

August 11, 2015

MEMORANDUM TO: Catherine Haney, Director  
Office of Nuclear Material Safety  
and Safeguards

FROM: Marissa G. Bailey, Director **/RA/**  
Division of Fuel Cycle Safety, Safeguards,  
and Environmental Review  
Office of Nuclear Material Safety  
and Safeguards

SUBJECT: CLOSURE STRATEGY FOR GENERIC LETTER 2015-01:  
"TREATMENT OF NATURAL PHENOMENA HAZARDS IN FUEL  
CYCLE FACILITIES"

This memorandum documents the closure strategy for Generic Letter (GL) 2015-01, "Treatment of Natural Phenomena Hazards in Fuel Cycle Facilities." The GL requests information from addressees licensed under Title 10 of the *Code of Federal Regulations* (10 CFR) Parts 40 and 70. Specifically the GL requests that licensees submit to the U.S. Nuclear Regulatory Commission (NRC) a written response providing information to demonstrate compliance with regulatory requirements and applicable license conditions regarding the treatment of natural phenomena events in the facilities' safety analyses. The staff will review the GL responses to determine if additional NRC regulatory action is necessary to ensure that licensees are in compliance with their current licensing basis and existing NRC regulations. The GL was issued June 22, 2015 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML14328A029), and licensees are required to respond within 90 days.

In accordance with NRC Management Directive 8.18, "Generic Communications Program," after licensee responses to the GL have been submitted to the NRC, the staff will perform the tasks listed below to complete the closeout of the GL for each licensee. The estimated schedule for completion of the tasks is included, as well as the lead organization responsible for each task.

1. Task: Review licensee responses to the GL:

- a. Task: Issue requests for supplemental information to licensees if issues are identified with the completeness of GL responses, or if the NRC staff has additional questions related to the technical content of the responses.

Estimated Completion: Within 90 days following receipt of licensee responses.

Lead Organization: NMSS/FCSE

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- b. Task: Conduct site visits, if necessary, to review documentation referenced by licensees in their GL responses.

Estimated Completion: Within 6 months following receipt of licensee responses.

Lead Organization: NMSS/FCSE

- c. Task: Determine the adequacy of the responses in addressing staff guidance in NUREG-1520, "Standard Review Plan for the Review of a License Application for a Fuel Cycle Facility," and Interim Staff Guidance FCSE-ISG-15, "Natural Phenomena Hazards in Fuel Cycle Facilities."

Estimated Completion: Within 12 months following receipt of licensee responses.

Lead Organization: NMSS/FCSE

- 2. Task: Develop and issue a Temporary Instruction (TI) for regional inspectors to use in assessing licensee implementation of the integrated safety analysis (ISA) methodology and assumptions described in licensee GL responses.

Estimated Completion: Within 30 days after initial evaluation of licensee responses.

Lead Organization: NMSS/FCSE

- 3. Task: Perform TI inspections to independently verify that licensees are in compliance with regulatory requirements and applicable license conditions and follow up with previously identified Unresolved Items (URIs) regarding the treatment of natural phenomena events in the facilities' ISAs. The staff will perform inspections on an as needed basis and will use the NRC's enforcement process to assess and disposition previously identified URIs and any new violations of NRC requirements. Inspection reports will be issued upon completion of TI implementation.

Estimated Completion: Within 12 months following receipt of licensee responses. The inspections may be delayed pending the completion of any associated plant modification.

Lead Organization: RII/DFFI

- 4. Task: Issue closure letters for the GL to (1) describe the results of the staff's review of licensee responses and (2) reference the outcome of inspections performed under Task 3, as applicable.

Estimated Completion: Within 12 months following receipt of licensee responses.

Lead Organization: NMSS/FCSE

NMSS/FCSE staff is responsible for the coordination of the efforts to ensure adequate closeout of GL 2015-01. The staff's goal for completion of the activities associated with GL 2015-01 is 12 months following receipt of licensee responses. However, the presence of ongoing enforcement activities at a facility may result in extension of this projected timeline.

Enclosure 1: Closure Strategy Flowchart

Enclosure 2: Gantt Chart

NMSS/FCSE staff is responsible for the coordination of the efforts to ensure adequate closeout of GL 2015-01. The staff's goal for completion of the activities associated with GL 2015-01 is 12 months following receipt of licensee responses. However, the presence of ongoing enforcement activities at a facility may result in extension of this projected timeline.

