



CONTAINS 10 CFR 2.790 INFORMATION

December 18, 1996

Mr. Robert C. Pierson
Chief, Special Projects Branch
Division of Fuel Cycle Safety
and Safeguards, NMSS
United States Nuclear Regulatory Commission
Washington, D.C. 20555-0001

SERIAL: GDP 96-0194

Paducah Gaseous Diffusion Plant (PGDP)
Portsmouth Gaseous Diffusion Plant (PORTS)
Docket Nos. 70-7001 and 70-7002
Quarterly Compliance Plan Report

Dear Mr. Pierson:

In the *Introduction* section of the PGDP and PORTS Compliance Plans, USEC committed to provide the NRC with quarterly reports on the implementation status of the Compliance Plans. Accordingly, enclosed is the initial quarterly Compliance Plan Report. This initial report is required to be submitted within ninety days of the Office of Nuclear Material Safety and Safeguards (NMSS) Director's decision on initial certification. For purposes of reporting consistency, USEC has established a cutoff date of November 30, 1996, for this report. The cutoff date for the next Compliance Plan Report will be February 28, 1997, and the report will be submitted to NRC by mid-March 1997. This pattern will be used for future quarterly Compliance Plan Reports.

As required by the Compliance Plan, enclosed is the following information: 1) an executive summary that identifies Compliance Plan issues that were completed during the past quarter, Compliance Plan issues that are scheduled to be completed during the next quarter, and a discussion of any Compliance Plan issues that are behind schedule; and 2) a detailed listing, sorted by noncompliance, of the individual commitments within each Compliance Plan issue.

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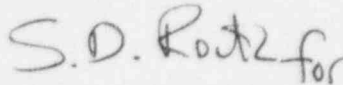
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Mr. Robert C. Pierson
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As you are aware, DOE has conducted inspections at both sites to review those Compliance Plan issues and actions that USEC considers complete. DOE has informed us that they will be submitting to us a letter documenting the results of their inspection, which we plan to reflect in the next quarterly report. If you have any questions or require additional information, please contact Russ Wells at (301) 564-3245. There are no new commitments contained in this submittal.

Sincerely,



Robert L. Woolley
Nuclear Regulatory Assurance and Policy Manager

Enclosure

cc: NRC Region III Office
NRC Resident Inspector - PGDP and PORTS
DOE Regulatory Oversight Manager

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1. Description of Compliance Plan Issues and Actions

EXECUTIVE SUMMARY

I. Introduction

On September 15, 1995, USEC initially submitted the Compliance Plans for PGDP and PORTS to NRC as part of the Certification Application. Subsequent revisions to the Compliance Plans were submitted to NRC on November 7, 1995 (Revision 1), February 5, 1996 (Revision 2), July 12, 1996 (Revision 3), and August 1, 1996 (Revision 3, Change A). The Compliance Plans include the following information:

- A description of the areas of noncompliance;
- A plan of actions and schedule for achieving compliance; and
- A justification for continued operation with adequate safety and safeguards.

The Compliance Plans contains 106 individual areas of noncompliances or "issues," 57 at PGDP and 49 at PORTS. Each issue includes one or more actions that must be completed in the next several years. There are approximately 450 individual actions contained in the Compliance Plans. Figure 1 shows graphically the Compliance Plan actions that have been completed and those actions that are remaining to be completed.

The *Introduction* sections of the Compliance Plans state:

"Subsequent to the Office of Nuclear Material Safety and Safeguards (NMSS) Director's decision on initial certification, USEC will provide quarterly reports to NRC on the implementation status of Compliance Plan commitments. These quarterly status reports will include, where appropriate, proposed revisions to remove the discussions of noncompliances that have been closed. The reports will also include an executive summary that identifies plans of actions that were completed during the past quarter, plans of actions scheduled to be completed *[sic]* during the next quarter, and a discussion of any plans of actions that are behind schedule¹. The executive summary will be supported by a detailed listing, sorted by noncompliance, of the individual commitments within each plan of action. The listing will include a comparison of the commitment completion date with the current projected completion date for each individual commitment that has not been completed. The first such report will be provided to NRC no later than 90 days after the NMSS Director's decision on initial certification. These reports will be provided until either all plans of action in the PORTS or PGDP Compliance Plan have been completed or the NRC agrees that the reports are no longer necessary."

For ease of reporting, USEC has established a cutoff date of November 30, 1996, for Compliance Plan issues closed or coming due in the next ninety days. The cutoff date for subsequent quarterly Compliance Plan Reports will follow this pattern (i.e., end of February, May, August, and November) and the report will be submitted to NRC by the middle of the following month.

¹The "plans of actions" in this sentence are coincident with the Compliance Plan issues. To address and resolve each issue, the plan of action for that issue must be completed.

The following is a summary of information included in this quarterly Compliance Plan report:

II. Proposed Revisions to the Compliance Plans for "Closed" Noncompliances

In the Compliance Plans, USEC committed to provide NRC with "proposed revisions to remove the discussions of noncompliances that have been closed." Section III below identifies those Compliance Plan Issues which USEC has completed² as of the cutoff date for this report. USEC will reflect the results of DOE or NRC "closure" activities relating to Compliance Plan issues in future reports. Additionally, Table 1 lists the Certificate Amendment Requests (CARs) that USEC has submitted to NRC that affect Compliance Plan due dates. Updates to the Compliance Plans to reflect completed or closed Compliance Plan issues actions will be submitted to NRC as part of Certificate of Compliance amendments or renewals required by 10 CFR 76.

III. Completed Compliance Plan Issues

Of the 106 Compliance Plan issues, 28 (i.e., approximately 27%) have been completed as of November 30, 1996, and are listed in Table 2. Of the approximate 450 Compliance Plan actions, about 150 (i.e., 33%) have been completed as of November 30, 1996.

Future Compliance Plan reports will identify those issues that were completed during the previous quarter and also identify any issues that are considered closed by the regulator.

IV. Compliance Plan Issues that are Scheduled to be Completed During the Next Quarter

There are 16 Compliance Plan issues coming due between December 1, 1996 and March 3, 1997 (i.e., the date of NRC transition). These issues are listed in Table 3.

V. Discussion of Any Compliance Plan Issues that are Behind Schedule

Table 1 identifies those CARs that USEC has submitted to revise Compliance Plan due dates. Additionally, Table 3 identifies those Compliance Plan issues that have completion dates between December 1, 1996 and March 3, 1997, but are currently behind schedule. USEC is placing additional emphasis on these issues to complete them within their required due dates. As previously noted, USEC is required to submit a CAR for NRC review and approval if we cannot complete a Compliance Plan issue within its required due dates.

²The term "complete" means that USEC has fulfilled all of the individual actions described in a Compliance Plan issue. A Compliance Plan issue is considered "closed" when the regulator has reviewed and concurred that all actions have been completed and documented its review in writing.

VI. Detailed Listing of the Individual Commitments within each Compliance Plan Issue

Enclosure 1 to this report lists each Compliance Plan Issue, a description of the commitments for each issue, the due date committed to in the Compliance Plan, and identifies if the commitment has been completed. This report also reflects any extension requests to Compliance Plan due dates shown in Table 1.

