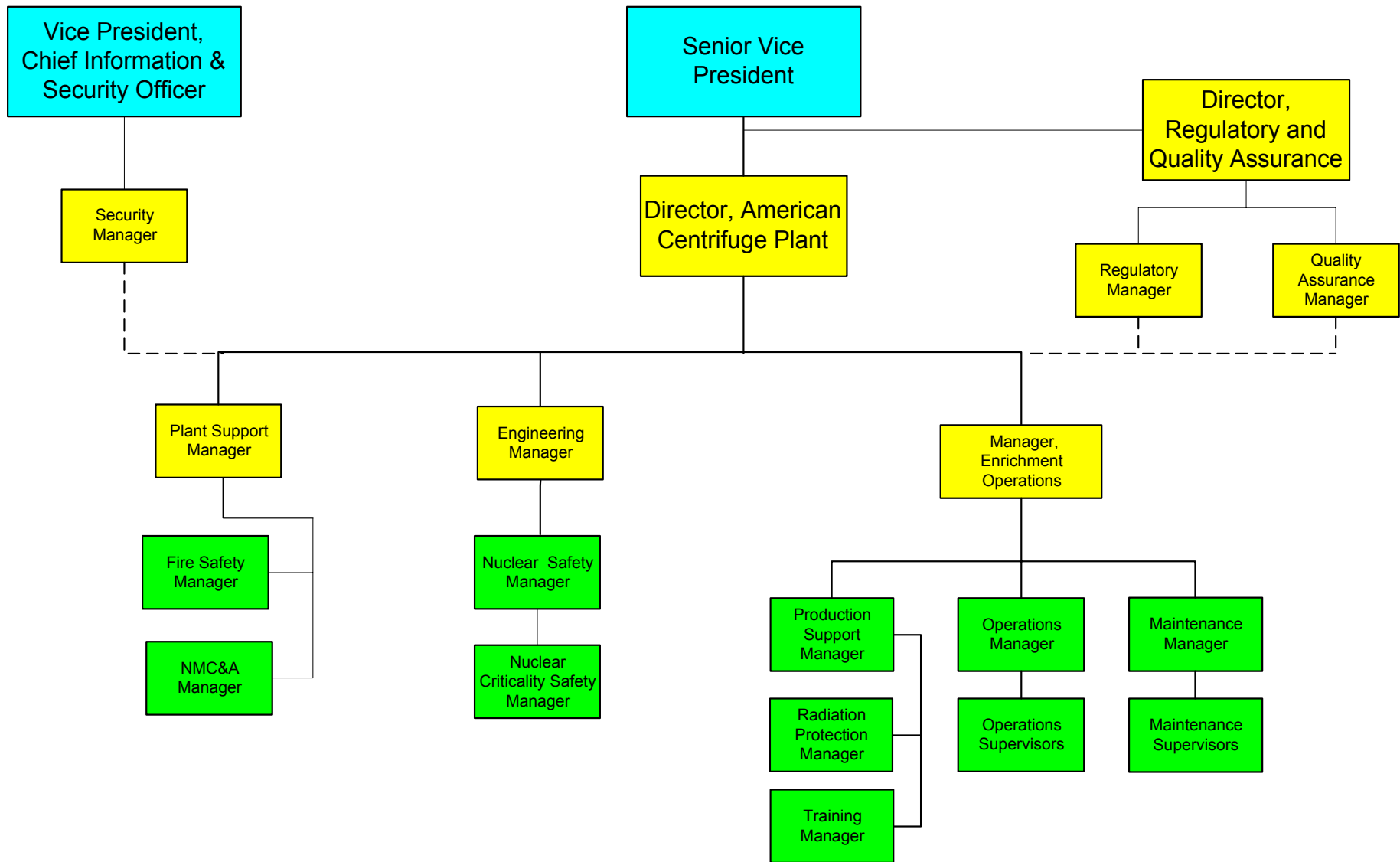


Figure 2.1-1
American Centrifuge Plant Organization Chart

2.2 Management Controls

USEC has established management measures with associated policies, administrative procedures, and management controls to ensure the ACP equipment, facilities and procedures; the staff (including training and qualifications); and the programs provide for the protection of the health and safety of workers and the public, protection of the environment, and for the common defense and security. Management controls have been established to maintain configuration management of the plant. These controls are described in Section 11.1 of this license application. Organizations with environmental, health, nuclear safety, safeguards, security, and quality responsibilities have been established with a reporting chain, independent from the operations organization. Effective lines of communication and authority among the organizations involved in the engineering, environmental, safety, and health, and operations functions of the plant are clearly defined.

The management controls established by USEC for the ACP include policies, management systems, and administrative procedures that are communicated to plant personnel. Policies related to the protection of health and safety of workers and the public, protection of the environment, and providing for the common defense and security are discussed in pertinent sections of this license application. Activities that are essential for effective implementation of the environmental, safety, and health functions are documented in approved, written procedures, prepared in compliance with a document control program. Procedure development and document control are described in Section 11.4 of this license application and Section 5.0 and 6.0 of the QAPD.

