

R2/E56

April 26, 2002

Ms. Nancy Blair Parr
Licensing Project Manager
Westinghouse Electric Company, LLC
Drawer R
Columbia, South Carolina 29250

SUBJECT: WESTINGHOUSE ELECTRIC COMPANY LLC - (TAC NO. 31562) -
AMENDMENT 30 - AUTHORIZE THE USE OF ICRP 68 ALI/DAC

Dear Ms. Parr:

In accordance with your application dated October 15, 2001, and pursuant to Part 70 to Title 10 of the Code of Federal Regulations, Materials License SNM-1107 is hereby amended to grant an exemption authorizing the use of Annual Limit on Intake (ALI) and Derived Air Concentration (DAC) values based on dose coefficients adopted by International Commission on Radiological Protection (ICRP) and published in ICRP Publication No. 68. In granting the exemption to 10CFR 20.1201(d), we have determined, in accordance with 10 CFR 20.2301, that the exemption is authorized by law and will not result in undue hazard to life or property

Materials License SNM-1107 is also hereby amended, pursuant to your request, to grant an exemption to 10 CFR Part 70.5 to authorize the use of electronic filing. In granting this exemption, we have determined, in accordance with 10 CFR Part 70.17(a), that the exemption is authorized by law, will not endanger life or property or the common defense and security and is otherwise in the public interest.

Materials License SNM-1107 is also amended to include the administrative, organizational and procedural changes requested in your application of October 15, 2001.

Accordingly, Safety Condition S-1 has been revised to include the date of October 15, 2001.

All other conditions of this license shall remain the same.

Enclosed are copies of the amended Materials License SNM-1107 and the Safety Evaluation Report, which includes the Categorical Exclusion.

If you have any questions regarding this matter, please contact Donald Stout of my staff at (301) 415-5269 or by e-mail at des1@nrc.gov.

Sincerely,
/RA/

Daniel M. Gillen, Chief
Fuel Cycle Facilities Branch
Division of Fuel Cycle Safety and Safeguards
Office of Nuclear Material Safety and Safeguards

Docket 70-1151
License SNM-1107
Amendment 30

Enclosures: 1. Materials License SNM-1107
2. Safety Evaluation Report

Information in this record was deleted
in accordance with the Freedom of Information
Act, exemptions 2
FOIA-2006-0026

I-15

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Fuel Cycle Facilities branch
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Office of Nuclear Material Safety and Safeguards

Docket 70-1151
License SNM-1107
Amendment 30

DISTRIBUTION: (Control No. T40S) [COMPLETE] Accession No. ML021270336
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OFC	FCFB	E	FCFB	C	FCFB	E	OGC	FCFB	FCFB	
NAME	DStout *		MLamastra *		PShea *		STreby	LRoché	DGillen	
DATE	4/15/02		4/15/02		4/15/02		4/24/02	04/25/02	04/26/02	

* See previous concurrence

MATERIALS LICENSE

Pursuant to the Atomic Energy Act of 1954, as amended, the Energy Reorganization Act of 1974 (Public Law 93-438), and Title 10, Code of Federal Regulations, Chapter I, Parts 30, 31, 32, 33, 34, 35, 36, 39, 40, and 70, and in reliance on statements and representations heretofore made by the licensee, a license is hereby issued authorizing the licensee to receive, acquire, possess, and transfer byproduct, source, and special nuclear material designated below; to use such material for the purpose(s) and at the place(s) designated below; to deliver or transfer such material to persons authorized to receive it in accordance with the regulations of the applicable Part(s). This license shall be deemed to contain the conditions specified in Section 183 of the Atomic Energy Act of 1954, as amended, and is subject to all applicable rules, regulations, and orders of the Nuclear Regulatory Commission now or hereafter in effect and to any conditions specified below.

Licensee	
1. Westinghouse Electric Company LLC	3. License Number SNM-1107, Amendment 30
2. P.O. Box 355 Pittsburgh, Pennsylvania 15230-0355	4. Expiration Date November 30, 2005
	5. Docket No. 70-1151 Reference No.

