

August 31, 2011

ATTACHED ARE SLIDES WHICH  
WERE PRESENTED AT THE  
AUGUST 17, 2011 PART 40  
PUBLIC MEETING

# **Public Meeting**

## **Proposed Part 40 ISA Rulemaking**

**August 17, 2011**

# **Proposed Part 40 Rulemaking**

**Edward Lohr  
and  
Matthew Bartlett**

**Aug 17, 2011**

# Background

SRM SECY-07-0146

SRM SECY-10-0128



# ISA Threshold

How much  $\text{UF}_6$  is necessary before requiring an ISA?

2,000 kg

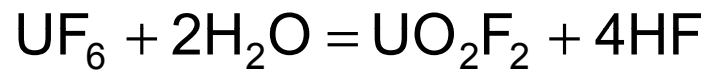
OSHA, in Appendix A of 29 CFR Part 1910.119, identifies threshold quantities of hazardous chemicals that “present a potential for a catastrophic event.”

HF has a value of 1,000 lbs (453 kgs)

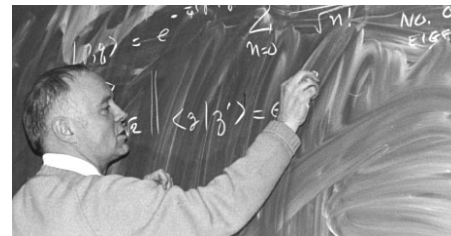
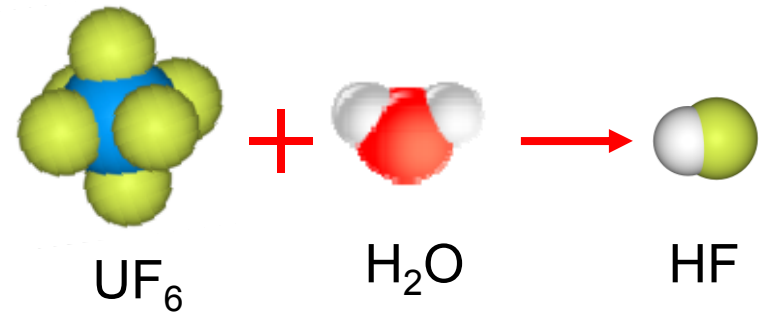
# ISA Threshold

Chemicals Produced  
from Licensed Material

Stoichiometry



$$2000\text{kg UF}_6 \approx 450\text{kg HF}$$



Proposed Threshold of 2000kg of  $\text{UF}_6$



# The Proposed Rule Would:

- Incorporate an ISA Similar to Part 70
- Add Additional Criteria for Emergency Plan
- Incorporate a Backfit Provision
- Limit Licensing to only the NRC

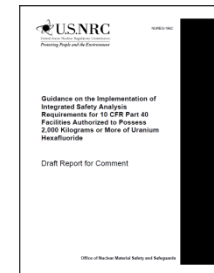
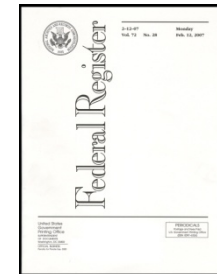
# Current Status



## Publication of Proposed Rule and Associated Guidance

Federal Register – May 2011

Comment Period Ends – Sep 9, 2011

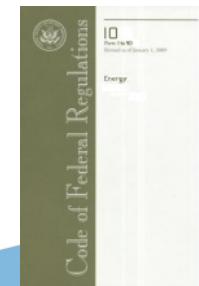


## Final Rule

Address Comments

Approved by Commission

Scheduled to Publish in Late 2012





# **NUREG-1962 Guidance on Part 40 Rulemaking to Incorporate ISA**

## **Tables in the Guidance**

**Matt Bartlett – NMSS**

# Purpose of the NUREG-1962



## Applicability of NUREG-1513

- "Integrated Safety Analysis Guidance Document."

## Applicability of NUREG-1520

- "Standard Review Plan for the Review of a License Application for Fuel Cycle Facility."

# Key Sections of the NUREG-1962



Table 1 Requirements Added to Part 40

Table 2 Crosswalk between Part 40, Part 70,  
and NUREG-1520

Table 3 Location of ISA Terms and  
Requirements in NUREG-1520, Revision 1

Table 4 Expanded Information Requirements  
for the ISA Summary

# Conclusion

References existing guidance in NUREG-1513  
and 1520

Discussion of difference between Part 40  
and Part 70

Provides crosswalks to parallel sections of  
Part 70

# **Public Comments**

## **Proposed Part 40 ISA Rulemaking and Guidance**