

framatome

January 16, 2020
TJT:20:002

ATTN: Document Control Desk
Director, Office of Nuclear Material Safety and Safeguards
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Gentlemen:

**Subject: Submittal of Revised Chapter 2 of Framatome Inc.'s (Framatome's)
Richland, Washington Fuel Fabrication Facility; License No. SNM-1227;
Docket No. 70-1257.**

Enclosed with this letter is a revised Chapter 2 of SNM-1227. This change was made on October 10th 2019, to provide a process to provide on-the-job- training for an individual as the Radiation Protection Function Manager until such time as the individual meets the minimum NRC License requirements for the position. This process requires the formal designation of a mentor by the EHS&L manager. This individual is someone who previously held the position.

SNM-1227 section 1.2.4.11 authorizes Framatome to make this type of minor change without prior NRC approval provided a copy of the change is provided to the Director, Office of Nuclear Material Safety and Safeguards, with a copy to the appropriate NRC Regional Office, within six months after the change is made. This letter with the accompanying attachment fulfills this requirement.

If you have any questions regarding this licensing action, please contact Calvin Manning, of my staff at 509-375-8237 or via email at calvin.manning@framatome.com.

Additionally, I can be reached at 509-375-8550 or via email at timothy.tate@framatome.com.

Very truly yours,



T. J. Tate, Manager
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NM5520

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EHS&L Document
SNM-1227 - Chapter 2
Organization and Administration

Nature of Changes

Item	Paragraph	Description	Justification
1.	Section 2.2.5.2	Added individual in training allowances with a designated mentor who meets the required qualification to assist the individual in training when needed.	Increases management flexibility while maintaining the same level of proficiency associated with the indicated position.
2.			
3.			
4.			
5.			
6.			
7.			
8.			
9.			
10.			
List Below any Documents, including Forms & Operator Aids which must be issued concurrently with this document revision:			

This document contains a total of 10 pages excluding the signature page.

DOCUMENT REVIEW/APPROVAL/DELETION CHECKLIST

All new and/or revised procedures shall be approved by the change author, cognizant manager(s) of areas affected by the changes, and by applicable manager(s) of any function that approved the previous revision of the document unless responsibility for such approval has been transferred to another organization. Also, the procedure shall be approved by manager(s) of functional organizations that provide technical reviews. Finally, Document Control shall verify that the required approvals have been properly obtained and that any documents that must be issued concurrently are ready to be issued.

Document Reviews			Document Approvals	
Purpose/Function of Review	Specify Reviewer(s) (Optional except for change author)	(Check all that apply)	Title of Approver	(Check all that Apply)
Document Control (Automatic)		<input checked="" type="checkbox"/>	Document Control (Automatic)	<input checked="" type="checkbox"/>
Change Author	CD Manning	<input checked="" type="checkbox"/>	Author	<input checked="" type="checkbox"/>
Independent Technical Review	TJ Tate	<input checked="" type="checkbox"/>		
Operability Review(s)			Mgr, Richland Operations ⁽¹⁾	<input type="checkbox"/>
Conversion		<input type="checkbox"/>	Mgr, Uranium Conversion & Recovery Operations ⁽¹⁾	<input type="checkbox"/>
Recovery		<input type="checkbox"/>	Mgr, Ceramic Operations ⁽¹⁾	<input type="checkbox"/>
Ceramics		<input type="checkbox"/>	Mgr, Rods & Bundles ⁽¹⁾	<input type="checkbox"/>
Rods		<input type="checkbox"/>	Mgr, Component Fabrication ⁽¹⁾	<input type="checkbox"/>
Bundles		<input type="checkbox"/>	Mgr, Production Support ⁽¹⁾	<input type="checkbox"/>
Components		<input type="checkbox"/>	Mgr, Maintenance	<input type="checkbox"/>
Lab Review		<input type="checkbox"/>	Mgr, Ops Strategy & Supply Chain	<input type="checkbox"/>
Maintenance Review		<input type="checkbox"/>	Mgr, EHS&L ⁽²⁾	<input checked="" type="checkbox"/>
Transportation		<input type="checkbox"/>	Mgr, Nuclear Safety	<input type="checkbox"/>
EHS&L Review(s)			Mgr, Safety	<input type="checkbox"/>
Criticality	WL Doane	<input checked="" type="checkbox"/>	Mgr, Security & Emergency Preparedness	<input type="checkbox"/>
Radiation Protection		<input type="checkbox"/>	Mgr, Licensing & Compliance	<input type="checkbox"/>
Safety		<input type="checkbox"/>	Mgr, Mechanics Richland	<input type="checkbox"/>
Security/Emergency Prep.		<input type="checkbox"/>	Mgr, Plant Engineering & TS&M	<input type="checkbox"/>
Fire Safety		<input type="checkbox"/>	Mgr, Richland Site Quality	<input type="checkbox"/>
MC&A		<input type="checkbox"/>	Mgr. Purchasing	<input type="checkbox"/>
Transportation		<input type="checkbox"/>	Mgr, PP&CPC	<input type="checkbox"/>
Environmental		<input type="checkbox"/>	Mgr, Richland Site/Other	<input type="checkbox"/>
Mechanics Richland Review		<input type="checkbox"/>	Richland Records Management	<input type="checkbox"/>
Mechanics Lynchburg Review		<input type="checkbox"/>	Training & Employee Dev.	<input type="checkbox"/>
Plant Engineering Review		<input type="checkbox"/>		
Quality Review		<input type="checkbox"/>		
Purchasing Review		<input type="checkbox"/>		
PP&CPC Review		<input type="checkbox"/>		
Others:		<input type="checkbox"/>		
Document Control		<input type="checkbox"/>		
Training & Employee Dev.		<input type="checkbox"/>		