Enclosure 1: Closure Strategy Flowchart

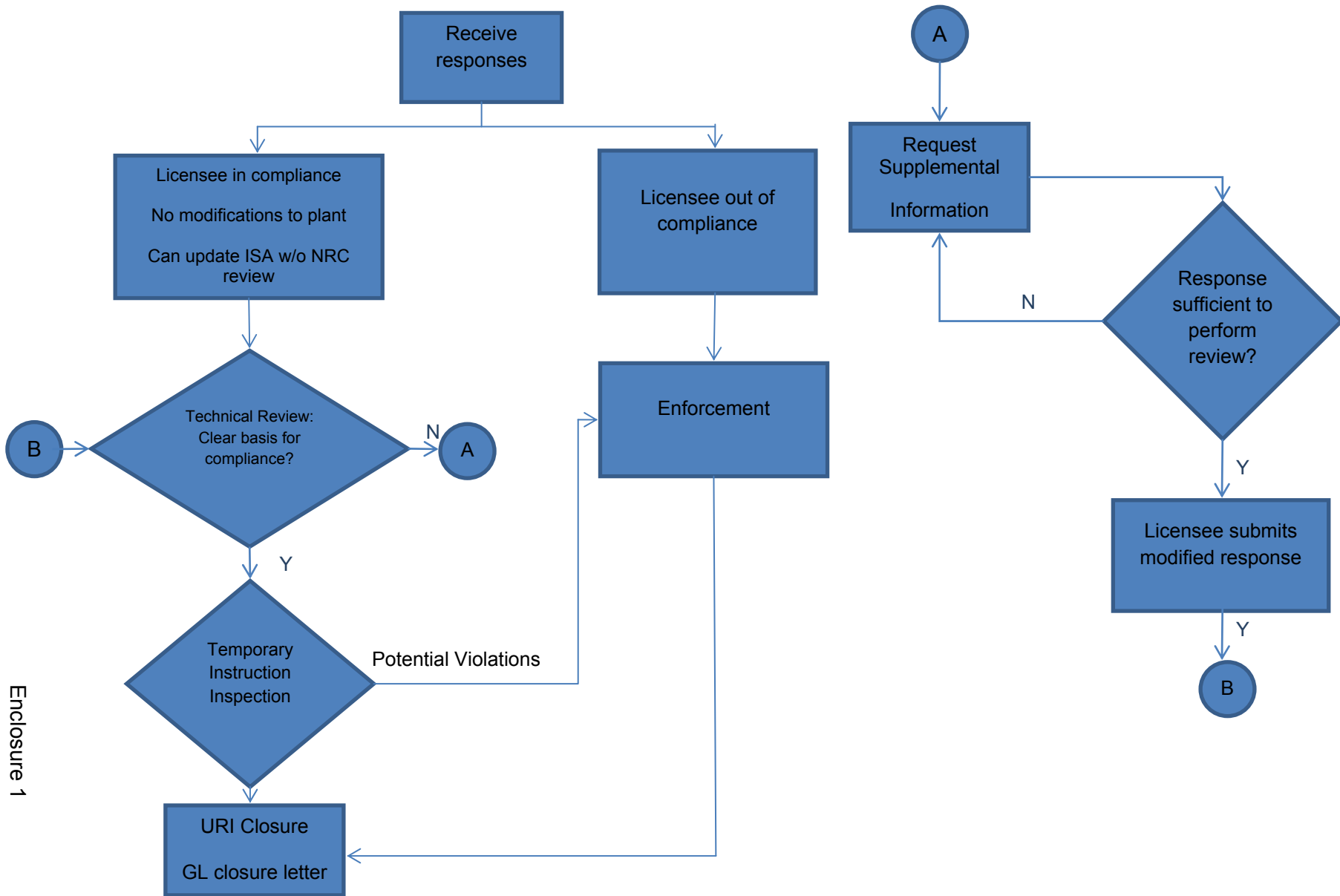
Enclosure 2: Gantt Chart

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OFFICE	FCSE/PORSB	FCSE/ECB	FCSE/PORSB	R-II/DRS/EB2	NMSS/FCSE
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DATE	7/13/2015	7/15/2015	8/03/2015	7/31/2015	8/11/2015

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			2015				2016									
<i>Task</i>	<i>Start</i>	<i>Lead</i>	Sept	Oct	Nov	Dec	Jan	Febr	Marc	April	May	June	July	Aug	Sept	<b>Comments</b>
<b>Task 1.a. Issue request for supplemental information</b>	09/21/2015	NMSS/FCSE			I											Licensee Responses to Generic Letter 2015-01 are due to the NRC September 21, 2015
<b>Task 1.b. Site Visits</b>	09/21/2015	NMSS/FCSE														Site Visits: As needed
<b>Task 1.c. Technical Review of responses</b>	09/21/2015	NMSS/FCSE														Completion of task within 12 months following receipt of responses
<b>Task 2. Temporary Instruction</b>	09/21/2015	NMSS/FCSE			I											Issuance: 30 days after initial review of license responses
<b>Task 3. Inspections</b>	11/01/2015	RII/DFFI														Within 12 months following issuance of the Temporary Instruction
<b>Task 4. Closure Letters</b>	11/01/2015	NMSS/FCSE														Completion of task within 12 months following receipt of responses
			<b>I = Marks a milestone with text</b>													