



Urenco USA Proposal – Smarter Fuel Cycle Inspection Program

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UUSA Corrective Action Program



- An effective Corrective Action Program is capable of identifying issues which exceeds a license basis minimum. UUSA has demonstrated that issues are identified completely, accurately, and in a timely manner.
- In accordance with our program, failures to meet license requirements are identified and evaluated to ensure that resolutions address causes and extent of conditions commensurate with their safety significance.
- Our facility takes effective corrective actions to address issues in a timely manner commensurate with their safety significance and the facility periodically analyzes information from the corrective action program and other assessments to identify programmatic and common cause issues.

Corrective Action Program as a Requirement



- An effective Corrective Action Program results in the need for the NRC to perform fewer inspections.
- Issues are identified, evaluated and corrected in a timely manner and are retrievable by the NRC for enforcement action, if necessary.
- If failures to meet license requirements are not required to be placed into a corrective action program, then NRC inspection may be warranted to help identify such failures.

- UUSA is proposing a program that has an option for a facility which commits to Corrective Action Program and receives accreditation through an NRC Inspection.

- UUSA's proposal is based upon the NRC's Option 2.
- Comprehensive Inspection activities to be performed triennially for
 - 1) Fire Protection,
 - 2) Radiation Protection,
 - 3) Effluent Control & Environmental,
 - 4) Transportation and
 - 5) Emergency Preparedness.
 - Further the proposal removes the annual Modifications Inspection in lieu of the triennial Modifications inspection.
- Additionally, a required Corrective Action Program Inspection is proposed triennially.
- It is proposed that the Corrective Action Program, Comprehensive and Plant Modifications inspections would each be performed in sequential years in lieu of the NRC proposed inspection regime

Proposed Revision to Proposal 2



		Category I Fuel Facility		Category III Fuel Fabrication Facility		Uranium Conversion Facility		Gas Centrifuge Facility	
Function/Program Areas	Procedure or Procedure Suite	Inspection Frequency	Estimated Resources per IP (hrs)	Inspection Frequency	Estimated Resources per IP (hrs)	Inspection Frequency	Estimated Resources per IP (hrs)	Inspection Frequency	Estimated Resources per IP (hrs)
SAFETY OPERATIONS									
Plant Operations	88020 (OPR)	Biennial	30	Annual	90	Annual	90	Annual	90
	88135 (Resident Inspection Program)	Annual	797	-	-	-	-	-	-
Criticality Safety	88015	Annual	180	Annual	90	-	-	Annual	90
Fire Protection **	8805X	Biennial	30	Biennial	60	Biennial	60	Biennial	60
SAFEGUARDS									
MC&A	Procedures as in IMC 2683	Annual	120	Biennial	60	-	-	Biennial	60
MC&A (observation)	Procedures as in IMC 2683	Triennial	30	Triennial	30				30
RADIOLOGICAL CONTROLS									
Radiation Protection **	88030 (RP)	Annual	30	Annual	30	Annual	30	Annual	30
Environmental Protection **	88045 (Effluent Control and Env.)	Annual	30	Annual	30	Annual	30	Annual	30
Transportation **	86740 (T)	Triennial	30	Triennial	30	Triennial	30	Triennial	30

**Unless Inspections are performed under an accredited CAP program

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FACILITY SUPPORT									
Emergency Preparedness **	88050 (EP)	Biennial	30	Biennial	30	Biennial	30	Biennial	30
	88051 (Exercise Observation)	Biennial	48	Biennial	48	Biennial	48	Biennial	48
Plant Modifications (Annual) **	88070	Annual unless 88072 is performed	30	Annual unless 88072 is performed	30	Annual unless 88072 is performed	30	Annual unless 88072 is performed	30
Plant Modifications (Triennial)	88072	Triennial	90	Triennial	90	Triennial	90	Triennial	90
ACCREDITED CORRECTIVE ACTION PROGRAM (IF LICENSEE HAS VOLUNTARILY IMPLEMENTED AN ACCREDITED CAP)									
Corrective Action Program	88161 (CAP)	Triennial	90	Triennial	90	Triennial	90	Triennial	90
Comprehensive	Fire Protection (8805X)	Triennial	45	Triennial	45	Triennial	45	Triennial	45
	88030 (RP)	Triennial	30	Triennial	30	Triennial	30	Triennial	30
	88045 (Effluent Control and Env.)	Triennial	30	Triennial	30	Triennial	30	Triennial	30
	86740 (Transportation)	Triennial	15	Triennial	15	Triennial	15	Triennial	15
	88050 (Emergency Prep)	Triennial	30	Triennial	30	Triennial	30	Triennial	30
	Plant Modifications (88070)	-	0	-	0	-	0	-	0

**Unless Inspections are performed under an accredited CAP program