

August 16, 2012

MEMORANDUM TO: Joselito Calle, Chief
Fuel Facility Branch 2
Region II Office

THRU: Brian W. Smith, Chief **/RA/**
Uranium Enrichment Branch
Division of Fuel Cycle Safety
and Safeguards
Office of Nuclear Materials Safety
and Safeguards

FROM: Mike Raddatz, Sr. Project Manager **/RA/ B. Smith for**
Uranium Enrichment Branch
Division of Fuel Cycle Safety
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Office of Nuclear Materials Safety
and Safeguards

SUBJECT: RECOMMENDATIONS FOR THE TITLE 10 CODE OF FEDERAL
REGULATIONS, SECTION 70.72, SUMMARY OF CHANGES
FOR CALENDAR YEAR 2011 FACILITY INSPECTION FOR
LOUISIANA ENERGY SERVICES
(DOCKET NO. 70-3103)

The Uranium Enrichment Branch (UEB) has completed its review of Louisiana Energy Services changes to the records made without prior U.S. Nuclear Regulatory Commission approval, in accordance with Title 10 of the *Code of Federal Regulations*, Section 70.72(c) during calendar year 2011. Based on our review, we identified a list of recommended facility changes (Enclosure) for the inspection team to consider as part of the inspection planning for inspection procedure 88070.

If you have any question regarding these recommendations, please contact Mike Raddatz at (301) 492-3108, or via e-mail to Michael.Raddatz@nrc.gov.

Enclosure:
List of Recommendations

Docket No. 70-3103
License No. SNM-2010

CONTACT: Mike Raddatz, NMSS/FCSS/UEB
301-492-3108

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LIST OF RECOMMENDATIONS

Facility Changes for Inspection Consideration

Facility Change Package ID	Description	Fuel Cycle Safety and Safeguards Conclusion
2011-0296	<p>This Configuration Change (CC-EG-2011-0007) removes Accident Sequence PB1-3 from the Integrated Safety Analysis Summary and Safety Analysis Report and changes the applicability of items relied on for safety (IROFS) 45 to only apply to the Cylinder Receipt and Dispatch Building (CRDB) and not to the Blending and Liquid Sampling Area (BLSA) or the uranium hexafluoride (UF₆) Handling Area. (Note the BLSA was previously located in the CRDB, but is now contained in the UF₆ Handling Area). Previously IROFS45 included language that it applied to the BLSA and the CRDB. However, when the CRDB was redesigned the BLSA was relocated to within the UF₆ Handling Area in SBM-1001, and the accident described in Accident Sequence PB1-3 is not credible in the UF₆ Handling Area. There are no cranes inside the UF₆ Handling Area or other material handling equipment that could credibly enable the stacking of 30B product cylinders and cause a criticality.</p> <p>This CC also revises the definition and implementation of IROFS45 and revises Accident Sequence RDI-1, which applies to the CRDB. The intent of IROFS45 is to ensure that no more than one filled or heeled 30B product cylinder is stacked or suspended above an array of other filled or heeled 30B cylinders, thus preventing the possibility of a nuclear criticality.</p>	<p>In Section 5: "Disposition of 70.72(c) Evaluation" of EG-3-2100-01-F-1 "Configuration Change Form" Tim Harney checked the boxes labeled: "Change does require prior NRC approval," and "CC is not acceptable, cancel CC." He added the comment: "Management decision - No IROFS alteration." Section 6 has been crossed out, and indicates the change was cancelled and never implemented. However, it was provided to the U.S. Nuclear Regulatory Commission with the list of completed changes, for which prior NRC approval was not needed.</p>
2011-0440	<p>This configuration change (CC-EG-2008-126) involves the removal of accident sequence PB3-3 and associated IROFS3 and 47a. The licensee determined that the accident sequence falls into the category of "not credible" based on NUREG 1520 criteria: a process deviation that consists of a sequence of many human actions or errors for which there is no reason or motive. Therefore, the associated IROFS3 and 47a were determined to not be required to meet the Title10 of the Code of Federal Regulations, Section 70.61 performance requirements.</p>	<p>While the licensee's description of the accident sequence in this package appears on the surface to meet the definition of "not credible" in NUREG-1520, it was noted that the description credits several controls/alarms/etc. If these are removed from consideration, it is uncertain if the same conclusion would be arrived at. As noted in NUREG-1520, "the fact that an event is not credible must not depend on any facility feature that could credibly fail to function, or be rendered ineffective as a result of a change to the system." Valves, sensors, programmable logic controller controls, and alarms/response should fall into this category. It is unclear if the accident sequence meets the definition of not credible.</p>

Enclosure