

Region III

70-36

COMBUSTION ENGINEERING



PDR: LTR. ONLY

JAR/87/5025
September 11, 1987

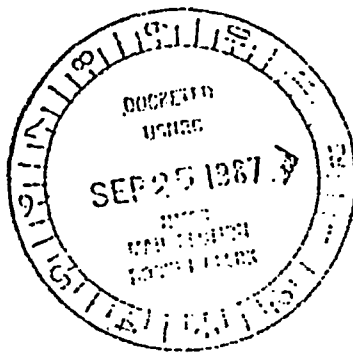
Ray Jackson
Licensing Branch
USNRC Division of Safeguards and Transportation NMSS
Willste Building
7915 Eastern Avenue
Silver Spring, Maryland 20910

Docket 70-36

Dear Mr. Jackson:

In response to your request for additional information and clarifications, enclosed are revised pages to our 10 CFR74.31 Fundamental Nuclear Material Control Plan. These revised pages are designated as Revision 1 and are dated June 1987.

Response to several comments which are not covered by a page revision is attached.



Very truly yours,

COMBUSTION ENGINEERING, INC.

H. E. Eskridge

H. E. Eskridge
Supervisor, Nuclear Licensing,
Safety and Accountability

/eg
Enclosure

N-10

Information in this record was deleted
in accordance with the Freedom of Information
Act, exemptions 4
FOIA-2004-0234

FEE NOT REQUIRED

Power Systems
Combustion Engineering, Inc.

Post Office Box 107
Highway P
Hematite, Missouri 63047

(314) 937-4691
(314) 296-5640

same as
07000036570M

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Responses to the NRC's comments on CE-Hematite's Part 74 FNMC Plan that weren't covered by a revision to the FNMC Plan are as follows:

Comment 14

A series is more than two consecutive measurements outside of the same .05 limit. "Numerous" is enough measurements to require an investigation from the periodic analyses listed on Page I. 4-5.

Comment 15

The lot calculated average is the weighted average %U-235 for a lot using the weight, %U, and measured or traceable isotopic for each component in the lot.

The type of method used for isotopic analysis is described on Page II. 4-1. The accuracy of this method is $\pm .001\%$ relative.

The isotopic analyses for "actual lot analysis" are on the "regular production samples" as mentioned in the first paragraph of Page I. 4-10.

Comment 16

The moving range is the average range (\bar{R}) of the ranges from one standard measurement to the next.

Comment 59

The Gravimetric %U, Titrimetric %U, and Mass Spectrometric %U-235 methods all report values to the nearest .001 W/O which is the "sensitivity" of the methods.

Comment 60

Calibration curves have been established with known weights of U-235 for the various types of items that are measured by the gamma counter. The curves cover the expected range of grams U-235 for each type of item. The maximum point from all of these curves is 100 grams U-235 for a certain type of filter. The materials used for this curve are retained for periodic re-calibrations.

The 1.0 and 4.5 gram U-235 standards will verify that the instrument calibration has not shifted. If these % standards indicate that the instrument has shifted, the curves for the other items can be re-calibrated.

Three tanks with 550, 850, and 2000 liter capacities are occasionally used for MC&A measurement of volume. These tanks have all been calibrated by documented procedures. The contribution to SEID from these measurements is insignificant.

Page Two

Comment 63

The Bias B1 on line 3 is computed by the formula on line 8.

Comment 65

The requested annex example of the measurement standard error for a typical inventory difference will be prepared and forwarded for review within 30 days.