

August 26, 2015

Mr. Tony England  
Manager, Licensing & Safety Analysis  
BWXT NOG, Inc.  
P.O. Box 785  
Lynchburg, Virginia 24505-0785

SUBJECT: BWXT NUCLEAR OPERATIONS GROUP, INC. – PROPOSED STANDARD FOR  
DERMAL AND OCULAR EXPOSURES (TECHNICAL ASSIGNMENT CONTROL  
NUMBER L33377)

Dear Mr. England:

This refers to your letter 15-063, dated June 8, 2015, which submitted a proposed standard for dermal and ocular exposures to hydrogen fluoride solution, as well as your letter 15-087 dated July 27, 2015, which clarified the proposed ocular intermediate standard and provided responses to the U.S. Nuclear Regulatory Commission (NRC) staff's Request for Additional Information (RAI).

The NRC has completed its review of the proposed standard and RAI responses and concluded that the proposed standard is acceptable for inclusion in the Integrated Safety Analysis (ISA) Summary to meet the requirements of Title 10 of the *Code of Federal Regulations* (10 CFR) Paragraph 70.65(b)(7), which requires that the ISA summary contain "...a description of the proposed quantitative standards used to assess the consequences to an individual from acute chemical exposure to licensed material or chemicals produced from licensed materials...."

BWXT's response to RAI #3 states that "NOG-L will continue to fully consider all exposure pathways when performing process hazards analysis and evaluate any new applicable technical standards, as they become available, that have the potential to impact our safety evaluations of high or intermediate consequence events...." This provides assurance that BWXT will adequately evaluate the chemical hazards, new information, changes as it strives to provide adequate protection to workers as called for in the performance requirements of 10 CFR Section 70.61. This clarification eliminates the need for the staff to consider any non-routine examination of the site ISA summary. A Safety Evaluation Report (SER) which summarizes the staff review is enclosed.

Technical Assignment Control Number L33377 is CLOSED.

T. England

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In accordance with 10 CFR 2.390 of the NRC's "Agency Rules of Practice and Procedure," a copy of this letter and its enclosed SER will be available electronically for public inspection in the NRC Public Document Room, or from the Agencywide Documents Access and Management System.

If you have any questions, feel free to contact me at (301) 415-7119, or via e-mail to [Merritt.Baker@nrc.gov](mailto:Merritt.Baker@nrc.gov).

Sincerely,

**/RA/**

Merritt N. Baker, Senior Project Manager  
Fuel Manufacturing Branch  
Division of Fuel Cycle Safety, Safeguards,  
and Environmental Review  
Office of Nuclear Material Safety  
and Safeguards

Docket No. 70-27  
License No. SNM-42

Enclosure:  
Safety Evaluation Report

T. England

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If you have any questions, feel free to contact me at (301) 287-9109, or via e-mail to [Merritt.Baker@nrc.gov](mailto:Merritt.Baker@nrc.gov).

Sincerely,

**/RA/**

Merritt N. Baker, Senior Project Manager  
Fuel Manufacturing Branch  
Division of Fuel Cycle Safety, Safeguards,  
and Environmental Review  
Office of Nuclear Material Safety  
and Safeguards

Docket No. 70-27  
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Enclosure:  
Safety Evaluation Report

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