⁽¹⁾Note: If approvals include 2 or more product center managers, the Operations manager can be substituted for the applicable product center managers.

⁽²⁾Note: The EHS&L manager can be substituted for the applicable EHS&L functional managers.

23371 (Rev. 001, 01/09/2018)

EHS&L CHANGE IMPACT EVALUATION FORM							
<p>The scope and content of this document have been determined by EHS&L to not impact the safety disciplines checked below. Future revisions do not require review by those EHS&L component(s) unless the scope changes such that a previously excluded safety discipline may be impacted.</p> <p> <input type="checkbox"/> Criticality <input type="checkbox"/> Radiation Protection <input type="checkbox"/> Safety/Security <input type="checkbox"/> Emergency Preparedness <input type="checkbox"/> MC&A <input type="checkbox"/> Transportation <input type="checkbox"/> Environmental </p>							
DOCUMENT VERSION:	EHS&L REVIEW COMPONENT:	EVALUATION DATE:	CHANGE EVALUATOR*:				
			2 ND PARTY APPROVAL*:				
<p>The scope and content of this document have been determined by EHS&L to not directly impact the safe handling of licensed materials (enriched uranium). Future revisions to this document do not require the 10CFR 70.72 change evaluation unless the scope of the document changes such that it directly impacts the handling of licensed materials.</p>							<input type="checkbox"/>
DOCUMENT / ECN No**:		EVALUATION DATE:		CHANGE EVALUATOR:			
E10-08-002		10/11/19		CD Manning			
Does the change potentially impact Criticality Alarm System (CAS) coverage?							<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
EVALUATION OF NRC PRE-APPROVAL:							
IS NRC PRE-APPROVAL (LICENSE AMENDMENT) NEEDED? > Based on "YES" answer to any of five questions below. > Based on "NO" answer to all five questions below.							<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
1. Does the change create new types of accident sequences that, unless mitigated or prevented, would exceed the performance requirements of 10 CFR 70.61 (create high or intermediate consequence events) and that have not previously been described in Framatome's ISA Summary?							<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. Does the change use new processes, technologies, or control systems for which Framatome has no prior experience?							<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
3. Does the change remove, without at least an equivalent replacement of the safety function an item relied on for safety (IROFS) that is listed in the ISA Summary?							<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
4. Does the change alter any item relied on for safety, listed in the ISA Summary, that is the sole item preventing or mitigating an accident sequence of high or intermediate consequences?							<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
5. Does the change qualify as a change specifically prohibited by NRC regulation, order or license condition?							<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
Evaluation of Actions Required PRIOR TO OR CONCURRENT with Change Implementation:							
6. Modification / Addition to CAS system or system coverage documentation							<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
7. Acquire NRC pre-approval (LICENSE AMENDMENT)							<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
8. Conduct/modify ISA							<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
9. Modify / update the following:	<input checked="" type="checkbox"/> None <input type="checkbox"/> Other	<input type="checkbox"/> ISA Database <input type="checkbox"/> Red-Line Drawings/P&ID	<input type="checkbox"/> NCSA <input type="checkbox"/> NCSS	<input type="checkbox"/> NCSP <input type="checkbox"/> PHA	<input type="checkbox"/> RHA <input type="checkbox"/> FHA	<input type="checkbox"/> ChHA <input type="checkbox"/> Procedures	
Evaluation of Actions Required SUBSEQUENT TO Change Implementation:							
10. Modify / update the following:	<input checked="" type="checkbox"/> None <input type="checkbox"/> Other	<input type="checkbox"/> ISA Database <input type="checkbox"/> AS-Built Drawings/P&ID	<input type="checkbox"/> NCSA <input type="checkbox"/> NCSS	<input type="checkbox"/> NCSP <input type="checkbox"/> PHA	<input type="checkbox"/> RHA <input type="checkbox"/> FHA	<input type="checkbox"/> ChHA <input type="checkbox"/> Procedures	
Justification Section for "YES" preceding Questions 1 – 8 or other for 9, 10:							