TABLE 1

PROPOSED REVISIONS TO THE COMPLIANCE PLANS

Date of Certificate Amendment Request	USEC Letter No.	Description of Proposed Revision	Status
10/31/96	GDP 96-0190	The proposed change will revise the due dates for completing the NCSAs and NCSEs as described in PORTS Compliance Plan Issues 8, 9, 23, 24, 30, and 32.	Responding to NRC comments
10/31/96	GDP-96-0191	This change proposes to revise the completion date for the first item in the Plan of Action and Schedule for PGDP Compliance Plan Issue 14 from October 31, 1996 to November 22, 1996.	NRC plans to take no action on this and will note this in their first Amendment approval.
11/04/96	GDP-96-0192	This change proposes to extend the completion date committed to in PORTS Compliance Plan Issue A.4 (first action item) for removal of HEU from all leased areas (except for de minimis total quantities not to exceed 999 grams of ^{235}U) from November 15, 1996 to February 28, 1997.	Responded to NRC comments, awaiting NRC approval

TABLE 2

DESCRIPTION OF COMPLETED COMPLIANCE PLAN ISSUES

<i>PORTSMOUTH</i>	
<i>ISSUE NO.</i>	<i>DESCRIPTION OF ISSUE</i>
5	X-705 Isolation Valve Testing
6	X-705 Microfiltration Influent pH Shutdown System Replacement
10	Nuclear Criticality Safety Training for Managers
12	Radiation Protection Procedures
14	NVLAP Certification
15	Fire Protection Compensatory Measures
16	Fire Protection Sprinkler Testing
19	Packaging and Transportation
27	Assessments
33	Emergency Plan Support Documents
34	Training for Emergency Preparedness
35	Quality Control Program for Low-Level Waste Disposal
40	Operational/Safety System Trip Redundancy

TABLE 2

DESCRIPTION OF COMPLETED COMPLIANCE PLAN ISSUES

<i>PADUCAH</i>	
<i>ISSUE NO.</i>	<i>DESCRIPTION OF ISSUE</i>
4	C-360 Crane Upgrades
6	Nuclear Criticality Safety Approval Implementation
7	Criticality Accident Alarm System Coverage
9	Radiation Protection Procedures
11	Radioactive Calibration Source Accuracy
12	NVLAP Certifications
13	Fire Alarm System Reliability
15	Fire Protection Equipment
18	Packaging and Transportation
32	Emergency Plan Support Documents
33	Training for Emergency Response Organization
34	Quality Control Program for Low-Level Waste Disposal
48	Cascade Cell Trip Function System Requirements
A.3	Receipts Based on Measured Values
A.4	Inventory Program for Uranium Holdup

TABLE 3

**COMPLIANCE PLAN ISSUES COMING DUE
DURING THE NEXT QUARTER**

<i>PORTSMOUTH</i>			
<i>ISSUE NO.</i>	<i>DESCRIPTION OF ISSUE</i>	<i>DUE DATE</i>	<i>STATUS</i>
1	Transition from DOE Regulation to NRC Regulation	Transition	On schedule
4	X-705 Evaporator Heat Exchanger Modifications	12/31/96	On schedule
8	Nuclear Criticality Safety Approval Documents	Transition	Behind schedule
22	Safety Committees	Transition	On schedule
28	Event Investigations and Reporting Program	Transition	On schedule
36	Depleted Uranium Management Plan	12/31/96	On schedule
37	Administrative Controls on Overtime	12/31/96	On schedule
41	Codes and Standards	2/1/97	On schedule
A5	DOE Materials Stored in Leased Space	12/31/96	Behind schedule, USEC is working with DOE to complete this issue.

TABLE 3

**COMPLIANCE PLAN ISSUES COMING DUE
DURING THE NEXT QUARTER**

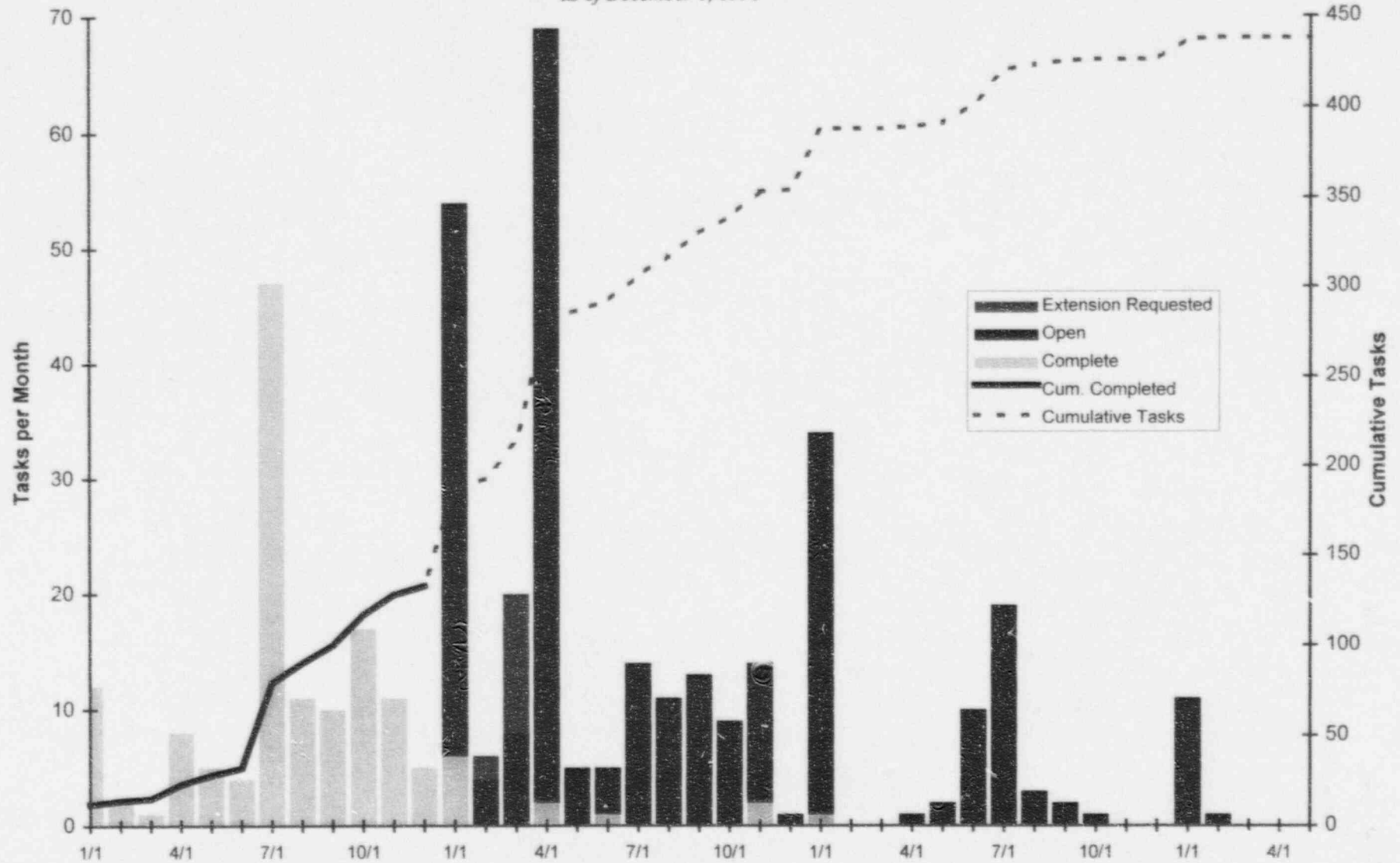
<i>PADUCAH</i>			
<i>ISSUE NO.</i>	<i>DESCRIPTION OF ISSUE</i>	<i>DUE DATE</i>	<i>STATUS</i>
1	Transition from DOE Regulation to NRC Regulation	Transition	On Schedule
5	Nuclear Criticality Safety Approval Documents	Transition	Behind Schedule
20	Safety Committees	Transition	On schedule
25	Event Investigations and Reporting Program	Transition	On schedule
45	Codes and Standards	2/1/97	On schedule
A2	Measurement Systems	12/31/96	On schedule
A7	DOE Materials Stored in Leased Space	12/31/96	Behind schedule, USEC is working with DOE to complete this issue.