6. Byproduct Source, and/or
Special Nuclear Material7. Chemical and/or Physical
Form8. Maximum amount that Licensee
May Possess at Any One Time
Under This License

Ex. 2

A. U-235

B. U-235

C. U-233

D. Pu-238,
Pu-239

E. Plutonium

A. Any

B. Any, except
metal, enriched
to not more
than 5.0 w/o

C. Any

D. Sealed sources

E. Feedstock with
transuranics and
fission products

A.

B.

C.

D.

E.

9. Authorized place of use: The licensee's existing facilities at Columbia, South Carolina.
10. This license shall be deemed to contain two sections: Safety Conditions and Safeguards Conditions. These sections are part of the license and the licensee is subject to compliance with all listed conditions in each section.

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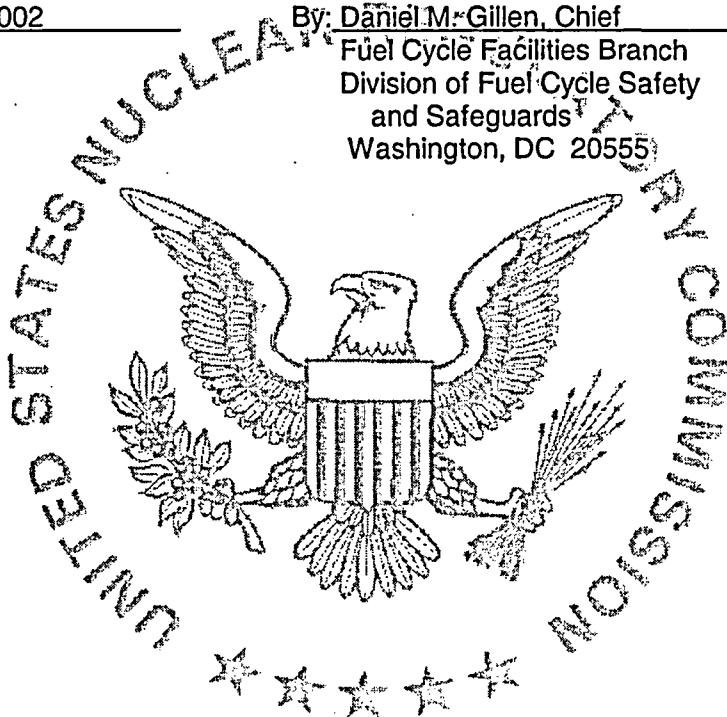
11. Deleted by Amendment 20, dated November 1999.

FOR THE NUCLEAR REGULATORY COMMISSION

/RA/

Date: April 26, 2002By: Daniel M. Gillen, Chief

Fuel Cycle Facilities Branch
Division of Fuel Cycle Safety
and Safeguards
Washington, DC 20555



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SAFETY CONDITIONS

- S-1. Authorized use: For use in accordance with statements, representations, and conditions in the license application dated April 30, 1995, and supplements dated August 4 and 25, September 25, 1995; August 30, 1996; July 14, 1997; name change amendment December 22, 1997; June 30, July 23, 1998; name change amendment September 28, 1998; August 16, 1999; and January 28, July 24, September 8, November 21, 2000; and January 12, February 19, March 12, March 20, and March 27, April 30, and October 15, 2001.
- S-2. Criticality Safety Evaluations (CSEs) and Criticality Safety Analyses (CSAs) will define the interim criticality safety bases utilized throughout the CFFF. All CSEs/CSAs will be upgraded and/or completed in accordance with all applicable commitments in Chapter 6.0 of the License Application and all other regulatory requirements. Summaries of the CSEs/CSAs (in the format of License Annexes) will be submitted to NRC for review and approval. All completed CSEs/CSAs will be independently peer-reviewed in accordance with all applicable regulatory requirements and related procedures. Configuration control data packages for ongoing changes to facility structures, systems and components, and controls will be filed with their respective CSEs/CSAs to provide a substantially complete "living" framework for system Integrated Safety Assessments (ISAs) that will ultimately become the Final CFFF Design Safety Basis described in Chapter 4.0 of the License Application.
- S-3. The licensee shall maintain and execute the response measures in the Site Emergency Plan, dated April 30, 1990, and revisions dated March 31 and September 30, 1992; March 25, August 15, and September 30, 1994; January 9, February 17, August 17, and October 23, 1995; or as further revised by the licensee consistent with 10 CFR 70.32(i).
- S-4. Deleted by Amendment 12, April 1998.
- S-5. By December 31, 2000, tables of Environmental/Radiological and Chemical/Fire controls will be added to the blank sections titled "Environmental Protection and Radiation Safety Controls" and "Chemical Safety and Fire Safety Controls" in the Enhanced Criticality Safety Evaluation License Annexes submitted in accordance with Safety Condition S-2.
- S-6. For Amendment - 29, any "additional safety margin" information that the licensee provided to the NRC (see Table XII) to demonstrate an adequate safety basis, shall be identified and have sufficient management measures to ensure that the margin being relied upon is maintained.
- S-7. In accordance with the information provided to the NRC during their site visit, the licensee shall maintain the following "additional safety margin" for Moderation control in the mixer by: (1) maintaining a low amount of moisture during the normal process; (2) having a low amount of poreformer added (i.e., only need up to 1 kg poreformer) to the mixer during the normal process; (3) allowing only 45% of the NCS k-effective poreformer limit available to the operator at any one time; and (4) allowing only one polypak of poreformer to be scanned/dumped into one mix of the blender.
- S-8. Prior to the introduction of Special Nuclear Material into the nuclear absorber mixer / erbia blender,
- A. the licensee shall demonstrate to the NRC that the NCS computer code functions correctly at low H/X ratios, specifically, that the k-effective limits described in the submittal for the mixer are accurate.

