



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**
WASHINGTON, D.C. 20555-0001

December 19, 2019

MEMORANDUM TO: Jacob I. Zimmerman, Chief
Fuel Facilities Licensing Branch
Division of Fuel Management
Office of Nuclear Material Safety
and Safeguards

FROM: Matthew A. Bartlett, Project Manager */RA/*
Fuel Facilities Licensing Branch
Division of Fuel Management
Office of Nuclear Material Safety
and Safeguards

SUBJECT: DECEMBER 03, 2019, TELEPHONE CALL SUMMARY: DISCUSS
GLOBAL NUCLEAR FUELS - AMERICA, LLC. REQUEST TO
INCREASE ENRICHMENT TO 8 PERCENT

On December 3, 2019, the staff from the U.S. Nuclear Regulatory Commission (NRC) held a closed call with staff from Global Nuclear Fuels - America, LLC (GNF-A). The call addressed GNF-A's request to process special nuclear material (SNM) enriched up to 8 percent submitted via letter dated October 31, 2019, GNF-A-M190173, "GNF-A License Amendment Request," (Agencywide Documents Access and Management System [ADAMS] Accession No. ML1930B898). In the amendment request, GNF-A provided administrative and criticality updates to Chapter 1 and 5 of the license applications.

During the call, the NRC staff asked GNF-A's strategy for updating the Integrated Safety Analysis (ISA) and noted that the application was silent on ISA. GNF-A stated that the amendment has no impact on the ISA methodology and therefore ISA was not included in the submittal. GNF-A also stated that the amendment request is seeking approval to revise its criticality analyses to support 8 percent enrichment and confirmed that there are no finalized criticality safety analyses available for review. GNF-A further clarified that it has not performed any evaluations under Title 10 of the *Code of Federal Regulations* 70.72 (10 CFR), "Facility changes and change process." Therefore, it did not provide analyses as part of the amendment request to justify physical changes to the facility or revisions to the safety basis in the ISA. The GNF-A staff stated they plan to use their existing change process under 10 CFR 70.72 to update their systems to support processing of 8 percent enrichment, once they obtain NRC approval of the criticality methodology. GNF-A believes that most of the facility changes to support the 8 percent enriched material (plant modifications, ISA updates, modification to IROFS, etc.) could be done without NRC preapproval because they would not decrease the effectiveness of existing safety systems or otherwise require a license amendment per 10 CFR 70.72.

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The NRC staff stated that the application needs to describe GNF-A's plans for implementing plant changes to support 8 percent enrichment and related changes to the ISA and ISA Summary. The GNF-A recognizes they will have to fully implement modifications to all impacted systems and safety programs using the 10 CFR 70.72 change process before they can process SNM enriched above 5 percent. The GNF-A staff understands that if they identify changes that require NRC pre-approval, they would submit a separate amendment request.

The NRC staff plan to provide a request for supplemental information for GNF-A to describe their strategy for processing plant modifications and updating the ISA. The GNF-A licensing manager expressed concern that the holidays would delay the response beyond the standard 30 days. The NRC staff committed to work with GNF-A to produce a workable schedule within the 60 day metric for acceptance.

The GNF-A staff expressed appreciation for the call and recommended routine communication as the review progresses. They also expressed a willingness to support a site visit to facilitate the review, which the NRC also supports.

ATTENDEES

GNF-A Staff:

Multiple GNF-A staff including:
Scott Murray – Licensing Manager

NRC Staff:

April Smith, Division of Fuel Management (DFM);
Jeremy Munson, DFM; and
Matt Bartlett, DFM.

Docket No. 07001113
License No. SNM-1019

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DATED: December 19, 2019

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ADAMS Accession No.: ML19346F570

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