

September 11, 1996

Mr. L. J. Maas  
Manager, Regulatory Compliance  
Siemens Power Corporation  
P.O. Box 130  
Richland, WA 99352-0130

SUBJECT: SNM-1227 LICENSE SECTION 3.2.3

Dear Mr. Maas:

Section 3.2.3 of your present license and your renewal license states:

SPC may elect to adjust DAC based upon model changes recognized by national and international radiation protection experts. Examples of such model changes specifically include changes in weighting factors for various organs and in revisions in the ICRP lung model.

This authorization to adjust derived air concentrations (DAC) based upon model changes was part of Amendment 26 of your license dated June 14, 1994. It was an oversight that approval was granted to Siemens Power Corporation to permit adjusting DAC based upon model changes.

Presently, we are not aware of any other NRC licensee who is authorized to adjust DAC based upon model changes by national and international radiation protection experts. All NRC licensees are required to use the DAC values in Table 1 of Appendix B of CFR Part 20 which are based upon ICRP-26 and ICRP-30. Using models that are not based on this model could result in internal exposures that are different for the same intake.

You are requested to revise the renewal application to remove the authorization to adjust DAC based upon model changes. This renewal application revision should be submitted as soon as possible, as we are in the final process of completing the renewal of your license.

If you think NRC should allow licensees to use different models, we recommend that you file a petition for rulemaking in accordance with 10 CFR 2.802.

If you have any questions, please contact me at 301-415-7190.

Sincerely,

Original signed by: MTokar for  
Robert Pierson, Chief  
Licensing Branch  
Division of Fuel Cycle Safety  
and Safeguards, NMSS

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Docket 70-1257  
License SNM-1227

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UNITED STATES  
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

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Sincerely,

A handwritten signature in cursive script, appearing to read "Michael T. Pierson", is written over the typed name.

Robert Pierson, Chief  
Licensing Branch  
Division of Fuel Cycle Safety  
and Safeguards, NMSS

Docket 70-1257  
License SNM-1227