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- B. (1) ChAMPS shall be fully tested (i.e., verification and validation) and (2) the Auto Dump Interlock shall be fully tested for erbia/uranium powder blending (i.e., similar to the functional verification and testing being performed for the current ADU Auto Dump Interlock).
- C. the licensee shall verify; (1) the availability and reliability of necessary administrative and engineered fire protection controls identified as safety significant controls (SSC's) or items relied on for safety (IROFS), and, (2) fire protection design features and controls important for defense-in-depth for fire protection and the acceptable risks for operations.



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SAFEGUARDS CONDITIONS**SECTION 1.0 -- MATERIAL CONTROL AND ACCOUNTING**

- SG-1.1 The licensee shall follow pages i through xx and Chapters 1.0 through 9.0 of its "Fundamental Nuclear Material Control Plan for the Columbia Fuel Fabrication Facility," which has been revised as indicated by Revision 33 (dated March 1, 2001). Any further revision to this Plan shall be made only in accordance with, and pursuant to, either 10 CFR 70.32(c) or 70.34.
- SG-1.2 Operations involving special nuclear material which are not referenced in the Plan identified in Condition SG-1.1 shall not be initiated until an appropriate safeguards plan has been approved by the Nuclear Regulatory Commission.
- SG-1.3 In lieu of the requirements contained in 10 CFR 74.13(a)(1) and (a)(2) to use the Forms DOE/NRC-742 and 742C, the licensee may use computer generated forms provided all information required by the latest printed instructions for completing the particular form is included.
- SG-1.4 In lieu of the requirements contained in CFR 70.54 and 74.15 to use the DOE/NRC Form-741, the licensee may use computer generated forms provided all information required by the latest printed instructions for completing the particular form is included.
- SG-1.5 Deleted Per Amendment 3, August 1996 Commitment now contained in licensee's Fundamental Nuclear Material Control Plan.
- SG-1.6 Notwithstanding the requirements of the FNMC Plan identified in License Condition SG-1.1, the licensee may use (1) a single standard for measurement control (including daily control limit monitoring and bias corrections) for any linear-response tube or rod scales, in any initially demonstrated to be linear over its range of use within the discrimination of the scale by calculating a bias at four levels across the range of use and demonstrating that the four results are not statistically different, and (2) that the continued linearity of response of the scales is verified by monthly calibration against at least four traceable standards covering the range of use.
- SG-1.7 Notwithstanding the requirements contained in Sections 5.2.2 and 5.2.3 of the licensee's Fundamental Nuclear Material Control Plan, the licensee is exempted from physical inventory requirements relative to the material identified in Condition S-4; provided the conditions and commitments contained in the licensee's November 30, 1993, letter (identification # NRC-93-036) are satisfied.
- SG-1.8 Notwithstanding the requirement of Section 6.2.1(a).5 of the licensee's Fundamental Nuclear Material Control Plan to unpackage and perform an item count upon receipt of special nuclear material, the licensee is exempted from such requirement relative to the material identified in Condition S-4; provided the conditions and commitments contained in the licensee's November 30, 1993, letter (identification # NRC-93-036) are satisfied.

