

76-7001

United States  
Enrichment Corporation

2 Democracy Center  
6903 Rockledge Drive  
Bethesda, MD 20817

Tel: (301) 564-3200  
Fax: (301) 564-3201



United States  
Enrichment Corporation

January 24, 1997

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 97-0007

**Paducah Gaseous Diffusion Plant (PGDP)**  
**Docket No. 70-7001**  
**Technical Safety Requirements Surveillance Criteria for Cascade Cell Trip Function**

Dear Mr. Pierson:

As discussed with Mr. Dan Martin of your staff on January 24, 1997, the purpose of this letter is to inform you of an issue associated with a Technical Safety Requirement (TSR) Surveillance which was identified during our preparation for transition to the Enrichment Cascade at the Paducah Gaseous Diffusion Plant and to identify how USEC resolved this issue. This topic has also been discussed with Mr. Ken O'Brien.

The Enrichment Cascade Facility transitioned to the TSRs associated with these facilities on January 17, 1997 at 1200 hours. As part of this facility transition, USEC implemented TSR 2.4.4.12, Cascade Cell Trip Function. Surveillance Requirement (SR) 2.4.4.12-8 requires the following:

Utilize the ACR "motor stop" button for planned "00" and "000" cell shutdowns and the motor breaker pistol grip at the local cell panel for planned C-310 cell shutdowns

Approximately 90 percent of the cells at PGDP were in operation at the time of cascade facility transition. The remainder of cells were shutdown for various reasons. Most of the shutdown cells were not shutdown using the ACR motor stop button. As such, SR 2.4.4.12 could not be satisfied for these cells.

In addition, the cells in operation at the time of facility transition also may not have been shutdown using the ACR motor stop button at the time of their last cell shutdown since utilization of the ACR motor stop button was not a requirement in the Operational Safety Requirements. Therefore, for those cells operating at the time of transition, the applicability of this SR was also questioned.

USEC utilizes Technical Safety Requirement Clarifications (TSRC) to clarify TSRs which may be ambiguous or unclear. The TSRC process is a proceduralized process which is intended to provide

9702030016 970124  
PDR ADOCK 07007001  
C PDR

intucky Portsmouth, Ohio Washington, DC

Mr. Robert C. Pierson  
January 24, 1997  
GDP97-0007 Page 2

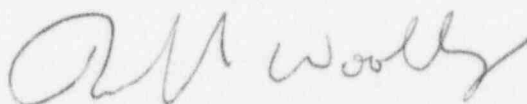
additional guidance on, but not change, the TSRs. USEC performed a TSRC to clarify the applicability of this SR to shutdown and operating cells at the time of cascade transition. The results of this clarification are summarized below.

For the cells shutdown at the time of facility transition, the "00" and "000" cell restart procedures were revised to require testing of the ACR motor stop buttons prior to restart of shutdown cells. For the "00" cells shutdown at the time of facility transition, this testing consists of actuating the ACR push buttons to open the motor breakers thus verifying the ACR trip circuit functions properly. For the "000" cells shutdown at the time of facility operation, the testing consists of actuating the ACR motor stop button to open the 15kV Air Circuit Breaker to verify the cell trip function.

Those cells that were in operation at the time of the cascade facility transition remain in operation. At the next planned cell shutdown, the requirements of SR 2.4.4.12-8 will apply and the ACR motor stop button will be utilized to effect cell shutdown.

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

Sincerely,



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