(*) Only required if one or more of the boxes to exclude a particular safety discipline review is checked.

(**) If this form exists as a part of a document, the document number is not required.

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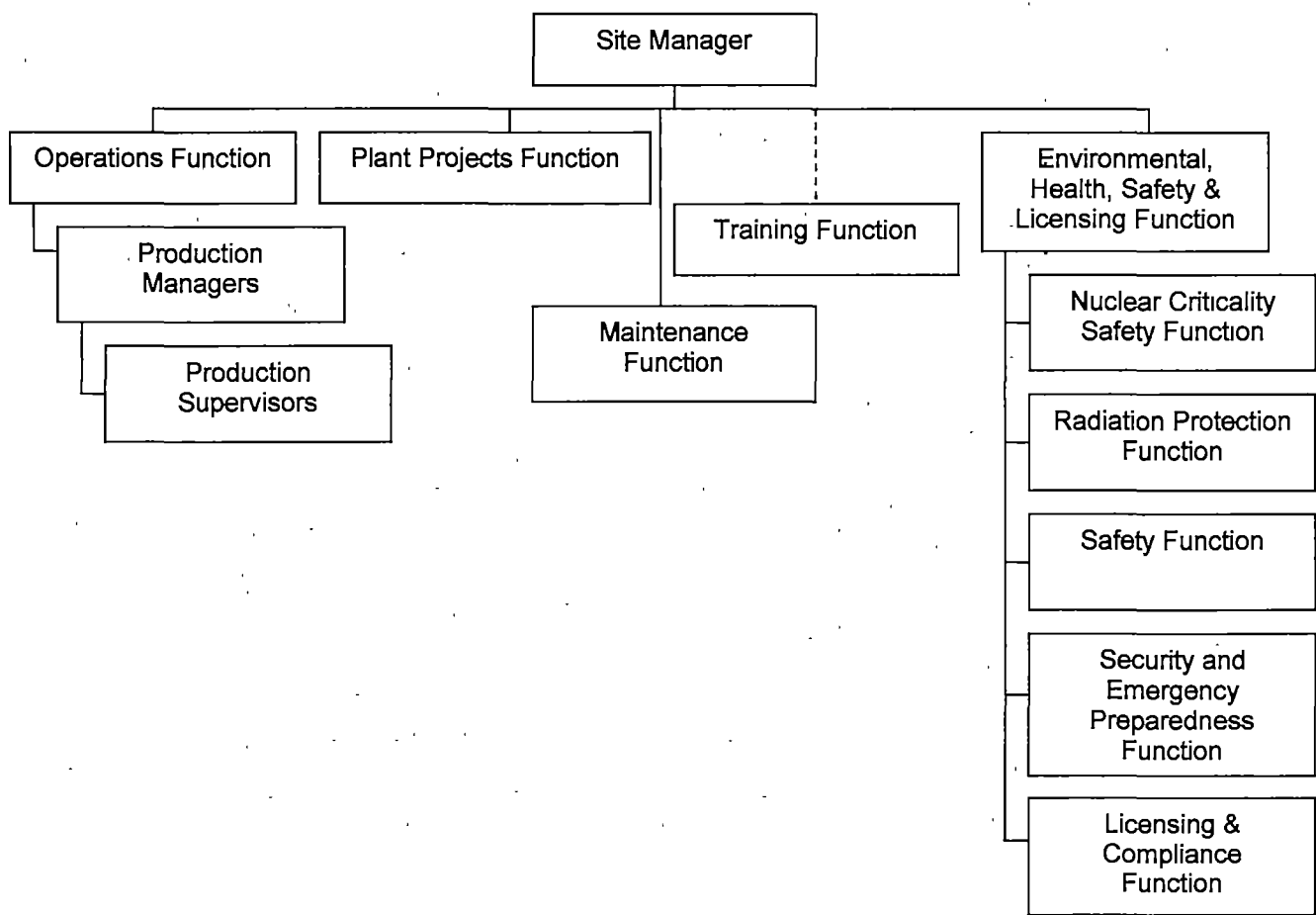
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2.0 Organization and Administration