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SG-1.9 Notwithstanding the requirement of Section II.A.7, block U, of NUREG/BR-0006, which is incorporated via 10 CFR 74.15, to complete receiver's measurements of scrap receipts (following recovery processing) within 60 days of receipt, the licensee shall not be subject to any time limit relative to recovering and measuring received UF₆ heels when the block U action code (of DOE/NRC Form 741) is used to book such receipts.

SG-1.10 With respect to Section 5.1.4 (b) of the Plan identified by Condition SG-1.1, "allowed number" within the phrase "allowed number of defects" is hereby specified as being:

- (i) up to two defects when each item within a batch of items has an assigned value equal to or less than 50 grams U-235;
- (ii) no more than one defect when each item within a batch of items has an assigned value of less than 500 grams U-235, but one or more items has an assigned value in excess of 50 grams U-235; and
- (iii) zero defect when any item within a batch of items contains 500 or more grams U-235.

SG-1.11 Notwithstanding the first paragraph of Section 7.1 of the Plan identified by Condition SG-1.1, the licensee shall conduct shipper-receiver comparisons on all SNM materials received (regardless of whether booked on the basis of receiver's or shipper's values), except for those materials identified in Section 7.1 of NUREG-1065 (Rev. 2) as being exempted from shipper-receiver comparisons.

SECTION 2.0 -- PHYSICAL PROTECTION OF SNM OF LOW STRATEGIC SIGNIFICANCE

SG-2.1 The licensee shall follow the physical protection plan entitled, "Physical Security Plan," Revision 28 dated April 7, 2000 (letter dated April 7, 2000); and as it may be further revised in accordance with the provisions of 10 CFR 73.32(e).

SECTION 3.0 -- INTERNATIONAL SAFEGUARDS

SG-3.1 The licensee shall follow Codes 1 through 6 of Transitional Facility Attachment No. 5A dated August 31, 1988, to the US/IAEA Safeguards Agreement. Such Transitional Facility Attachment shall be interpreted in accordance with Conditions SG-3.1.1 through SG-3.1.7.

SG-3.1.1 With respect to Transitional Facility Attachment Code 2:

The reference design information is that dated by the licensee on October 14, 1985. "Information on the Facility" also includes other facility information submitted via Concise Notes in accordance with 10 CFR 75.11(c).

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SG-3.1.2 With respect to Transitional Facility Attachment Code 2.2:

Substantive changes to the information provided in the Columbia Plant Design Information Questionnaire (DIQ) means those changes requiring amendment of the Transitional Facility Attachment. Such changes shall be provided by letter to the NRC Office of Nuclear Material Safety and Safeguards at least 70-days in advance of implementation.

Non-substantive changes to the information in the DIQ means those changes not requiring amendment of the Transitional Facility Attachment. Such changes shall be provided by Concise Note (From DOE/NRC-740M) within 30 days of receiving notification from the NRC that the facility has been identified under Article 39(b) of the US/IAEA Safeguards Agreement.

The types of modifications with respect to which information is required under 10 CFR 75.11, (to be submitted in advance), are those items stated in Code 2.2, specifically:

- (a) "Any change in the purpose of type of facility" means:

Any deviation from the described activities involving special nuclear material and any change to the maximum enrichment and/or quantities of U-235 currently authorized by License No. SNM-1107, and/or as described in Paragraph 5 of the Design Information Questionnaire (DIQ) dated October 14, 1985, or as modified in accordance with 10 CFR 75.11(c). Included also is any deviation from the described special nuclear material (SNM) production activities described in paragraph 6 of the DIQ dated October 14, 1985, or as modified in accordance with 10 CFR 75.11(c).

