70-1113

GE Nuclear Energy

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February 5, 1997

Mr. M. F. Weber, Licensing Branch, NMSS
U.S. Nuclear Regulatory Commission
Mail Stop T 8-D-14
Washington, DC 20555-0001

Subject: License Renewal - Response to Request for Additional Information (TAC No. L10079)

Reference:
(1) NRC License SNM-1097, Docket 70-1113
(2) License Renewal Application, 4/5/96
(3) Submittal, RJ Reda to ED Flack, 5/6/96
(4) Submittal, RJ Reda to RC Pierson, 5/14/96
(5) Letter, RC Pierson to RJ Reda, 7/18/96
(6) Submittal, RJ Reda to RC Pierson, 8/30/96
(7) Submittal, RJ Reda to ED Flack, 9/26/96
(8) Letter, MA Lamastra to RJ Reda, 10/2/96
(9) Submittal, RJ Reda to MA Lamastra, 11/22/96
(10) Application, RJ Reda to MF Weber, 12/16/96
(11) Letter, MA Lamastra to RJ Reda, 12/17/96

Dear Mr. Weber:

GE's Nuclear Energy Production (NEP) facility in Wilmington, N.C., hereby transmits the enclosed information in response to your above request dated 12/17/96. This information is being provided in support of our license renewal request.

Attachment 1 contains our response to specific comments and request for additional information required in the 12/17/97 letter from Mr. Lamastra. The information being requested is italicized and our response is in regular bold print. This attachment also explains the license renewal page changes by section.

Attachment 2 contains the page changes to our license renewal application for pages contained in the Table of Contents, Chapter 2 and Chapter 3. We are also updating Chapter 4, Tables 4.1 and 4.2, to contain the latest information that our team is making in their ISA procedures. Each chapter is provided in its entirety for easy replacement. Each page within the chapter that

the right hand column with a horizontal line (|) to indicate where a change has taken place. All replacement pages contain the date of this submittal and are shown as revision zero.

Six copies of this submittal are being provided for your use.

Please contact Charlie Vaughan on (910) 675-5656 or me on (910) 675-5889, if you have any questions or would like to discuss this matter further.

Sincerely,

GE NUCLEAR ENERGY

Ralph J. Reda, Manager
Fuels & Facility Licensing

/zb
Attachments

cc: RJR-97-005

ATTACHMENT 1

Response to NRC Letter Dated December 17, 1996
Specific Comments and Additional Information Required
GE-Wilmington Renewal Application

RESPONSE TO NRC LETTER DATED DECEMBER 17, 1996
SPECIFIC COMMENTS AND ADDITIONAL INFORMATION REQUIRED
GE-WILMINGTON RENEWAL APPLICATION

CHAPTER 1 GENERAL INFORMATION

1. *Page 1.10, Section 1.3.1.2. This section should be expanded to include a commitment that accident scenarios are developed when any changes to the process are planned/implemented that may impact a structure, system or component important to safety, even if [it] does not involve a new technology.*

   GE concurs with the thought here that accident scenarios should be developed and evaluated under these conditions. This commitment is included as a part of the Integrated Safety Program (Chapter 4) and is specifically detailed in Section 4.10.

   The suggested changes to Section 1.3.1.2 are not appropriate in this case as this section is detailing situations which require review and approval by the NRC and is intended to supplement the regulatory requirements with facility specific information.

2. *Section 1.3.3, page(s) 1.11 - 1.13. Describe uses intended for this material and provide the following:*

   a) *Information regarding amount(s) and concentration(s) of hydrofluoric acid transferred, if varied, because of generation of the acid depends on production, then provide the range.*

   b) *A pathway analysis that shows that this material does not enter any commodity designated for ingestion or inhalation nor is it released to the environment. Include secondary pathway analysis of residues.*

   c) *A description of the shipping containers, such as size, material, liners, etc.*

   d) *A commitment to keep records for sampling and measurement of uranium concentrations prior to shipment.*

   e) *GE has been transferring nitrate-bearing liquids and CaF_2 to buyers in the paper and steel manufacturing business. However very .ittle information is provide[d] for these activities in the renewal application. Therefore, the same information*

requested above for the hydrofluoric acid should be provided for these materials as well.

