

February 27, 2013

Mr. Steve Toelle
Director, Regulatory Affairs
United States Enrichment Corporation
6903 Rockledge Drive
Bethesda, MD 20817-1818

SUBJECT: REVISION OF THE UNITED STATES ENRICHMENT CORPORATION'S
TECHNICAL SAFETY REQUIREMENTS SECTION 3.0, MINIMUM STAFFING
REQUIREMENTS FOR THE PADUCAH GASEOUS DIFFUSION PLANT
(TAC NO. L32794)

Dear Mr. Toelle:

I am responding to your letter dated November 9, 2012 (GDP 12-0033), in which you requested the U.S. Nuclear Regulatory Commission's (NRC's) review and approval of a proposed amendment to the Certificate of Compliance for the Paducah Gaseous Diffusion Plant (PGDP). The request proposes to revise PGDP's Technical Safety Requirements Section 3.0, Administrative Requirements, Table 3.2.2-1, Minimum Staffing Requirements.

Our review of your submittal has identified additional information that is needed before final action can be taken. The additional information specified in the enclosure should be provided to the NRC within 30 days from the date of this letter. Please reference Technical Assignment Control number L32794 for this action in your response.

In accordance to Title 10 of the *Code of Federal Regulations* 2.390(d) of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records component of NRC's document system (Agency wide Documents Access and Management System [ADAMS]). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

If you have any questions regarding this matter, please contact Mr. Osiris Siurano-Perez at (301) 492-3117, or via e-mail at Osiris.Siurano-Perez@nrc.gov.

Sincerely,

/RA/ James Down For

Brian W. Smith, Chief
Uranium Enrichment Branch
Division of Fuel Cycle Safety
and Safeguards
Office of Nuclear Material Safety
and Safeguards

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

cc: Mr. Vernon Shanks, U.S. Enrichment Corporation

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Uranium Enrichment Branch
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Enclosure:
Request for Additional Information

cc: Mr. Vernon Shanks, U.S. Enrichment Corporation

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**REQUEST FOR ADDITIONAL INFORMATION REGARDING
THE UNITED STATES ENRICHMENT CORPORATION'S CERTIFICATE
AMENDMENT REQUEST TO REVISE TECHNICAL SAFETY REQUIREMENTS
SECTION 3.0 MINIMUM STAFFING REQUIREMENTS
DATED NOVEMBER 9, 2012
DOCKET: 70-7001**

Technical Safety Requirement 2.2.4.13

Please provide an explanation for how operability of the autoclave manual isolation system would be impacted in applicable modes if either Building C-337 or C-333 is not staffed as described in proposed footnote f of Technical Safety Requirement (TSR) Table 3.2.2-1 and the actuating devices are not accessible to the C-337a or C-333a operator in the event of a release.

Technical Safety Requirement 2.2.4.7

Please provide a detailed explanation of how the immediate actions of TSR 2.4.4.7 are implemented if the C-631-2 basin drops below the required level for operability, including who, from the proposed TSR minimum staff, is trained and qualified to perform the actions and from what specific location in the plant those actions are performed. Please also explain who from the proposed TSR minimum staff is trained and qualified to manually start fire water pumps, if necessary, and monitor system parameters (e.g., storage tank level) as described in the TSR 2.4.4.8 and 2.4.4.9 bases and from what specific location in the plant those actions are performed.

Technical Safety Requirement 2.4.4.12

Please provide a detailed explanation of how the actions of TSR 2.4.4.12 are implemented with regards to providing an alternate means of cell shutdown in the event that the cascade cell trip system is not operable, including who, from the proposed TSR minimum staff, is trained and qualified to perform the actions and from what specific location (e.g., switchyard) those actions are performed.

Impact of Staff Reduction on Emergency Response Capability

Please provide a specific basis for why your E-Squad's ability to respond to emergencies as described in your Emergency Plan is not negatively impacted by your proposed reduction in TSR minimum staffing.