

**REQUEST FOR ADDITIONAL INFORMATION
BABCOCK & WILCOX NUCLEAR OPERATIONS GROUP
PROPOSED QUANTITATIVE STANDARD FOR CONSEQUENCE
SUBMITTED JUNE 8, 2015**

**DOCKET NUMBER 70-27
LICENSE NUMBER SNM-42
TECHNICAL ASSIGNMENT CONTROL NUMBER L33377**

Request for Additional Information (RAI)

During a review of the proposed quantitative standard for determining the consequence of scenarios involving dermal and ocular exposures from the U.S. Nuclear Regulatory Commission (NRC)-regulated chemicals for compliance with Title 10 the *Code of Federal Regulation* (10 CFR) Paragraph 70.65(b)(7), the following additional information is needed before a determination can be made:

RAI 1: The description of the proposed standard states that Babcock & Wilcox Nuclear Operations Group, Inc. (B&W NOG) considers the hydrogen fluoride (HF) standard to bound acidic and corrosive chemicals.

NRC Request: Clarify what B&W NOG means by “bounding.” Will this same standard be applied to other NRC-regulated chemicals at the site?

Applicable Requirements: The regulations in 10 CFR 70.65(b)(7) require a description of the proposed quantitative standards used to assess the consequences to an individual from acute chemical exposure to licensed materials or chemicals produced from licensed materials. These are to be used to assess “high” and “intermediate” consequence events.

RAI 2: The description of the proposed standard states that B&W NOG considers the HF standard to bound acidic and corrosive chemicals and that “...HF is the only chemical utilized in NOG-Ls uranium processing which has been identified as potentially being ‘fatal in contact with skin’ and for that reason, NOG-L considers an ocular and dermal HF exposure to be bounding to other chemicals...”

NRC Request: Does this mean that there will be no “high consequence” or “intermediate consequence” exposures from other NRC-regulated chemicals, such as nitric acid?

Applicable Requirements: The regulations in 10 CFR 70.65(b)(7) require a description of the proposed quantitative standards used to assess the consequences to an individual from acute chemical exposure to licensed materials or chemicals produced from licensed materials. These are to be used to assess “high” and “intermediate” consequence events.

RAI 3: The discussion of the proposed standard states that B&W NOG will review process accident standards and any if items relied on for safety are identified they will be incorporated into the Integrated Safety Analysis (ISA).

Enclosure

NRC Request: Elaborate on how B&W NOG will use the standard once it is approved. Describe how will B&W NOG use this standard for the review of the existing ISA as well as ISA updates associated with new operations or facility modifications required by 10 CFR 70.72.

Applicable Requirements: The regulations in 10 CFR 70.62(c) require the ISA to be conducted and maintained. 10 CFR 70.72(c)(2) and 70.72(c)(3) require that changes to the site, structures, processes, systems, equipment, components, etc. be evaluated against the performance requirements. Consequence determination flows into that review.