Management measures required to ensure the availability and reliability of items relied on for safety (IROFS) are described in Chapter 11.0 of this license application. Controls specific to plant programs are identified in the QAPD, Fundamental Nuclear Materials Control Plan, and Security Program for the American Centrifuge Plant.

The commitment tracking and Corrective Action Programs are integrated to prioritize ACP actions consistent with their safety and safeguards significance. Any person working in the plant may report potentially unsafe conditions or activities by submitting a condition notification. Reported concerns are investigated, assessed, and resolved as described in Section 11.6 of this license application.

Where safety, security or safeguards might be adversely impacted by cost or schedule considerations, it is the policy of USEC to subordinate cost and schedule considerations to ensure adequate treatment of safety and safeguards in full compliance with applicable regulatory requirements.

The integration of ACP operations and the various programs and requirements is accomplished through a variety of management practices, including:

- Staff meetings to discuss issues and policy implementation;
- Review of performance indicators;
- Review of identified events or conditions;
- Multi-discipline reviews by the Plant Safety Review Committee (PSRC); and
- Work permit systems that provide the integration in the field of various health, safety, and environmental program requirements and hazard evaluations.

Additionally, oversight of the integration of various program elements is provided by the QA organization.

Letters of agreement exist with off-site emergency resources (i.e., fire, police, ambulance/rescue units, and medical services). These interface agreements are addressed in more detail in the Emergency Plan for the American Centrifuge Plant.

2.2.1 Plant Safety Review Committee

The PSRC performs multi-discipline reviews of day-to-day and proposed activities to ensure that these activities are and/or will be conducted in a safe manner. The PSRC advises the Director, American Centrifuge Plant on matters related to Radiation Protection, Nuclear Safety, Chemical Safety, Fire Safety, and Environmental Protection. The specific membership, qualifications, meeting frequency, quorum, functions, responsibilities, and required records are provided in a plant procedure. Auditing and oversight of PSRC activities is the responsibility of the QA Manager.

Subcommittees may be established by the PSRC chairperson to provide assistance in conducting reviews and assessments as described in the PSRC procedure. The PSRC chairperson approves the subcommittee procedures, membership, and member qualifications. The PSRC maintains the overall responsibility for any required reviews.

2.3 Pre-operational Testing and Initial Start-up

Specific plans have been established to ensure the safe and efficient turnover, testing, and start-up of centrifuge machines, equipment, and support systems. These plans cover the transition from the refurbishment/construction phase to the operations phase.

The Engineering Manager is responsible for development and implementation of testing to provide for the turnover and acceptance of equipment and systems from contractors/vendors to USEC.

The Operations Manager is responsible for the development and execution of the Integrated Systems and Test Plans (ISTPs). The Engineering Manager may assist in the development of ISTPs. The ISTPs demonstrate the proper operation of completed systems to ensure the systems meet their intended design functions. The Operations Manager is also responsible for the testing, initial start-up, and operation of the centrifuge machines, equipment, and support systems. Documentation of testing is maintained in accordance with records management and document control requirements, and is available for NRC review.

2.3.1 Pre-operational Testing Objectives

The overall objectives of the pre-operational test program are to ensure that the facilities and systems, including the IROFS:

- Have been adequately designed and constructed;
- Meet contractual, regulatory, and licensing requirements;
- Do not adversely affect worker or public health and safety; and
- Can be operated in a dependable manner so as to perform their intended functions.

2.3.2 Turnover, Functional, and Initial Start-up Test Program

The refurbishment/construction contractor(s) is responsible for completion of as-built drawing verification; purging/flushing; cleaning; hydrostatic or pneumatic testing; system turnover; and initial calibration of instrumentation in accordance with procedures, design documents, and installation specifications. As systems or portions of systems are turned over to USEC, acceptance testing is performed in accordance with established schedules. The Engineering Manager is responsible for coordination of turnover and acceptance testing.

Integrated systems testing, as a minimum, includes system or component tests required by the pertinent design codes or QAPD that were not performed by the refurbishment/construction contractor(s) prior to turnover to USEC. The testing that is performed is commensurate with the system or component's quality level and is principally associated with IROFS, but may also include other tests on systems or components that USEC deems appropriate for financial, reliability, or other reasons. Integrated systems tests include the testing that is necessary to demonstrate that the facility, system, or component is capable of performing its intended function. The Operations Manager is responsible for coordinating the ISTP for the ACP. The integrated systems tests are performed following completion of construction; flushing; hydrostatic or pneumatic testing; system turnover; and initial calibration of required instrumentation. Scheduling of the testing is such that it generally occurs prior to UF₆ introduction. Other pre-operational

tests, not required prior to UF₆ introduction, may be performed following introduction of UF₆ to the process system.

The purpose of initial start-up testing is to ensure structures, systems, and components will perform their intended design functions in a safe and controlled manner. Examples of initial start-up tests include the leak testing, evacuation, start-up, and filling of a centrifuge machine.

2.4 References

None