2.1 Site Organization

The Richland Site Manager has the ultimate responsibility for ensuring that Richland site operations utilizing special nuclear material (SNM) are conducted in a manner that is protective of its workers, the public, and the surrounding environment, and remain in compliance with applicable Federal, State, and local regulations, licenses, and permits. This is accomplished by putting in place an on-site organization with defined accountabilities and assuring that the organization is given the authority and resources to meet its objectives. The primary components of that organization relevant to plant safety, their accountabilities and the key administrative measures utilized to assure safe plant operations are described below. The organization is depicted on a functional basis in Figure 2.1.

Figure 2.1 Site Management Functional Organization



2.2 *Organizational Responsibilities and Authority*

2.2.1 Site Manager

The Site Manager has the overall responsibility for the nuclear fuel manufacturing activities on the Richland site. This includes responsibility for production activities, as well as the responsibility for assuring that those activities are conducted in a manner that is protective of workers, the public, and the environment. These responsibilities shall be discharged by:

- The designation of defined responsibilities to qualified personnel.
- The establishment of mechanisms for the review of program effectiveness.

The Site Manager shall have a bachelors and/or advanced degree in science or engineering, a minimum of two years' experience in the nuclear industry, and at least five years' experience in management. Alternative combinations of education and experience may be acceptable consistent with guidance in American National Standard ANSI/ANS-3.1 (current revision).

2.2.2 Operations Function

The Operations function includes overall responsibility for fuel manufacturing activities and, as such, for operations involving the receipt, processing, storage, and shipment of SNM. Inherent in that responsibility is assurance that the operations are conducted safely and in compliance with license conditions. Control shall be established by:

- The designation of defined responsibilities to qualified personnel.
- The assurance that operating personnel are provided adequate work instructions and have been properly trained.
- The prompt correction of non-conforming conditions.

The individual responsible for the operations function shall have a bachelors and/or advanced degree in science or engineering, a minimum of two years' experience in the nuclear industry, and at least five years' experience in management, or a combination of education and experience judged appropriate by the Site Manager.

2.2.3 Production Managers

Production managers have responsibility for nuclear fuel manufacturing activities involving SNM. Those activities entail the safe use and control of SNM from initial receipt, through stages of processing, to ultimate shipment of product or process-related wastes. This authority, with regard to direct production activities, is conducted via a network of production supervisors overseeing trained workers who proceed in accordance with formal operating procedures.

Each production manager shall have a bachelors and/or advanced degree in science or engineering and at least two years' experience in the nuclear industry, or a combination of education and experience judged appropriate by the individual responsible for the operations function.

2.2.4 Production Supervisors

Production supervisors are directly responsible for the control of materials, personnel, equipment and activities in specific areas. These responsibilities include assuring that formal approved procedures are available and adhered to by operators and other applicable personnel.