FIGURE 1

SUMMARY OF INDIVIDUAL COMPLIANCE PLAN ACTIONS

Compliance Plan Tasks

as of December 1, 1996



ENCLOSURE 1

DESCRIPTION OF COMPLIANCE PLAN ISSUES AND ACTIONS

ENCLOSURE 1

PORTS Action Status by Issue

16-Dec-96

FACILITY	ISSUE #	TASK ID	DUE DATE	COMMITMENT DESCRIPTION	STATUS
PORTS	01	CPI-POA-C01.01	Transition	Some of the activities necessary for USEC to implement this phased transition are described in this Compliance Plan. USEC is currently developing additional detailed plans and schedules to implement the phased transition. Consistent with ROA requirements 3.2.2.2, 3.3.2.6, and 3.4.2.3, DOE will review all proposed changes from OSRs to TSRs, and USEC will not implement any such changes without the consent and written approval of the DOE Regulatory Oversight Manager.	
		CPI-POA-X01.01	Transition	Some of the activities necessary for USEC to implement this phased transition are described in this Compliance Plan. USEC is currently developing additional detailed plans and schedules to implement the phased transition. Consistent with ROA requirements 3.2.2.2, 3.3.2.6, and 3.4.2.3, DOE will review all proposed changes from OSRs to TSRs, and USEC will not implement any such changes without the consent and written approval of the DOE Regulatory Oversight Manager.	
		CPI-POA-X01.02	Transition	In the interest of assuring a safe, smooth transition from DOE to NRC regulatory authority, including a safe transition from OSRs to TSRs, USEC will keep the DOE Regulatory Oversight Manager and the NRC fully informed of USEC plans, schedules, and the status of activities to implement the phased transition. The information USEC will provide will include detailed tasks, schedules, and milestones for completing the transition; identification of areas requiring interface reviews and the schedules for performing such review and the schedules for procedure development, personnel training, and operational readiness evaluations. Except as identified in this Compliance Plan, all activities required to complete the transition from compliance with DOE requirements to NRC regulations will be completed by the date NRC assumes regulatory authority. The transition to NRC regulatory oversight is scheduled to occur 120 days after the NMSS Director's decision regarding USEC's certification.	
		CPI-POA-X01.03	Transition	The listing of open USEC commitments to DOE will be provided to NRC by USEC on the date that NRC assumes regulatory authority for PGDP.	
PORTS	02	CPI-POA-X02.01	2/15/97	The approved DOE site-wide Safety Analysis Report and supporting documentation will then be forwarded to USEC by February 15, 1997.	
		CPI-POA-X02.02	4/1/97	USEC will provide information required to complete the DOE site-wide Safety Analysis Report and will provide technical reviews of the ongoing analyses to ensure that the analyses accurately reflect the facility configuration.	
		CPI-POA-X02.03a	8/17/97	By no later than August 17, 1997, USEC shall submit an amendment to their Certification Application which includes: a) identification of all information, findings, and recommendations which indicate differences between the DOE site-wide Safety Analysis Report and the USEC Application for Certification.	

FACILITY	ISSUE #	TASK ID	DUE DATE	COMMITMENT DESCRIPTION	STATUS
		CPI-POA-X02.03b	8/17/97	By no later than August 17, 1997, USEC shall submit an amendment to their Certification Application which includes: b) an evaluation of the effects of those differences on the safety of workers, and off-site members of the public.	
		CPI-POA-X02.03c	8/17/97	By no later than August 17, 1997, USEC shall submit an amendment to their Certification Application which includes: c) proposed modifications to the compliance certificate and/or facility, including proposed modifications to the Application SAR and TSRs.	
		CPI-POA-X02.04	8/17/97	At the same time the Application amendment is due, USEC shall also submit for NRC approval, its proposed resolution of matters contained in the DOE-approved site-wide Safety Analysis Report not incorporated by USEC in its request for amendment of their Application for Certification.	
		CPI-POA-X02.05a	9/30/97	From September 30, 1995, until NRC approves the submittals in paragraphs 3 and 4 above, changes made by USEC in accordance with DOE's ROA requirement concerning Unreviewed Safety Question Determinations (USQDs) or with 10 CFR 76.68 must be addressed either in the DOE SAR Upgrade results or in the amended safety analysis report submitted by USEC based upon those results. The following will assure such changes are properly considered and addressed:	
		CPI-POA-X02.05b	9/30/97	From September 30, 1995, until NRC approves the submittals in paragraphs 3 and 4 above, changes made by USEC in accordance with DOE's ROA requirement concerning Unreviewed Safety Question Determinations (USQDs) or with 10 CFR 76.68 must be addressed either in the DOE SAR Upgrade results or in the amended safety analysis report submitted by USEC based upon those results. The following will assure such changes are properly considered and addressed: - Changes made to the plants after September 30, 1995, will be addressed by USEC in its amendment Application. The amendment Application will reflect the plant as it exists 6 months before the amendment submittal.	
		CPI-POA-X02.05c	9/30/97	From September 30, 1995, until NRC approves the submittals in paragraphs 3 and 4 above, changes made by USEC in accordance with DOE's ROA requirement concerning Unreviewed Safety Question Determinations (USQDs) or with 10 CFR 76.68 must be addressed either in the DOE SAR Upgrade results or in the amended safety analysis report submitted by USEC based upon those results. The following will assure such changes are properly considered and addressed: - Once the amendment is submitted, USEC will inform NRC of changes that are made in accordance with 10 CFR 76.68 that could render the amendment to be incorrect, inaccurate, or incomplete until the amendment is approved by NRC.	
		CPI-POA-X02.05d	4/30/98	From September 30, 1995, until NRC approves the submittals in paragraphs 3 and 4 above, changes made by USEC in accordance with DOE's ROA requirement concerning Unreviewed Safety Question Determinations (USQDs) or with 10 CFR 76.68 must be addressed either in the DOE SAR Upgrade results or in the amended safety analysis report submitted by USEC based upon those results. The following will assure such changes are properly considered and addressed: - NRC is notified of changes made in accordance with 10 CFR 76.68 as part of the annual Application for renewal required by 10 CFR 76.36.	

FACILITY	ISSUE #	TASK ID	DUE DATE	COMMITMENT DESCRIPTION	STATUS
PORTS	03	CPI-POA-X02.06	8/17/97	The update to the Application SAR will also reflect those commitments made by USEC to the NRC during the initial certification Application process as identified in the Application and the responses to NRC questions/comments.	
		CPI-POA-X03.01a	7/1/97	Provide the capability to separately test the inner and outer loop containment valves on the autoclaves in X-342A, X-343, and X-344A.	
		CPI-POA-X03.01b	7/1/97	A revised TSR to reflect the new [inner and outer loop containment valve test] configuration will be submitted to NRC by July 1, 1997.	
		CPI-POA-X03.01c	Certification	The TSRs for all autoclaves will be revised to declare an autoclave inoperable and taken out of service when any containment valve is determined to be inoperable until the capability to perform autoclave pressure decay testing with inner loop and outer loop containment valves is provided.	
		CPI-POA-X03.02a	5/1/98	Install fail-safe containment valves upstream of the UF6 feed isolation and flow control valves on the autoclaves in X-342A and X-343 and modify the programmable logic control system.	
		CPI-POA-X03.02b	5/1/98	Install fail-safe containment valves on the liquid UF6 drain line on autoclaves 3 and 4 in X-344A.	
		CPI-POA-X03.02c	5/1/98	Replace or modify the daughter cylinder isolation valves on the autoclaves in X-344A for fail-safe (i.e., closed) position on loss of air.	
		CPI-POA-X03.03	5/1/98	Add a low air pressure switch to autoclave 2 in X-344A to initiate containment upon loss of air to pressure transmitter PT-134.	
		CPI-POA-X03.04	5/1/98	Modify the High Pressure Containment Shutdown System controls for the autoclaves in X-342A, X-343, and X-344A to prevent them from being inadvertently opened when the pressure in the autoclave exceeds the setpoint as defined in the Technical Safety Requirements.	
		CPI-POA-X03.05	5/1/98	Upgrade the internal autoclave and UF6 cylinder pressure transmitters to improve their temperature compensation capability and accuracy in the operating pressure range.	
		CPI-POA-X03.06	5/1/98	Provide operational alarms on the autoclave safety systems to alert operators to potential upset conditions.	
		CPI-POA-X03.07	5/1/98	Modify the autoclave steam supply and condensate removal systems in X-342A, X-343, and X-344A to minimize the back up of condensate in the autoclave.	
		CPI-POA-X03.08	5/1/98	Restore the autoclave head/shell sealing surfaces for the autoclaves in X-342A, X-343, and X-344A.	
		CPI-POA-X03.09	5/1/98	A code interpretation from the ASME Code Committee will be obtained regarding the need for pressure relief for the UF6 cylinders. Based on this interpretation, the need for modifications to the affected system operations will be assessed. Both the ASME Code interpretation and the assessment results will be submitted to NRC for review and approval.	
		CPI-POA-X03.10a	12/31/96	Pressure decay testing procedures that assure that backpressure does not mask leaks in autoclave steam admission lines will be implemented by December 31, 1996.	
		CPI-POA-X03.10b	12/31/96	Modifications to the buffer air supply lines on nine autoclaves to eliminate backpressure masking and resulting changes to pressure decay testing procedures will be made.	

