



Global Nuclear Fuel

A Joint Venture of GE, Toshiba, & Hitachi

Global Nuclear Fuel

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ACH 15-001

July 22, 2015

Director, Office of Nuclear Material Safety and Safeguards
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Attn: Document Control Desk

Subject: GNF-A Response to NRC Generic Letter 2015-01

References: 1) NRC License SNM-1097, Docket 70-1113
2) NRC Generic Letter 2015-01 "Treatment of Natural Phenomena Hazards (NPH) in Fuel Cycle Facilities"
3) NRC Inspection Report No. 070-1113/2012-006, 7/27/12

Dear Sir or Madam:

With respect to activities authorized by NRC License SNM-1097, the Global Nuclear Fuel-Americas, L.L.C. (GNF-A) facility in Wilmington, North Carolina hereby requests an alternative course of action to respond to NRC Generic Letter 2015-01 (Reference 2).

In order to respond the Generic Letter and close URI 70-1113/2012-006-01, GNF-A is currently conducting ongoing NPH analysis activities. GNF-A requests an extension to respond to the Generic Letter until January 29, 2016 in order to document the conclusions of these activities in our ISA, incorporate guidance from the newly issued FCSE-ISG-15 and update the ISA Summary. We agree with the conclusion in the Generic Letter that our facility is currently adequate to protect public health and safety. Therefore, this alternative course of action will not be detrimental to safety.

I declare under penalty of perjury that the foregoing is true and correct.

If you have any questions regarding this matter, please contact me at (910) 819-6145.

Executed on July 22, 2015

Adam Hilton,
GNF-A Facility Manager

Commitments: Complete requested actions and provide revised ISA Summary by January 29, 2016

Attachment: None

cc: NRC Region II Administrator, Atlanta, GA
Manuel Crespo, USNRC, RII
Ty Naquin, USNRC, NMSS