- (b) "Any changes in the layout of the facility which affects safeguards implementation of the provisions of the Protocol" means:

Any change in the existing facility and/or site layout or new addition affecting any activity involving SNM as described in Paragraphs 10 and 11 (per the referenced attachments of the DIQ dated October 14, 1985, or as modified in accordance with 10 CFR 75.11(c). Included also is any modification to, or deviation from, the data provided in Paragraphs 13 and 14 (per the referenced attachments) of the DIQ dated October 14, 1985, or as modified in accordance with 10 CFR 75.11(c).

- (c) "Any change that makes the selected Key Measurement Points (KMPs) (as described in Code 3.1.2) inadequate for the Agency's accounting purpose" means:

Any change to the KMPs as described in Code 3.1.2 of the Westinghouse-Columbia Transitional Facility Attachment to the US/IAEA Safeguards Agreement, or as modified in accordance with 10 CFR 75.11(c), that results in any KMP alteration affecting the purpose of KMPs as stipulated by 10 CFR 75.4(m).

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- (d) "Any change in the physical inventory procedures that would adversely affect the inventory taking for the Agency's accounting purposes" means:

Any change to the description data contained in Paragraph 34 (per the referenced attachments) of the DIQ dated October 14, 1985, or as modified in accordance with 10 CFR 75.11(c), that would not permit the Agency to conclude an SNM material balance for the Westinghouse-Columbia facility.

- (e) "Introduction of a significantly less accurate analytical method for accounting purposes" means:

Any recalculation of the "Relative Errors-Random and Systematic" as listed in Attachment 36.2 referenced in Paragraph 36 of the DIQ dated October 14, 1985, or as modified in accordance with 10 CFR 75.11(c), that results in the estimates of the random and systematic errors being affected by a factor of two or more.

- (f) "Decrease in the frequency of calibrating measuring equipment if it significantly decreases the accuracy of the materials accounting system" means:

Any change that results in the estimates of the systematic error being affected by a factor of two or more.

- (g) "Any change in the statistical procedures used to combine individual measurement error estimates to obtain limits of error for shipper/receiver (S/R) differences and material unaccounted for (MUF)" means:

Any deviation from (or modification of) the equations and/or calculations outlined in Attachments 37.1, 37.2, and 37.3 referenced in Paragraph 37 of the DIQ dated October 14, 1985, or as modified in accordance with 10 CFR 75.11(c).

SG-3.1.3 With respect to Transitional Facility Attachment Code 3.1.2:

KMP* -- This is a KMP in which all shipper receiver differences (SRDs) must be recorded and reported even if numerically zero. SRDs are computed and reported by the Nuclear Materials Management and Safeguards System upon receipt of the receiver's measurement results.

SG-3.1.4 With respect to Transitional Facility Attachment Code 4:

The licensee shall use the material composition codes documented in the DIQ dated October 14, 1985, and as modified by Concise Notes. Further, notwithstanding any other requirements for advance notification and/or reporting, the licensee may add or delete composition codes for nuclear material routinely processed and on inventory at CFFF immediately upon telephone notification to the Office of Nuclear Material Safety and Safeguards. Follow-up documentation, in the form of a Concise Note accompanied by appropriate changes to Table 1 of Attachment 34.8 to the DIQ shall be submitted within three regular workdays of the telephone notification.

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SG-3.1.5 With respect to Transitional Facility Attachment Code 4.1:

Measured discards should be reported as an SN (Shipment to non-safeguards facility) when shipped off-site to an authorized burial ground. (The IAEA system will not process measured discards as loss/disposal (LDs) when they are shipped off-site).

SG-3.1.6 With respect to Transitional Facility Attachment Code 5.1.1:

For inventory changes, time of recording, "upon" means: No later than the next regular workday (Monday through Friday).

For those occasions where natural or depleted uranium is inadvertently enriched above 0.711 percent through commingling with residual enriched uranium in process equipment, the resultant product shall be considered as being produced through a blending operation and the material category change shall be recorded upon obtaining measurement confirmation that a material category change has occurred.

SG-3.1.7 With respect to Transitional Facility Attachment Code 6.2.2:

For Concise Notes describing the anticipated operational programme, "anticipated operational programme" means: Anticipated physical inventory schedule.

