

70-7002



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Enrichment Corporation

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December 23, 1996

Dr. Carl J. Paperiello
Director, Office of Nuclear Material
Safety and Safeguards
Attention: Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

SERIAL: GDP 96-0203

Portsmouth Gaseous Diffusion Plant (PORTS)

Docket No. 70-7002

Certificate Amendment Request-Change to Technical Safety Requirements for Administrative Controls on Overtime

Dear Dr. Paperiello:

In accordance with 10 CFR 76.45, the United States Enrichment Corporation (USEC or Corporation) hereby submits a request for amendment to the certificate of compliance for the Portsmouth, Ohio Gaseous Diffusion Plant (GDP). This certificate amendment request revises TSR 3.2.2 b.2 as specified in Issue 37 of DOE/ORO-2027 Revision 3, Change A, Plan for Achieving Compliance with NRC Regulation at the Portsmouth Gaseous Diffusion Plant (Compliance Plan).

Issue 37 of the Plan for Achieving Compliance with NRC Regulations at the Portsmouth Gaseous Diffusion Plant, requires USEC to supplement current staffing allocations to meet proposed working hour guidelines and to submit a revised TSR to add these guidelines to TSR 3.2.2 b.2. PORTS has provided the resources and management controls necessary to comply with the proposed work hour guidelines. The revised TSR will implement the proposed requirements 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.

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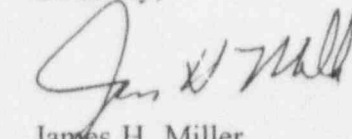
Dr. Carl J. Paperiello
December 23, 1996
GDP 96-0203 Page 2

Enclosure 1 to this letter provides a detailed description and justification for the proposed change. Enclosure 2 contains a copy of the revised TSR page and the associated SAR page revision. Enclosure 3 contains the basis for USEC's determination that the proposed changes associated with this certificate amendment request are not significant.

Since this proposed certificate amendment request is not required to support continued operation, USEC requests NRC review and approval at your earliest convenience. Please order this amendment effective 30 days after NRC approval.

Any questions related to this subject should be directed to Robert L. Woolley at (301) 564-3413 or Mark Smith at (301) 564-3244.

Sincerely,



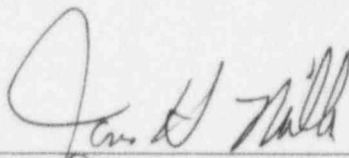
James H. Miller
Vice President, Production

Enclosures: As Stated

cc: NRC Region III Office
NRC Resident Inspector - PGDP
NRC Resident Inspector - PORTS
Mr. J. Dale Jackson (DOE)


OATH AND AFFIRMATION

I, James H. Miller, swear and affirm that I am Vice President, Production, of the United States Enrichment Corporation (USEC), that I am authorized by USEC to sign and file with the Nuclear Regulatory Commission this Certificate Amendment Request for the Portsmouth Gaseous Diffusion Plant, that I am familiar with the contents thereof, and that the statements made and matters set forth therein are true and correct to the best of my knowledge, information, and belief.



James H. Miller

Subscribed to before me on this 23 day of DECEMBER, 1996.



Notary Public

CATHERINE E. KEEL
NOTARY PUBLIC STATE OF MARYLAND
My Commission Expires February 4, 1997

**United States Enrichment Corporation(USEC)
Proposed Certificate Amendment Request
Portsmouth Gaseous Diffusion Plant
Administrative Controls on Overtime
Detailed Description of Change**

The Plan for Achieving Compliance with NRC Regulations at the Portsmouth Gaseous Diffusion Plant (Compliance Plan), Issue 37, requires USEC to supplement current staffing allocations to meet proposed working hour guidelines and to submit a revised TSR to add these guidelines to TSR 3.2.2 b.2. In accordance with this Compliance Plan Issue, the Portsmouth Gaseous Diffusion Plant has provided the resources and management controls necessary to comply with the proposed work hour guidelines.