Minimum qualifications for production supervisors shall include a high school education and two years' experience in the nuclear industry. Experience shall include practical application of criticality control and radiological safety techniques, and familiarity with specific applicable limitations imposed on production operations.

2.2.5 Environmental, Health, Safety and Licensing (EHS&L) Function

The EHS&L function has overall responsibility for the development and implementation of programs addressing worker health and safety; environmental protection; and licensing/permitting, including monitoring compliance with those licenses and permits. Technical EHS&L areas addressed within this overall function include nuclear criticality safety; radiation protection; environmental protection; integrated safety analysis; nuclear materials safeguards; industrial hygiene and safety; emergency preparedness; fire protection; and security. This function's responsibility with respect to manufacturing operations is only to confirm the safety of those operations, but it has authority to order shutdown and approve re-start of operations that are judged to be unsafe for continued operation or non-compliant with applicable regulatory requirements.

The individual responsible for the EHS&L function shall have a bachelors and/or advanced degree in science or engineering, with at least five years of experience that would develop an understanding of the health, safety, and environmental aspects of SNM processing activities.

2.2.5.1 Nuclear Criticality Safety Function

The nuclear criticality safety function has responsibility for the development and implementation of a comprehensive nuclear criticality safety program, as defined in Chapter 5.0, "Nuclear Criticality Safety." Key responsibilities include the performance of nuclear criticality evaluations of applicable SNM operations and changes to those operations; establishing limits and controls based on those evaluations; assuring the proper incorporation of limits and controls into applicable work instructions; and monitoring plant compliance with the criticality safety requirements.

The individual responsible for the nuclear criticality safety function shall have a bachelors and/or advanced degree in science or engineering, with at least three years' experience in nuclear criticality safety analysis. The criticality analysts working in the nuclear criticality safety function shall have a degree in science or engineering and are subject to successfully completing a formal internal training and qualification program.

2.2.5.2 Radiation Protection Function

The radiation protection function has responsibility for the development and implementation of a comprehensive program to limit radiological personnel exposures and environmental impacts associated with manufacturing and manufacturing-support activities. This includes the plant ALARA program. The radiation protection function includes a functional manager responsible for program implementation and staff management. Responsibility for program development, program evaluation, and certain other program sectors, e.g., the ALARA program or the bioassay program, may be assigned to other professional staff within the radiation protection function. If these staff report directly to the manager of the EHS&L function, they must meet the same minimum educational and experience requirements as the function manager (see below).

The radiation protection function also includes the Health and Safety Technicians (HSTs) who perform the day-to-day radiological surveillance activities required in the plant, e.g. workplace air sampling, effluent sampling, and contamination surveys. The HSTs may report to the manager of the radiation protection function via an intervening supervisor or to another manager in the EHS&L Function.

The individual(s) responsible for the radiation protection function shall have a bachelors and/or advanced degree in science or engineering, with at least three years' experience in radiation protection programs. Applicable work experience providing an understanding of radiation protection principles and programs may be substituted for the post-secondary educational requirements on the basis of two years' experience per one year of academic study. Assignment of an individual with no post-secondary education will require a minimum of ten years of applicable work experience. A Radiation Protection Function Manager in training that does not meet these minimum requirements has an individual, formally designated by the EHS&L Manager, to provide advice and consultation, until the minimum requirements are met. This individual is someone who previously held the position.

The HSTs shall have a high school diploma or GED equivalent and are subject to successfully completing a formal internal training and qualification program. The HST supervisor shall meet the qualification requirements for an HST and shall have worked as an HST for at least two years or acquired at least two years of other applicable work experience prior to assuming supervisory duties.

2.2.5.3 Safety Function

The safety function has responsibility for industrial safety/hygiene and fire protection.

The individual(s) responsible for the safety function shall have a bachelors and/or advanced degree in a technical field, with at least two years' experience in one or more of the safety disciplines included in this function. Applicable work experience providing an understanding of one or more of the pertinent safety disciplines may be substituted for the post-secondary educational requirements on the basis of two years' experience per one year of academic study. Assignment of an individual with no post-secondary education will require a minimum of ten years of applicable work experience.

