

April 5, 2006

Mr. Steven A. Toelle
Director, Nuclear Regulatory Affairs
U. S. Enrichment Corporation
2 Democracy Center
6903 Rockledge Drive
Bethesda, MD 20817

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION - PADUCAH GASEOUS
DIFFUSION PLANT - CERTIFICATE AMENDMENT REQUEST DATED
JANUARY 4, 2006 (TAC L52571)

Dear Mr. Toelle:

We have reviewed your letter dated January 4, 2006, which included a request for certificate amendment for the Paducah Gaseous Diffusion Plant.

We have determined that additional information is necessary to complete our review. The enclosure to this letter describes the additional information that is needed. Please respond to this request for additional information within 30 days, or provide notification if a longer period of time will be required to provide your response.

For administrative purposes, we are closing TAC L52571 with this letter, and will open a new TAC number upon receipt of your response.

If you have any questions regarding this request, please contact me at (301) 415-7254 or via e-mail to dem1@nrc.gov.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's Agencywide Documents Access and Management System (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>.

Sincerely,

/RA/

Dan E. Martin, Project Manager
Uranium Processing Section
Fuel Cycle Facilities Branch
Division of Fuel Cycle Safety
and Safeguards
Office of Nuclear Materials Safety
and Safeguards

Docket No.: 70-7001
Certificate No.: GDP-1

Enclosure: Request for Additional Information

cc: Mr. Randall M. DeVault, DOE-Oak Ridge
Mr. Steve Penrod, USEC-Paducah

S. Toelle

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Mr. Steve Penrod, USEC-Paducah

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REQUEST FOR ADDITIONAL INFORMATION

PADUCAH GASEOUS DIFFUSION PLANT
REQUEST FOR CERTIFICATE AMENDMENT
DATED NOVEMBER 10, 2005

- 1) Footnote "a" to Table 3.2.2.1, Minimum Staffing Requirements, would allow staffing at less than the minimum requirement for up to four hours to accommodate unexpected absence. If the minimum requirement for Health Physics (HP) personnel is reduced to one, footnote "a" would allow that no HP personnel are on-site occasionally.

Please provide an evaluation of the potential frequency for this to occur, and the impact on plant safety if an event requiring HP support were to occur when no HP personnel were present, such as a contamination or over-exposure event.

- 2) United States Enrichment Corporation (USEC) states in the January 4, 2006, Certificate Amendment Request (CAR), that during normal working hours approximately 10 to 20 HP personnel are available on-site, easily meeting the current HP minimum staffing requirement. However, USEC maintains that on nights, weekends, and holidays, it is not necessary to require 2 HP personnel to be on-site. USEC maintains there is no safety basis for this requirement, and that it causes USEC to incur additional call in expenses without a commensurate safety benefit.

The CAR does not provide any information to quantify USEC's expected benefit if the CAR is approved. Also, USEC does not describe what work is accomplished, if any, by the excess HP personnel on the nights, weekends, and holidays they are required to be at the plant but not needed for HP duties. Please describe how frequently required HP personnel do not perform HP duties, what other work they do perform, and the amount of idle time wasted, if any, due to the requirement to have 2 HP personnel on-site. Please provide an estimate of the expected benefit to USEC if the minimum staffing requirement is reduced to 1 HP person, apportioned among normal working hours, nights, weekends, and holidays. The evaluation should consider the need to provide other personnel to replace HP personnel, if the requirement for HP personnel is reduced. An estimate in the form of HP person-hours will be most useful. It is recognized that a response to this request for additional information may be somewhat imprecise in that the necessary data may not be readily available.

- 3) USEC states there is no safety basis for requiring 2 HP personnel to be on-site. Please address the possibility that a lone HP staff person could be injured in an incident requiring HP support, and the potential consequences of trained HP support being unavailable.
- 4) USEC states that E-Squad personnel may be called upon to monitor contamination and personnel radiological exposure in an emergency. Please describe the training and experience requirements for E-Squad personnel that enable them to perform these HP functions. Please provide a description of the number of HP-trained E-Squad personnel likely to be on-site on nights, weekends, and holidays.

Enclosure