Existing TSR 3.2.2.b.2 contained within Revision 6 of the Application reads as follows:

An individual should not be permitted to work more than 16 hours in any 24 hour period, nor more than 32 hours in any 48 hour period, nor more than 80 hours in any 7 day period, all excluding shift turnover time.

The revised TSR 3.2.2 b.2 implements the proposed requirements 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 as committed to in the Action Plan for Compliance Plan Issue 37. Revised TSR 3.2.2.b.2 is included in Enclosure 2. In addition, SAR Section 6.5.10.3 has been revised to reflect this change to the working hour guidelines and is also included in Enclosure 2. The implementation of these overtime controls satisfy the Compliance Plan commitment and will enhance safe facility operation by minimizing any adverse effects of excessive work hours.

Enclosure 2
GDP96-0203
4 Pages

Proposed Certificate Amendment Request Portsmouth Gaseous Diffusion Plant Letter GDP96-0203 Removal/Insertion Instructions	
Remove Pages	Insert Pages
VOLUME 2	
Section 6.5 Page 6.5-13/6.5-14	Section 6.5 Page 6.5-13/6.5-14
VOLUME 4	
Section 3.0 Page 3.0-3	Section 3.0 Page 3.0-3

SECTION 3.0 ADMINISTRATIVE CONTROLS

- b. Individuals who perform training, health physics, quality assurance, nuclear criticality safety, and/or other safety functions shall have sufficient organizational freedom to ensure their independence from operating pressures.

3.2.2 FACILITY STAFF

- a. Minimum staffing requirements for each facility are shown in Table 3.2.2-1. These staffing levels do not apply under conditions requiring facility evacuation.
- b. Administrative procedures shall be developed, implemented, and maintained to limit the working hours of facility staff who perform safety functions (e.g., operators, health physics personnel, maintenance personnel), in accordance with the following guidelines.

Adequate shift coverage shall be maintained without routine heavy use of overtime. The objective shall be to have personnel work an 8-hour or 12-hour work day [i.e., a nominal 40 hour (can be as much as 48 hours) work week]. In the event that overtime must be used on a temporary basis, the following guidelines shall be used:

1. An individual should not be permitted to work more than 16 straight hours, excluding shift turnover;
2. An individual should not be permitted to work more than 16 hours in any 24 hour period, nor more than 24 hours in any 48 hour period, nor more than 72 hours in any 7 day period, all excluding shift turnover time;
3. A break of at least 8 hours should be allowed between work periods; the 8 hours may include shift turnover;
4. Except during outage periods, the use of overtime should be considered on an individual basis and not for the entire staff on a shift.

Any deviation from the above guidelines shall be authorized in advance by the General Manager or his designee, in accordance with approved administrative procedures and with documentation of the basis for granting the deviation. Routine deviation from the above guidelines is not authorized.

Management will assess on a monthly basis the application of overtime for facility staff who perform safety functions to ensure consistency with the overtime guidelines stated above.

When all of the above elements have been satisfied, the first-line manager can return the equipment to service.

6.5.10 Items Addressed by Compliance Plan

This section is implemented as described with exception(s) as listed below. The listing of the exception(s) also contains a brief description of what is currently in place at the plant. The Compliance Plan provides a description of the exceptions (noncompliances), a justification for continued operation, a description of the actions to be taken to achieve compliance and the schedule for completion of those actions.

6.5.10.1 Procedure Upgrades

An upgrade of operations procedures is being performed as part of the nuclear safety upgrade program.

6.5.10.2 Training Program Upgrades

Training will be required on upgraded procedures. In addition, training and qualification for some of the positions noted in this section are included in the nuclear safety upgrades for systems approach to training.

6.5.10.3 Overtime

The following overtime guideline, among others, is currently included in the Technical Safety Requirements (TSRs):

An individual should not be permitted to work more than 16 hours in any 24 hour period, nor more than 24 hours in any 48 hour period, nor more than 72 hours in any 7 day period, all excluding shift turnover time;

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**United States Enrichment Corporation (USEC)
Proposed Certificate Amendment Request
Portsmouth Gaseous Diffusion Plant
Administrative Control on Overtime
Significance Determination**

The United States Enrichment Corporation (USEC) has reviewed the proposed changes associated with this certificate amendment request and provides the following Significance Determination for consideration.