FACILITY	ISSUE #	TASK ID	DUE DATE	COMMITMENT DESCRIPTION	STATUS
PORTS	04	CPI-POA-X03.11	3/31/98	A detailed schedule for completion of these action will be available for review at PORTS.	
		CPI-POA-X03.12	2/1/2001	The completion schedule for the remaining twelve autoclaves will be such that the final autoclave is complete by February 1, 2001.	
	04	CPI-POA-X04.01	12/31/96	Install instrumentation and system modifications in the steam condensate drain piping from the evaporator heat exchangers to provide double contingency for nuclear criticality safety.	
		CPI-POA-X04.02	12/31/96	Replace the evaporator heat exchangers to eliminate the unfavorable geometry expansion joint.	
PORTS	05	CPI-POA-X05.01	6/30/96	Block valves, test taps, and a valve leak test cart have been installed to allow leak testing of the following isolation valves: (1) the uranyl nitrate feed isolation valves to the X-705 calciners feed pumps and (2) the isolation valves between the microfiltration units bag filters and effluent storage tank. The leak testing of these isolation valves will commence prior to June 30, 1996.	Complete
PORTS	06	CPI-POA-X06.01a	6/30/96	Repipe a section of the feed system to the microfiltration process.	Complete
		CPI-POA-X06.01b	6/30/96	Deactivate the microfiltration influent pH shutdown system (located between second stage pH adjust and the microfiltration feed tank).	Complete
		CPI-POA-X06.01c	6/30/96	Install a microfiltration effluent pH shutdown system (located between the microfiltration modules and the effluent tank).	Complete
PORTS		CPI-POA-X07.01a	6/30/97	The fixed HEPA filter systems required to practice ALARA principles and to control worker exposure will be retrofitted or replaced with new systems to allow testing in accordance with (1) the requirements of ANSI/ASME N510 or (2) the intent of the requirements of ANSI/ASME N510 for systems not designed to ANSI/ASME N509.	
		CPI-POA-X07.01b	6/30/97	Also, efforts are underway to develop a database of portable HEPA filtration units and to perform in-place leak testing of all portable HEPA filter units.	
PORTS	08	CPI-POA-X08.01	2/28/97	Formal NCSAs and NCSEs will be completed for all current operations involving uranium enriched to 1 wt % or higher ²³⁵ U and 15 grams or more ²³⁵ U by November 30, 1996, and will be properly documented and approved in accordance with the NCS program requirements contained in the approved Certificate.	Ext Requested

FACILITY	ISSUE #	TASK ID	DUE DATE	COMMITMENT DESCRIPTION	STATUS
		CPI-POA-X08.02	11/30/96	The procedural changes to resolve the administrative noncompliances in the nuclear criticality safety program will be completed by November 30, 1996.	Complete
		CPI-POA-X08.03	Transition	All aspects of Technical Safety Requirement 3.9 implementation and its associated tentacles for NCS will be in place no later than the transition to NRC regulatory oversight.	
PORTS	09				
		CPI-POA-X09.01a	Transition See issue 8	A program is in place to review all NCSAs in order to identify and track the designated NCS conditions, specifications, and controls and to verify their full implementation. Particular attention is being focused on ensuring consistency between each NCSA and the operation including work-site postings. The verification program (of the roughly 150 operating procedures and 150 postings) will be completed for all current fissile material operations, prior to NRC assuming regulatory oversight of PORTS for NCSAs that need to flow into Technical Safety Requirements.	
		CPI-POA-X09.01b	1/31/97	Identification of the remaining NCSA requirements to be flowed-down into procedures will be completed by December 2, 1996.	Ext Requested
		CPI-POA-X09.01c	2/28/97	A procedure for container handling and storage will be developed prior to December 2, 1996.	Ext Requested
		CPI-POA-X09.02	12/2/96	The procedural changes to resolve the administrative noncompliances in the Nuclear Criticality Safety Program (from SAR Section 5.2.4 and as identified in the Summary of Requirements and Commitments table below) will be completed by December 2, 1996.	Complete
		CPI-POA-X09.03	Transition	All aspects of Technical Safety Requirement 3.9 implementation and its associated tentacles for NCS will be in place no later than the transition to NRC regulatory oversight.	
		CPI-POA-X09.04	Also see Issue 30	The plant-wide procedure upgrade initiative will provide additional assurance of the full and proper flow-down of NCS conditions and specifications to operating procedures and postings. The compliance plan item entitled "Procedures Program" addresses the implementation of operating procedures.	
		CPI-POA-X09.05	On Going	If a new or revised NCSE identifies the need for modifications to the existing plant configuration, affected activities will be curtailed and will not be restarted until either (1) the plant configuration is modified or (2) the activity is modified so that it can be performed safely in the current configuration. If the plant configuration or activity is modified, the Plant Operations Review Committee will review the proposed modification prior to its resumption to verify that the activity, as modified, can be performed safely.	
PORTS	10				
		CPI-POA-X10.01	3/31/96	A list of managers who require training for oversight of nuclear criticality issues will be developed.	Complete
		CPI-POA-X10.02	3/31/96	Individuals requiring training will complete the designated NCS manager training course.	Complete
PORTS	11				

FACILITY	ISSUE #	TASK ID	DUE DATE	COMMITMENT DESCRIPTION	STATUS
PORTS	12	CPI-POA-X11.01	9/30/96	USEC will provide criticality detector coverage in all areas of the plant except for those areas identified and justified by USEC and approved by NRC. Analyses that provide the technical justification for not providing criticality accident alarm system coverage in designated areas of the plant are being developed. Except for Buildings X-330, X-333, and X-700, analyses have been submitted to NRC that (1) verify the adequacy of the existing criticality accident alarm system and its detector locations for detecting a criticality accident and (2) justify that detectors are not required for monitoring other areas of the plant. The analyses for Buildings X-330, X-333, and X-700 will be completed by September 30, 1996.	Complete
		CPI-POA-X11.02	7/1/98	The analyses already submitted identified the need to tie the evacuation horns in Building X-744H to the Building X-744G CAAS that provides detection coverage for Building X-744H. Building X-744H contains lightly contaminated waste with a comparatively low potential for a criticality accident.	
	12	CPI-POA-X12.01	10/24/95	The required procedure changes will be implemented.	Complete
		CPI-POA-X12.02	10/1/96	Plant procedures will be issued by October 1, 1996, to incorporate the annual radiation protection program review requirement from SAR paragraph 5.3.1.3.	Complete
PORTS	13	CPI-POA-X13.01	Transition	Building work areas previously posted as "Regulated Areas" will be re-posted to reflect the current "Restricted Area" and "Contamination Control Zone" designations	Complete
		CPI-POA-X13.02	12/31/96	Restricted areas within USEC leased space which contain unlabeled, but potentially radioactive, material containers will be posted with signs stating that each unlabeled container may contain radioactive material.	
		CPI-POA-X13.03	12/31/98	Necessary radiological characterization and re-posting of leased areas within the PORTS site boundary will be completed by December 31, 1998.	
PORTS	14	CPI-POA-X14.01	10/24/95	USEC will provide NVLAP-accredited dosimetry for those relatively few individuals who are required to be monitored under 10 CFR 20.1502.	Complete
PORTS	15	CPI-POA-X15.01	12/31/95	A procedure defining fire prevention requirements for compensatory action will be developed to address (1) preplanned and emergency impairment program, (2) limiting conditions for operation, and (3) compensatory actions.	Complete
PORTS	16	CPI-POA-X16.01	11/30/95	The Fire Department will test the fire systems at the required ORO Fire Protection periodic testing frequencies. Implementation of the testing frequencies will be completed by November 30, 1995.	Closed
PORTS	17				

