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USEC

December 20, 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 96-0202

Paducah Gaseous Diffusion Plant (PGDP)

Docket Nos. 70-7001

Compliance Plan Issue 3, Action 10, Autoclave Containment Valve Pressure Decay Testing

Dear Mr. Pierson:

The purpose of this letter is to document a December 16, 1996 telephone conversation between Mr. Dan Martin (NRC) and Mr. Mark Smith (USEC) regarding the Plan for Achieving Compliance with NRC Regulations at the Paducah Gaseous Diffusion Plants (Compliance Plan) Issue 3, Action 10, dealing with the modifications to allow a pressure decay test to be performed separately for the inner and outer autoclave containment isolation valves.

Issue 3, Action 10 of the Compliance Plan states, in part:

Modifications to allow a pressure decay test to be performed separately for the inner and outer containment valves, and assurance that back pressure does not mask leaks, for all autoclaves in C-333A, C-337A and C-360 will be complete by December 31, 1996.

To satisfy Issue 3, Action 10, USEC intends to perform the modifications on operable autoclaves. Modifications required to accomplish the above Compliance Plan Action for autoclaves that are currently inoperable are being formally tracked and will be completed prior to returning inoperable autoclaves to an operable status.

The Justification for Continued Operation (JCO) of the Compliance Plan associated with Issue 3, Action 10, states that until the capability to perform a pressure decay test separately for the inner and outer containment valves, and assuring that backpressure does not mask leaks, is provided for all autoclaves, the following surveillance tests will be performed: (1) quarterly channel functional tests to verify containment valve closure and (2) quarterly overall autoclave containment pressure decay or leak rate. The JCO concludes that this testing provides justification that the plant can continue to operate safely until the autoclave upgrades are installed as discussed in the Plan of Action and Schedule. With respect to Issue 3, continuing to operate safely as specified in the JCO, has been interpreted to apply to operable autoclaves, since only operable autoclaves would be utilized for cylinder feeding, transfer or sampling activities.

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Therefore, completing the modifications to allow separate testing of the inner and outer containment valves on currently operable autoclaves and formally tracking the modifications to ensure that the modifications are complete prior to returning inoperable autoclaves to an operable status, satisfies that portion of Compliance Plan Issue 3, Action 10 associated with these modifications. As a result, no changes to the Compliance Plan are required.

Should you have any questions or require additional information, please contact me at (301) 564-3413 or Mark Smith at (301) 564-3244.

Sincerely,

S.D. Routh for

Robert L. Woolley
Nuclear Regulatory Assurance and Policy Manager

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