DOCKET: 70-1151

LICENSEE: Westinghouse Electric Company, LLC

SUBJECT: SAFETY EVALUATION REPORT: APPLICATION DATED OCTOBER 15, 2001

BACKGROUND

By letter dated October 15, 2001, Westinghouse Electric Company LLC (WEC) requested an amendment to its Special Nuclear Material License SNM-1107 to allow the use of Derived Air Concentration (DAC) and Annual Limit on Intake (ALI) values calculated using the new internal dosimetry models as described in ICRP 68. This is currently considered an exemption request from the requirements of 10 CFR Part 20. However, the Commission by Staff Requirement Memorandum (SRM) dated April 21, 1999, authorized the staff to grant such requests on a case-by-case basis. Included in the same letter was an exemption request to 10 CFR Part 70, Section 70.5 to send official correspondence to the Nuclear Regulatory Commission electronically and participate in the NRC's Electronic Information Exchange (EIE) program. The final request in this letter pertained to organizational and other administrative updates which are listed in detail below.

DISCUSSION

The basic limits on radiation exposures, as well as the minimum radiation protection practices required of any NRC licensee, are specified in 10 CFR Part 20, "Standards for Protection Against Radiation". Part 20 underwent a major revision in the 1980's, and the revised regulation was published as a proposed rule in December 1985. The final rule was published in the Federal Register on May 21, 1991, (56 FR 23391) and became mandatory for all licensees in January 1994.

One of the major changes incorporated in the revised Part 20 was the manner in which internal exposure to radioactive materials is regulated. Before the revision, NRC regulated internal exposures by limiting the amounts of radioactive materials that may be taken into the body over specified time periods. The revised Part 20 eliminated regulation based on intakes and, instead, regulated on the basis of the dose that resulted from those intakes. The internal dose from intake of radioactive material is referred to in Part 20 as the committed effective dose equivalent (CEDE). The change to regulation of dose instead of intake was prompted in part by similar changes in the recommendations provided by national and international bodies, and also by the desire to end the traditional treatment of internal and external doses as two distinct and separate entities. A consequence of the dose-based rule is that compliance would not necessarily be constrained by use of a specific set of parameters to calculate the dose. Part 20, in fact, allows certain adjustments to be made to the model parameters if specific information is available, such as adjustments when the particle size of airborne radioactive material is known, rather than using a default particle size. However, Part 20 also specifies certain protection requirements in the rule in terms of the quantities tabulated in Appendix B, the Annual Limit on Intake (ALI) and the Derived Air Concentration (DAC), rather than in terms of dose. Thus, requirements such as posting of airborne radioactivity areas, monitoring for intakes of radioactive materials, establishment of bioassay programs, and use of respirators are explicitly tied to the measurable quantities, rather than to a dose. This approach was taken in order to assure that these criteria would be easy to implement, and not impose an undue calculation burden on a licensee.

The models used in Part 20 to regulate internal dose are those described in ICRP Publications 26 and 30, adopted by ICRP in 1977 and 1978, respectively. Much of the basic structure of these

models was developed in 1966, although some of its components and parameters were altered somewhat between 1966 and their formal adoption by ICRP in 1978. In 1990 the final rule was published, in 1991 ICRP published a major revision of its radiation protection recommendations (ICRP 60). In the several years following this revision, ICRP published a series of reports in which it described the components of an extensively updated and revised internal dosimetry model. These reports include ICRP Publications 60 (1990), 66 (1993), 67 (1993), 68 (1994), 71 (1995), 72 (1995), and 78 (1997). Because of the way Part 20 was written, NRC licensees are not permitted to use the revised and updated internal dosimetry models.

Although the dose per unit intake calculated using the new models does not differ by more than a factor of about two from the values in Part 20 for most radionuclides, the differences are substantial for some, particularly for the isotopes of uranium, thorium, and some of the transuranic radionuclides. For example, for inhalation of insoluble uranium-235, the CEDE per unit intake calculated using the revised ICRP lung model is a factor about 5 times lower than that in Part 20. Because protective measures are based on hazard, and since hazard is proportional to dose, Part 20 requires significantly more protective measures when using uranium-235 than would be warranted based on the revised models. Another example, based on inhalation of insoluble thorium-232, the CEDE per unit intake calculated using the revised ICRP lung model is a factor about 15 times lower than that in Part 20. As mentioned above, Part 20 requires significantly more protective measures when using thorium-232 than would be warranted based on the revised models. The staff has concluded, during a recent amendment request, that the licensee's Radiation Safety Program is sufficiently sophisticated by training and expertise to utilize the ICRP Model in a manner equivalent to those listed in 10 CFR 20.1201(d), i.e, doses to less than NRC's regulatory limit of 5 rems. Therefore, WEC's request for an exemption under 10 CFR 20.2301 is acceptable because it gives its workers equivalent radiological protection as required by 10 CFR Part 20. Thus, the exemption is authorized by law and will not result in undue hazard to life or property.