FACILITY	ISSUE #	TASK ID	DUE DATE	COMMITMENT DESCRIPTION	STATUS
		CPI-POA-X17.01a	Also see Issue 30	The fire protection procedures will be created or revised as part of the overall procedure upgrade project by December 31, 1997.	
		CPI-POA-X17.01b	12/31/96	Fire Protection programmatic procedures (1) Standard Practice Procedure S-20, "Fire Protection"; (2) "Fire Protection Requirements for Welding, Burning, and Hotwork Practices," UE2-SS-FS1031; and (3) a formal procedure for the performance of fire hazard assessments will be upgraded and implemented by December 31, 1996.	
		CPI-POA-X17.01c	12/31/96	The hot work permit procedure and applicable training programs will be revised to ensure Fire Services involvement and oversight of the hot work permit program by December 31, 1996.	
PORTS	18				
		CPI-POA-X18.01	10/1/96	The emergency packets will be updated by Emergency Management to reflect current facility configurations and conditions. This update will include the information required by the emergency packet control procedure including such information as: (1) general building/area layout drawings or sketches, (2) critical action, equipment, or material listing, (3) facility/area utility services, (4) facility emergency systems and equipment, (5) lists of hazardous, toxic, and/or radioactive materials, including compressed gases, and (6) list(s) of facility tenant organizations	Complete
		CPI-POA-X18.02	6/30/97	An analysis will be conducted by Fire Services personnel to determine the maximum allowable combustible loadings within the process buildings. The analysis will include determination of the existing combustible loadings of selected specific occupancy areas within the process buildings and the verification of the ability of the sprinklers to control these specific occupancy areas. Some local occupancy areas to be considered include burnable "Anti-C" waste storage, lube oil in process reserves, waste storage, maintenance shops, and stores. Building custodians will be provided information and training on recognizing the acceptable levels of combustible loading in the process buildings, both in general and in local areas.	
PORTS	19				
		CPI-POA-X19.01	4/30/96	Upon approval of the Packaging and Transportation Quality Assurance Plan and acceptance of USEC as holder of the NRC certificate of compliance for the Paducah Tiger overpack, USEC will begin shipment under the NRC certificate of compliance.	Complete
PORTS	20				
		CPI-POA-X20.01	5/26/97	DOE and Third-Party tenants will notify USEC before hazardous chemicals, including UF6 and UF4, are introduced onto the site. All initial process hazards analyses are to be completed by May 26, 1997.	
		CPI-POA-X20.02	3/14/96	Finalize the resolution document and forward to NRC	Complete
		CPI-POA-X20.03	5/26/96	Complete 75% of the initial process hazard analyses to conform with the federally mandated requirement.	Complete
		CPI-POA-X20.04	6/28/96	If the material exceeds specified CFR threshold quantities, a safety risk will be performed to identify the hazardous and mitigating actions in accordance with those regulations. If required, develop and distribute DOE directive.	Complete
PORTS	21				

FACILITY	ISSUE #	TASK ID	DUE DATE	COMMITMENT DESCRIPTION	STATUS
		CPI-POA-X21.01a	Also see Issue 30	For Q to support TSRs and AQ-NCS: QAP and Regulatory Requirements Flowdown - Quality Assurance Program requirements and applicable NRC requirements will be flowed down to policies that will be approved and implemented at USEC Headquarters and PORTS in accordance with the Plan of Action and Schedule described in Issue 30, "Procedure Program."	
		CPI-POA-X21.01b	12/31/97	For balance of Q and other AQ: QAP and Regulatory Requirements Flowdown - Quality Assurance Program requirements and applicable NRC requirements will be flowed down to procedures that will be approved and implemented at USEC Headquarters and PORTS in accordance with the Plan of Action and Schedule described in Issue 30, "Procedure Program."	
		CPI-POA-X21.02a	Transition	Organizational Roles, Responsibilities, Relationships, and Authorities Flowdown - The flowdown to committed position descriptions provided in Section 6.1 of the USEC Application will be completed and position descriptions revised, if necessary, by the date that NRC assumes regulatory authority.	
		CPI-POA-X21.02b	12/31/97	The position descriptions will again be reviewed and revised, if necessary, by December 31, 1997.	
PORTS	22	CPI-POA-X22.01	Transition	A charter for the PORC is in place; however, it requires revision to ensure consistency with commitments made in the NRC-approved Safety Analysis Report Section 6.2 and Technical Safety Requirement 3.10. This review and the charter upgrade will be completed and implemented by the date that NRC assumes regulatory authority.	
PORTS	23	CPI-POA-X23.01a1	12/31/96	Identify and document all Q items including system boundaries and support systems required for performance of the intended safety function, to be included in the scope of the Configuration Management Program.	
		CPI-POA-X23.01a2	2/28/97	Identify and document all AQ-NCS items including system boundaries and support systems required for performance of the intended safety function, to be included in the scope of the Configuration Management Program.	Ext Requested
		CPI-POA-X23.01a3	10/1/97	Identify and document all other AQ items including system boundaries and support systems required for performance of the intended safety function, to be included in the scope of the Configuration Management Program.	
		CPI-POA-X23.01b	Transition	Develop the flowdown of commitments from the Technical Safety Requirements, the Safety Analysis Report, and other plans and programs to procedures and training.	
		CPI-POA-X23.01c	12/31/97	Incorporate new Technical Safety Requirements into the surveillance testing and administrative procedures.	
		CPI-POA-X23.01d	10/1/97	Identify and document all other AQ items, including system boundaries and support systems required for performance of the intended safety function, to be included in the scope of the Configuration Management Program.	
		CPI-POA-X23.02a	12/31/96	Develop the baseline documentation that establishes the design requirements for all Q systems/items, including support systems required for performance of the intended safety function.	

FACILITY	ISSUE #	TASK ID	DUE DATE	COMMITMENT DESCRIPTION	STATUS
		CPI-POA-X23.02b	2/28/97	Review all Nuclear Criticality Safety Approvals and Nuclear Criticality Safety Evaluations to identify AQ-NCS items (items which support the nuclear criticality double contingency principle); to identify and document the designated design requirements and system boundaries, including support systems required for performance of the intended safety function, and to verify the implementation of these requirements. To the extent completed, this information will be maintained and made available to the NRC, before regulatory jurisdiction, for planned inspection activities.	Ext Requested
		CPI-POA-X23.02c	10/1/97	Identify, document, and communicate definitive boundaries for the other AQ systems. Identify and document the design requirements for these AQ systems/items, including support systems required for performance of the required safety function, for which the design requirements must be known.	
		CPI-POA-X23.03a	Also see Issue 29	Develop improved records management and document control programs to satisfy the needs of the Configuration Management Program. Develop and implement the required procedures.	Complete
		CPI-POA-X23.03b	Also see Issue 29	Train appropriate plant personnel in the requirements of these programs and procedures.	Complete
		CPI-POA-X23.04a	7/31/96	Upgrade the four core engineering procedures that specify the requirements for the change control process to ensure the identification, technical and safety review, approval, implementation, validation, documentation, and recording of plant changes.	Complete
		CPI-POA-X23.04b	7/31/96	Train appropriate personnel to ensure proper implementation and application of these upgraded core procedures.	Complete
		CPI-POA-X23.04c	3/31/97	Develop or upgrade remaining engineering procedures that are associated with the change control process and train appropriate personnel on these new or upgraded procedures.	
		CPI-POA-X23.05a	See Issue 30	Develop procedures required to implement an assessment program to systematically evaluate the development and effective implementation of the Configuration Management Program elements and related processes.	
		CPI-POA-X23.05b	See Issue 30	Train appropriate personnel to ensure proper implementation and application of these procedures.	
		CPI-POA-X23.06	Also see Issue 26	Implement a training program for plant personnel relied upon to operate, maintain, or modify the plant. Include initial training on improved or newly developed programs and procedures identified as required to support the Configuration Management Program objectives.	
PORTS	24	CPI-POA-X24.01	See Issues 26 and 30	Develop and implement a maintenance history and trend analysis program. - Develop a master equipment list for safety critical equipment. - Implement a new computer-based maintenance management system with the capability to collect and trend the data.	
		CPI-POA-X24.02	7/31/96	Develop guidance for cleanliners control and measures to prevent entry of extraneous material into a closed system.	Complete