1. No Significant Decrease in the Effectiveness of the Plant's Safety, Safeguards or Security Programs

The submittal of the revised TSR 3.2.2 b.2 as stated in the Compliance Plan Issue 37, Plan of Action and Schedule to comply with work hour restrictions is not addressed in plant safety, safeguards or security programs contained in the Application for United States Nuclear Regulatory Commission Certification for the Portsmouth Gaseous Diffusion Plant (PORTS). Therefore, the effectiveness of these programs is unaffected by this change.

2. No Significant Change to Any Conditions to the Certificate of Compliance

None of the Conditions to the Certificate of Compliance for Operation of the Gaseous Diffusion Plants (GDP-2) specifically address work hour restrictions or specific TSR issues. Thus, the proposed SAR and TSR changes have no impact on any of the Conditions to the Certificate of Compliance.

3. No Significant Change to Any Condition of the Approved Compliance Plan

The Plan of Action and Schedule for Issue 37 of the Compliance Plan, requires USEC to supplement current staffing allocations to meet working hour guidelines and to submit a revised TSR to add these guidelines. The proposed TSR change is submitted to satisfy a Compliance Plan commitment and creates no significant change to the Compliance Plan nor to any conditions of the Compliance Plan. The SAR section has also been revised accordingly to reflect the completion of the Compliance Plan action.

4. No Significant Increase in the Probability of Occurrence or Consequences of Previously Evaluated Accidents

The revision of the TSR and the associated SAR Section to implement the more restrictive work hour controls as identified in Compliance Plan Issue 37 will not increase the probability of occurrence or consequences of any postulated accidents currently identified in the SAR. The change will reduce the overall risk associated with these evaluated accidents by minimizing the potential for any adverse effects associated with excessive work hours.

5. No New or Different Type of Accident

The implementation of the more restrictive work hour controls as identified in Issue 37 will not create a new or different type of accident than those previously analyzed. This is due to the fact that the limiting of work hours does not change or add any new accident initiator. Implementation of more restrictive work hour controls reduces the overall risk associated with these evaluated accidents by minimizing the potential for any adverse effects associated with excessive work hours.

6. No Significant Reduction in Margins of Safety

The implementation of more restrictive work hour controls as identified in Issue 37 will not reduce the margin of safety as defined in the Technical Safety Requirements. This change is intended to minimizing the potential for adverse effects associated with excessive work hours.

7. No Significant Decrease in the Effectiveness of any Programs or Plans Contained in the Certificate Application

The implementation of more restrictive work hour controls as identified in Issue 37 will not significantly decrease the effectiveness of any program or plan contained in the Application for United States Nuclear Regulatory Commission Certification for the Portsmouth Gaseous Diffusion Plant. Work hour guidelines are not specifically addressed in any of the Programs or Plans contained within the Certification Application. The change to the work hour guidelines contained with TSR 3.2.2.b.2 is intended to restrict overtime expended so as to minimize adverse affects of excessive overtime. Therefore, this change does not decrease the effectiveness of any programs or plans contained in the Certificate Application.

8. The proposed changes do not result in undue risk to 1) public health and safety, 2) common defense and security, and 3) the environment.

The implementation of more restrictive work hour controls as identified in Issue 37 does not increase the probability or consequence of any previously analyzed accident. Implementation of the more restrictive work control guidelines in accordance with Compliance Plan Issue 37 is intended to restrict overtime expended by facility staff to minimize any adverse effects of excessive overtime. The change will reduce the overall risk associated with these evaluated accidents. In addition, this revision has no direct impact on plant effluents or on the programs and plans in place to implement physical security. Therefore, this change enhances safety and represents no undue risk to the health and safety of the public and workers and poses no undue risk to the environment or the common defense and security.