In an August 6, 2001 letter from Melvin N. Leach, Chief, Fuel Cycle Licensing Branch, titled "Electronic Information Exchange (EIE) System", the NRC informed WEC of the voluntary program to submit official Part 70 communications electronically. The letter explained the necessity to request an exemption to 10 CFR Part 70, Section 70.5. WEC has chosen to participate in the EIE program and has requested an exemption to Section 70.5. Accordingly, page number 12.6 of their license has been revised to include the exemption that allows WEC to submit Part 70 communications electronically to the NRC per the August 6, 2001 letter from the NRC. This exemption is administrative in nature and is in accordance with NRC guidelines. Approval of this exemption is authorized by law and will not endanger life or property or the common defense and security and is otherwise in the public interest.

The October 15, 2001, letter from WEC also contained a request to approve the following administrative changes in its license application that involve organizational and program updates, and typographical and grammatical errors. The changes are listed below:

Page number 1.0

changed the word absorber "coating" to "addition" and specified that a minimum number of four diesel-powered standby generators are needed to meet the electrical requirements of the site,

Page numbers 1.4,1.5,2.0,2.2,2.3,2.5
updated the organizational structure,

Page numbers 1.9,1.10
updated site plan and key,

Page number 3.0
added reference to the new Corrective Action Process (CAPs) - which has incorporated the intent of the Safety Margin Improvement Program,

Page numbers 2.4, 3.12
updated regulatory training requirements to require refresher training on an annual basis instead of biennial, that will allow electronic copies of the training manual, and provide flexibility in the delivery method for supplementary instruction,

Page numbers 5.1 and 5.2
updated Radiation Work Permits (RWP) to include chemical permit criterion resulting in a Radiation and Chemical Work Permit (RCWP),

Page numbers 5.1, 5.3,5.4,5.5,5.8,5.9,5.10,5.11 and 12.4
revised the radiation dose equivalent calculation methods to use the annual limit on intake (ALI) and derived air concentration (DAC) values based on dose coefficients published by the International Commission on Radiological Protection (ICRP) as published in ICRP Publication No.68, and added authorization to use ICRP 68

Note: WEC's applicable radiological procedures will be modified to reflect these changes prior to implementation of the ALI-DAC exemption. Calculation of internal doses may incorporate these values for calendar year 2001. WEC may use more conservative (i.e., higher dose per unit intake) values, as internal action levels, or for other purposes as approved by WEC Management.

Page number 5.2
changed the word from "un-encapsulated" to "pellet" based on a new safety evaluation and revised ventilation system requirements,

Page number 5.7
included examples of un-encapsulated material, and,

Page number 8.2
deleted named reference to American Nuclear Insurers - necessary audits will be conducted by a non specified vendor.

ENVIRONMENTAL REVIEW

These changes are considered procedural and administrative in nature. The staff has determined that the proposed changes are categorically excluded from the requirement to prepare a site-specific environmental assessment. Therefore, in accordance with 10 CFR 51.22(c)(11), neither an environmental assessment nor an environmental impact statement is warranted for this action.

CONCLUSION

It is generally agreed among the national and international scientific community that the newer models provide more accurate dose estimates than the models used in Part 20. The NRC supports these types of dose estimates, and has authorized the staff to grant exemptions on a case-by-case basis. In view of this situation, the staff recommends approving the licensee's request to use the new models. Additionally, the request to transmit Part 70 official documents electronically is endorsed by the NRC and the staff recommends approving this exemption request. Staff also recommends approval of the page revisions for organizational changes, deletion of American Nuclear Insurers as the sole auditor for fire safety and apparent improvements in refresher training frequency and revised ventilation requirements.

The Region II inspection staff has no objection to this proposed action.

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