2.2.5.4 Security and Emergency Preparedness Function

The security and emergency preparedness function has responsibility for the site physical protection and emergency management programs. The physical protection program is as outlined in the site Physical Protection Plan (see License Condition 1.2.5.9). The emergency management program is as set forth in Chapter 8.0, Emergency Management.

The individual responsible for the security and emergency preparedness function shall have a bachelors and/or advanced college degree with two years' experience in at least one of the program areas included in this function. Applicable work experience providing an understanding of one or both of the pertinent program areas may be substituted for the post-secondary educational requirements on the basis of two years' experience per one year of academic study.

2.2.5.5 Licensing and Compliance Function

The licensing and compliance function has overall responsibility for acquiring and maintaining

environmental, health, and safety-related licenses and permits as required to operate the Richland facility. In this regard, the licensing and compliance function has broad responsibility for interface with regulatory agencies relative to manufacturing-related activities. In addition to this role, this function has technical responsibility for the plant nuclear material accountability and environmental programs. Responsibility relative to radiological environmental programs is shared with the Radiation Protection function.

The individual responsible for the licensing and compliance function shall have a bachelors and/or advanced degree in a technical field, with at least two years' experience in the nuclear or general environmental, safety and health field, or a combination of education and experience judged appropriate by the manager of the EHS&L function.

2.2.6 Plant Projects Function

The plant projects function provides engineering services and support for the facilities, equipment, and peripheral support systems involved in product manufacturing, process development, and research and development. This involves support for existing equipment and systems, as well as engineering services for modifications and/or additions to plant equipment and facilities. This includes ownership of the plant's configuration management system for equipment, facilities, and systems.

The individual responsible for the plant projects function shall have a bachelors and/or advanced degree in engineering and at least two years' experience in the nuclear industry, or a combination of education and experience judged appropriate by the Site Manager.

2.2.7 Maintenance Function

The maintenance function provides maintenance support for the facilities and equipment involved in the use of licensed materials. This includes activities to assure that Items Relied on For Safety (IROFS) are available and reliable when needed. The individual responsible for the maintenance function shall have a bachelors and/or advanced degree in science or engineering with at least two years' experience in the nuclear industry, or a combination of education and experience judged appropriate by the Site Manager.

2.2.8 Training Function

The training function is responsible for the development, implementation, and administration of plant training programs, including maintenance of the plant training database. The training programs provided and/or coordinated by the training function address qualification of workers to perform work activities involving SNM (work station training) as well as required safety training.

The individual responsible for the training function shall have a bachelors and/or advanced degree and at least two years' experience in technical training or adult education, or a combination of education and experience judged appropriate by the Site Manager.

2.3 Administration

2.3.1 Management Measures

Framatome has established management measures to ensure that engineered and administrative controls and control systems that are identified as items relied on for safety pursuant to 10 CFR 70.61 (e) are designed, implemented, and maintained to ensure they are

available and reliable to perform their function as needed to comply with the performance requirements of 10 CFR 70.61. Those management measures include: 1) configuration management, 2) maintenance, 3) training and qualification, 4) procedures development and implementation, 5) audits and assessments, 6) incident investigation and corrective action, 7) records management, and 8) quality assurance for IROFS.

Framatome's programs for provision of these management measures are detailed in Chapter 11, "Management Measures."

2.3.2 Reporting of Unsafe Conditions or Activities

Framatome provides to employees a uniform mechanism for the reporting of unsafe conditions or activities to the EHS&L function via the FA Corrective Action Program. The concern is captured via a Condition Report (CR) and entered/managed as an EHS&L Condition. The CR is processed through a screening team with EHS&L representation. The team assigns an issue owner and an importance level that, in turn, defines follow-up investigation/evaluation requirements. Corrective actions are assigned and tracked to completion via the Corrective Action Program.

The reporting of unsafe conditions with immediate emergency implications is addressed in the site emergency plan described in Chapter 8, "Emergency Management."

2.3.3 Off-Site Emergency Response Resources

Framatome maintains written agreements with appropriate off-site organizations for the provision of emergency fire, police, ambulance/rescue, and medical services. These agreements are also addressed in Chapter 7, "Fire Safety," and Chapter 8, "Emergency Management."