FACILITY	ISSUE #	TASK ID	DUE DATE	COMMITMENT DESCRIPTION	STATUS
		CPI-POA-X24.03a	4/30/97	<p>For Q items: Upgrade the current maintenance work control process to provide the committed level of planning and work package development for Q items.</p> <ul style="list-style-type: none"> - Centralize all planning and work control functions in the Work Control organization. (Complete) - Revise the work control procedure. - Develop and provide training on the upgraded work control process. 	
		CPI-POA-X24.03b	2/28/97	<p>For AQ-NCS items: Upgrade the current maintenance work control process to provide the committed level of planning and work package development AQ-NCS items.</p> <ul style="list-style-type: none"> - Centralize all planning and work control functions in the Work Control organization. (Complete) - Revise the work control procedure. - Develop and provide training on the upgraded work control process. 	Ext Requested
		CPI-POA-X24.03c	6/30/98	<p>For other AQ items: Upgrade the current maintenance work control process to provide the committed level of planning and work package development other AQ items.</p> <ul style="list-style-type: none"> - Centralize all planning and work control functions in the Work Control organization. (Complete) - Revise the work control procedure. - Develop and provide training on the upgraded work control process. 	
		CPI-POA-X24.04a	2/28/97	<p>For AQ-NCS items: Upgrade the preventive maintenance program to meet the commitments for greater formalism.</p> <ul style="list-style-type: none"> - Develop an overall performance indicator to measure preventive maintenance effectiveness. - Identify current preventive maintenance performed on Q, AQ-NCS, and other AQ items. - Revise the preventive maintenance program procedure to establish a formal mechanism to justify and document changes to Q, AQ-NCS, and other AQ item requirements. - Develop the technical/historical basis for use in evaluating preventive maintenance task adequacy. 	Ext Requested
		CPI-POA-X24.04b	3/31/97	<p>For Q items: Upgrade the preventive maintenance program to meet the commitments for greater formalism.</p> <ul style="list-style-type: none"> - Develop an overall performance indicator to measure preventive maintenance effectiveness. - Identify current preventive maintenance performed on Q, AQ-NCS, and other AQ items. - Revise the preventive maintenance program procedure to establish a formal mechanism to justify and document changes to Q, AQ-NCS, and other AQ item requirements. - Develop the technical/historical basis for use in evaluating preventive maintenance task adequacy. 	
		CPI-POA-X24.04c	6/30/98	<p>For other AQ items: Upgrade the preventive maintenance program to meet the commitments for greater formalism.</p> <ul style="list-style-type: none"> - Develop an overall performance indicator to measure preventive maintenance effectiveness. - Identify current preventive maintenance performed on Q, AQ-NCS, and other AQ items. - Revise the preventive maintenance program procedure to establish a formal mechanism to justify and document changes to Q, AQ-NCS, and other AQ item requirements. - Develop the technical/historical basis for use in evaluating preventive maintenance task adequacy. 	

FACILITY	ISSUE #	TASK ID	DUE DATE	COMMITMENT DESCRIPTION	STATUS
		CPI-POA-X24.05a	2/28/97	For AQ-NCS M&TE: Revise the measuring and test equipment calibration program to meet the more formal requirements. - Implement procedures that define and control the overall measuring and test equipment program. (Complete) - Develop and implement individual calibration procedures for Q, AQ-NCS, and other AQ SSCs. - Provide training on calibration requirements to affected coordinators, managers, technicians, and users.	Ext Requested
		CPI-POA-X24.05b	12/31/96	For Q M&TE: Revise the measuring and test equipment calibration program to meet the more formal requirements. - Implement procedures that define and control the overall measuring and test equipment program. (Complete) - Develop and implement individual calibration procedures for Q, AQ-NCS, and other AQ SSCs. - Provide training on calibration requirements to affected coordinators, managers, technicians, and users.	
		CPI-POA-X24.05c	12/31/97	For other AQ M&TE: Revise the measuring and test equipment calibration program to meet the more formal requirements. - Implement procedures that define and control the overall measuring and test equipment program. (Complete) - Develop and implement individual calibration procedures for Q, AQ-NCS, and other AQ SSCs. - Provide training on calibration requirements to affected coordinators, managers, technicians, and users.	
		CPI-POA-X24.06a	10/31/96	For Q SSCs: Identify the procedural deficiencies for performing corrective maintenance, preventive maintenance, equipment calibration, or surveillance testing for Q, AQ-NCS, and other AQ SSCs and develop a composite listing of the procedures requiring revision, development, or conversion.	Complete
		CPI-POA-X24.06b	1/31/97	For AQ-NCS SSCs: Identify the procedural deficiencies for performing corrective maintenance, preventive maintenance, equipment calibration, or surveillance testing for Q, AQ-NCS, and other AQ SSCs and develop a composite listing of the procedures requiring revision, development, or conversion.	Ext Requested
		CPI-POA-X24.06c	10/31/97	For other AQ SSCs: Identify the procedural deficiencies for performing corrective maintenance, preventive maintenance, equipment calibration, or surveillance testing for Q, AQ-NCS, and other AQ SSCs and develop a composite listing of the procedures requiring revision, development, or conversion.	
		CPI-POA-X24.07	Transition	Develop procedures and provide the associated training of appropriate personnel for the performance of surveillance tests which are required to support Technical Safety Requirements.	
		CPI-POA-X24.08a	2/28/97	For AQ-NCS items: Revise, develop, or convert corrective maintenance, preventive maintenance, instrument calibration, and surveillance test procedures for AQ-NCS structures, systems, and components.	Ext Requested
		CPI-POA-X24.08b	3/31/97	For Q items: Revise, develop, or convert corrective maintenance, preventive maintenance, instrument calibration, and surveillance test procedures for Q structures, systems, and components.	
		CPI-POA-X24.08c	6/30/98	For other AQ items: Revise, develop, or convert corrective maintenance, preventive maintenance, instrument calibration, and surveillance test procedures for other AQ structures, systems, and components.	
		CPI-POA-X24.09a	2/28/97	For AQ-NCS items: Develop training materials for the work control, surveillance testing, instrument calibration, and corrective and preventive maintenance procedures and provide the associated training of appropriate personnel.	Ext Requested

FACILITY	ISSUE #	TASK ID	DUE DATE	COMMITMENT DESCRIPTION	STATUS
		CPI-POA-X24.09b	3/31/97	For Q items: Develop training materials for the work control, surveillance testing, instrument calibration, and corrective and preventive maintenance procedures and provide the associated training of appropriate personnel.	
		CPI-POA-X24.09c	6/30/98	For other AQ items: Develop training materials for the work control, surveillance testing, instrument calibration, and corrective and preventive maintenance procedures and provide the associated training of appropriate personnel.	
		CPI-POA-X24.10	3/31/97	Identify and control the vendors' manuals used for maintenance of Q equipment, including entering them into the document control and records management system. - Identify vendor manuals used for maintenance activities of Q equipment. - Verify appropriate vendors' manuals for accuracy and completeness. - Enter vendor manual data into the records management and document control system.	
PORTS	25				
		CPI-POA-X25.01	12/31/97	Procedures addressing the operations program elements discussed in Section 6.5 of the Safety Analysis Report will be developed or revised, associated initial training materials will be developed, and appropriate personnel will receive initial training by December 31, 1997, consistent with the plan of action and schedule of the Compliance Plan issue entitled "Procedures Program."	
		CPI-POA-X25.02	6/30/97	Continuing training material and qualification requirement development will be completed, and appropriate personnel trained and qualified for Cascade Operator, Feed and Product Operator, Chemical Operator, Uranium Material Handler, Operations Manager/Supervisor, and Plant Shift Superintendent positions by June 30, 1997, consistent with the plan of action and schedule of the Compliance Plan issue entitled "Systems Approach to Training."	
		CPI-POA-X25.03	12/31/97	Continuing training material and qualification requirement development will be completed, and appropriate personnel trained and qualified for Cascade Controller position by December 31, 1997, consistent with the plan of action and schedule of the Compliance Plan issue entitled "Systems Approach to Training."	
PORTS	26				
		CPI-POA-X26.01	6/30/97	Training programs will be developed and implemented based upon a systems approach to training for workers who are relied upon to operate, maintain, or modify structures, systems, and components identified as Q or AQ-NCS items. For the previously identified job classifications training for the job incumbents at certification will be completed by June 30, 1997.	
		CPI-POA-X26.02	6/27/96	A detailed schedule for the completion of all training programs not in compliance with 10 CFR 76.95 will be issued by June 27, 1996.	Complete
		CPI-POA-X26.03	6/30/97	For the additional job classifications not previously included in the Nuclear Safety Upgrade Project, (i.e., systems engineers, cascade coordinators, and NCS engineers/specialists), the job analyses and training program design have not been completed. The following actions will be completed by June 30, 1997. - Revise and validate the existing job task lists. - Design a curriculum that covers the job tasks selected for training. - Develop specific learning objectives from the job performance requirements. - Develop training materials.	

FACILITY	ISSUE #	TASK ID	DUE DATE	COMMITMENT DESCRIPTION	STATUS
		CPI-POA-X26.04	See CPI-POA-X26.3	Training for those holding these additional job classifications at the time the program is implemented will be completed by December 31, 1997.	
		CPI-POA-X26.05	6/30/98	Training programs for the job classifications list above, with respect to AQ activities, will be developed and implemented by June 30, 1998, following completion of identification of AQ items (see Compliance Plan Issue 23, "Plant Changes and Configuration Management") and associated procedures (see Compliance Plan Issue 30, "Procedures Program").	
PORTS	27	CPI-POA-X27.01	9/30/96	An organizational level assessment program will be implemented consisting of the preparation and implementation of a procedure for the performance of organizational level assessments in a uniform manner.	Complete
PORTS	28	CPI-POA-X28.01a	5/1/96	A nuclear regulatory event reporting procedure meeting the event notification and reporting requirements required by the USEC application, and an event investigations procedure that defines the event investigation process and assigns responsibilities and authority for its implementation will be approved by May 1, 1996.	Complete
		CPI-POA-X28.01b	Transition	Training on these documents will be completed prior to the date NRC assumes regulatory oversight at PORTS.	
		CPI-POA-X28.01c	Transition	The procedures will become effective on the date NRC assumes regulatory oversight at PORTS.	
PORTS	29	CPI-POA-X29.01a.1	6/30/96	Records being maintained by the plant organizations and Administrative Support will be verified to determine the storage locations of these records and the methods of protection being employed to preserve these documents.	Complete
		CPI-POA-X29.01a.2	6/30/96	The final tally of records identified in item (1) above will be evaluated against applicable requirements and then catalogued as to their record type, categorization, and retention. This information will be characterized in a combined PORTS and PGDP Uranium Enrichment Records Manual that will be utilized by both sites. Both the tally of records and the manual will be completed by June 30, 1996.	Complete
		CPI-POA-X29.01a.3	6/30/96	A records management turnover schedule has been drafted and submitted to the functional organizations which prioritizes the turnover based on the record's importance to the safety and quality of plant operations. This schedule will be formalized by June 30, 1996.	Complete
		CPI-POA-X29.01a.4	12/31/98	Records being maintained in the organizations will not be turned over to Administrative Support immediately but will be retained by the responsible organization until the D&R Group can process them. Pre-existing records will be turned over and incorporated into the records management system.	
		CPI-POA-X29.01a.5	6/30/96	A new electronic records indexing database based on the evaluation conducted in item (2) above and item 1.d(1) below will be put into service by June 30, 1996.	Complete
		CPI-POA-X29.01b	Also see Issue 23	For legacy records: The PORTS Configuration Management Program implementation procedures will address the measures required to be taken if source information needs to be developed and documented. See Issue 23, "Plant Changes and Configuration Management."	Complete

FACILITY	ISSUE #	TASK ID	DUE DATE	COMMITMENT DESCRIPTION	STATUS
PORTS	30	CPI-POA-X29.01c	12/31/98	Records being maintained in the organizations will be turned over to Administrative Support in accordance with the records management turnover schedule identified in item (a)(3) above. Pre-existing records required to be maintained under the USEC Quality Assurance Program will be turned over and incorporated into the revised records management system in accordance with the approved records management turnover schedule. After the turnover of an organization's records to Records Management, the temporary storage of subsequent records will be in one-hour fire-rated file cabinets.	
		CPI-POA-X29.01d.1	8/15/96	The PORTS computerized records indexing system will be evaluated to make certain that the necessary information required by each organization for its records is consistently applied to ensure the ready retrievability of the records.	Complete
		CPI-POA-X29.01d.2	12/31/98	Computer codes and test result data used to directly or indirectly support the PORTS process systems will be submitted to Administrative Support in accordance with the turnover schedule identified in item (a)(3) above.	
		CPI-POA-X29.02a.1	6/30/96	Documents being maintained by the plant organizations and Administrative Support will be verified.	Complete
		CPI-POA-X29.02a.2	6/30/96	A document control turnover schedule has been drafted which prioritizes the turnover based on the document's importance to the safety and quality of plant operations. This schedule will be formalized by June 30, 1996.	Complete
		CPI-POA-X29.02a.3	6/30/96	The document control system will be updated on an ongoing basis to provide controlled distribution lists and to control the actual distribution of documents under the control of the D&R Group commencing June 30, 1996.	Complete
		CPI-POA-X29.02a.4	12/31/98	Documents within the scope of the document control program, according to the application, will be identified. Documents being maintained in the organizations will not be turned over to Administrative Support but will be retained by the responsible division until Administrative Support can process them. Pre-existing documents will be turned over and incorporated into the document control system.	
		CPI-POA-X29.02a.5	12/31/98	The final tally of documents identified in items (1) and (3) above will be catalogued as to their document type, distribution requirements, and information to provide an index for ease of retrievability.	
		CPI-POA-X29.02a.6	6/30/96	The new electronic document control inventory system that identifies the controlled copy holder number and custodians, storage location, and retrieval capability will be put into service.	Complete
		CPI-POA-X29.02b	Also see Issue 23	For legacy documents: The plan of action and schedule provided in 1(b) above will also resolve this item.	Complete
		CPI-POA-X30.01	7/31/96	By July 31, 1996, incorporate into the Procedure Control Process procedure the SAR-6.11.4.1 criteria for use by responsible management in complying with TSR 3.9 by identifying applications requiring additional written procedures.	Complete
		CPI-POA-X30.04	6/1/96	Document the criteria for use in determining when work must be stopped because a procedure cannot be performed as written.	Complete
		CPI-POA-X30.06	Transition	By the date that the NRC assumes regulatory authority for PGDP, incorporate into the Procedure Control Process procedure the SAR-6.11.4.5 criteria for identifying procedures that TSR 3.9 requires review by the PORC.	

FACILITY	ISSUE #	TASK ID	DUE DATE	COMMITMENT DESCRIPTION	STATUS
PORTS	32	CPI-POA-X30.08	Transition	Incorporate action statements and operating limits from the Technical Safety Requirements into operational procedures by the date that the NRC assumes regulatory authority for PORTS.	Complete
		CPI-POA-X30.09a	6/28/96	Issue the required operational policy statements and implement new or updated procedures (including required training) to fully implement the Quality Assurance Program or other activities identified in the application in accordance with the following schedule: - Operational policy statements: June 28, 1996	
		CPI-POA-X30.09b	2/28/97	Issue the required operational policy statements and implement new or updated procedures (including required training) to fully implement the Quality Assurance Program or other activities identified in the application in accordance with the following schedule: - Level 2, 3, and 4 AQ-NCS procedures (unless covered by item 8): December 31, 1996	Ext Requested
		CPI-POA-X30.09c	3/31/97	Issue the required operational policy statements and implement new or updated procedures (including required training) to fully implement the Quality Assurance Program or other activities identified in the application in accordance with the following schedule: - Level 2, 3, and 4 Q procedures (unless covered by item 8): March 31, 1997	
		CPI-POA-X30.09d	12/31/97	Issue the required operational policy statements and implement new or updated procedures (including required training) to fully implement the Quality Assurance Program or other activities identified in the application in accordance with the following schedule: - Level 2, 3, and 4 AQ and NS procedures: December 31, 1997	
		CPI-POA-X30.10	12/31/97	Issue analytical laboratory procedures updated to current requirements by December 31, 1997.	
		CPI-POA-X30.11	12/31/97	Complete all overdue Level 2, 3, and 4 AQ procedure periodic reviews by December 31, 1997.	
		CPI-POA-X30.12	Transition + 5 years	The PORC will review all procedures designated as In-Hand and procedures that involve liquid UF6 handling activities within a 5-year period after the date that the NRC assumes regulatory authority for PORTS. This commitment pertains only to those procedures which will not otherwise be reviewed by the PORC (as required by Section 6.11.4.1), or by a PORC subcommittee, before the expiration of the 5-year period. Procedures in this scope have been, and will continue to be, reviewed by a PORC subcommittee, thereby satisfying this commitment for those specific procedures.	
		CPI-POA-X30.13	Transition	All aspects of TSR 3.9 implementation and its associated tentacles shall be in place no later than the date that the NRC assumes regulatory authority for PORTS. Procedures required by Technical Safety Requirement 3.9.1 shall be in place by the assumption of regulatory authority by NRC except as specified in the Compliance Plan.	
		CPI-POA-X32.01	12/31/96	Develop and implement procedures, including personnel training, for the scheduling and conduct of internal and supplier audits, including auditing the development, maintenance, adequacy, and effectiveness of the QAP, by December 31, 1996.	Ext Requested
		CPI-POA-X32.02a	2/28/97	Develop and implement procedures, including personnel training, that define procurement, handling, and storage activities for AQ-NCS items and services by December 31, 1996.	

FACILITY	ISSUE #	TASK ID	DUE DATE	COMMITMENT DESCRIPTION	STATUS
		CPI-POA-X32.02b	3/31/97	Develop and implement procedures, including personnel training, that define procurement, handling, and storage activities for Q items and services by March 31, 1997.	
		CPI-POA-X32.02c	12/31/97	Develop and implement procedures, including personnel training, that define procurement, handling, and storage activities for other AQ items and services by December 31, 1997.	
PORTS	33	CPI-POA-X33.01	6/30/96	The emergency plan support documents will be upgraded.	Complete
PORTS	34	CPI-POA-X34.01a	9/30/96	All tenant organization personnel will be given emergency preparedness General Employee Training.	Complete
		CPI-POA-X34.01b	6/30/96	Updated formal training will be given to emergency response personnel.	Complete
		CPI-POA-X34.01c	12/31/96	Off-site emergency support personnel will be trained on the revised emergency plan and procedures as appropriate by December 31, 1996.	
PORTS	35	CPI-POA-X35.01	10/24/95	A quality control program including all elements necessary to ensure compliance with 10 CFR 61.55 and 10 CFR 61.56 will be implemented.	Complete
PORTS	36	CPI-POA-X36.01	12/31/96	Update existing depleted uranium handling, moving, stacking, and inspection procedures to current format and content requirements (see the compliance plan issue entitled "Procedures Program") and provide training to affected personnel.	
		CPI-POA-X36.02	12/31/96	Develop a process for use in scheduling the periodic visual inspections.	
PORTS	37	CPI-POA-X37.01a	8/1/96	The current staffing allocations will be supplemented if necessary to meet working hour guidelines stating that an individual should not be permitted to work more than 32 hours in any 48 hour period and no more than 80 hours in any 7 day period, excluding shift turnover time.	Complete
		CPI-POA-X37.01b	8/1/96	A revised TSR will be submitted to the NRC to add these guidelines to TSR 3.2.2.b.	Complete
		CPI-POA-X37.02a	12/31/96	USEC will supplement current staffing allocations to meet its proposed working hour guidelines that state that an individual should not be permitted to work more than 24 hours in any 48 hour period and no more than 72 hours in any 7 day period exclusive of shift turnover time.	
		CPI-POA-X37.02b	12/31/96	USEC will submitted a revised TSR to the NRC to add these guidelines to TSR 3.2.2.b at the time sufficient staffing is achieved to meet these guidelines.	
PORTS	38				

FACILITY	ISSUE #	TASK ID	DUE DATE	COMMITMENT DESCRIPTION	STATUS
		CPI-POA-X38.01	Privatization	<p>The following executed documents required to assure adequate funding for USEC's portion of PORTS's decontamination and decommissioning costs will be submitted to the NRC at the time USEC privatization occurs:</p> <ul style="list-style-type: none"> - an executed sinking fund arrangement, - a standby trust agreement, and/or - a payment surety bond. <p>The above-listed documents will closely adhere to the recommended wording for such instruments set forth in NRC Regulatory Guide 3.66, "Standard Format on and Content of Financial Assurance Mechanisms Required for Decommissioning under 10 CFR Parts 30, 40, 70, and 72."</p>	
PORTS	39	CPI-POA-X39.01	5/26/97	The mechanical integrity program for maintenance and inspection PSM requirements will be implemented.	
PORTS	40	CPI-POA-X40.01	10/1/96	A review of system designs will be performed where operational trips and alarms coincide with the setpoints for safety system actuation based on the same monitored parameter and the same equipment actuated. Where redundant operational and safety system actuations exist, corrective action will be identified that may include justification either for the redundancy or system modifications to eliminate the redundancy. The results of this review will be submitted to the NRC for review and approval by October 1, 1996.	Complete
PORTS	41	CPI-POA-X41.01	2/1/97	The documents referenced in Appendix A to SAR Chapter 1.0 will be reviewed, and a listing of specific sections of the codes, standards, and NRC regulatory guidance documents to which PORTS is committed will be compiled. The results will be transmitted to NRC at least 30 days prior to the date that the NRC assumes regulatory authority for PORTS.	
PORTS	42	CPI-POA-X42.01	7/31/97	USEC will develop and complete a program to relate the response of UF6 leak detectors to manual test methods and to the detection of an actual UF6 leak.	
PORTS	44	CPI-POA-X44.01a	7/31/97	<p>Unalarmed facilities that have been identified as of June 10, 1996, will be modified with the required horns and/or lights, as appropriate, or relocated to locations outside the 200-foot evacuation zone in accordance with the following schedule:</p> <p>Routinely Manned Facilities: July 1, 1997</p>	