Hydrofluoric Acid

a) **Quantity and Concentration: The HF generation is dependent upon the operation of the UF_6 conversion process. For the primary HF product stream we expect the HF product to have a nominal HF concentration of 50% and be produced at the rate of 100,000 - 250,000 gallons per year. To meet customer demands the acid may be diluted to concentrations somewhat below 50% (probably not below 30%). The process also produces HF at a nominal concentration of 5% in quantities from 50,000 - 125,000 gallons per year. The majority of the time this will be treated and disposed of. However, some customers have expressed an interest in some of this material and also it could be used to blend with the 50% to make a slightly lower concentration in instances where our customer desires a lower concentration.**

b) **Pathway Analysis: The current GE License renewal requires that the concentration of uranium be less than 3 ppm (typically it is less than 1 ppm) for us to sell the HF product for commercial use. This concentration of uranium is not different from the range of concentrations of naturally occurring uranium in soils and other materials. In addition, naturally occurring uranium is more radioactive than 3 ppm of low enriched uranium because of the abundance of associated daughter activities. Higher concentrations of natural radioactivity and uranium occur in phosphate-bearing ores. The commercially available phosphoric acid from these ores contains uranium in concentrations significantly higher than 3 ppm, and fertilizers in widespread use contain uranium in amounts up to 100 ppm.**

The hydrofluoric acid will be used for etching titanium in the specialty metals industry. Thus, the hydrofluoric acid is transferred and used in such a manner that the minute or trace quantity of uranium does not enter into any food, beverage, cosmetic, drug or other commodity designated for ingestion or inhalation by, or application to, a human being such that the uranium concentration in these items would exceed that which naturally exists. Additionally, the acid is used in a process that will not release the low levels of radioactivity to the atmosphere as airborne material and whose residues will remain in a wastewater or other treatment system.

The HF itself is overwhelmingly more toxic than the trace amounts of uranium present. The precautions required for using HF alone will almost guarantee that none of the uranium (present in only trace amounts to begin

with) will enter humans directly from ingestion or inhalation or enter the food chain. If the uranium should be separated from the HF solution and move through the environment, it will almost necessarily involve dilutions of the initial concentration by orders of magnitude.

Furthermore, bioaccumulation factors for uranium in crops, milk, eggs, beef, and poultry range from 3×10^{-1} to 6×10^{-4}. Bioaccumulation factors for uranium in soft parts of crustaceans and mollusks may be as high as a factor of 10, but this is more than offset by the fact that uranium does not always concentrate in the edible parts and fish or seafood constitute only just over 1% of the dietary intake in the USA.

Thus, in conclusion, the activities and end use of the material will be limited to those that do not allow chemical separation of the uranium or entry of the product into the food chain. Furthermore, in the highly improbable event it does, its impact will be insignificant. Secondary pathways are insignificant and are not evaluated.

c) **Shipping: The HF will be shipped in chemical tank trailers (chlorobutyl rubber lined) of nominally 5,000 gallon capacity. These trailers will be constructed for the shipment of HF and the shipments will be made in accord with the Department of Transportation (DOT) regulations governing this type chemical material.**

d) **Measurements and Records: The uranium concentration will be measured before the shipments are made to verify that the conditions of the license are met. Records will be maintained to show the uranium concentration in the shipment.**

<u>Nitrate Bearing Liquid</u>

a) **Quantity and Concentration: Both the quantity and the concentration depend upon the operation of the uranium processing operations and the environmental conditions such as temperature and rainfall. The nitrate concentration ranges up to 60,000 ppm as NO_3 and up to 5,000 ppm as NH_3. The volumes vary between 3 and 15 million gallons per year.**

b) **Pathway Analysis: The current GE License renewal application requires that the concentration of uranium be less than 5 ppm (typically it is less than 1 ppm) for us to transfer the nitrate-bearing liquids to International Paper (formerly Federal Paper Board Corporation) in Riegelwood, North Carolina for a beneficial commercial use. This concentration of uranium in these**

nitrate-bearing liquids is not different from the range of concentrations of naturally occurring uranium in soils and other materials. In addition, naturally occurring uranium is more radioactive than 5 ppm of low enriched uranium because of the abundance of associated daughter activities. Even higher concentrations of uranium are found in phosphate-bearing ores. The commercially available phosphoric acid from these ores contains uranium in concentrations significantly higher than 5 ppm and fertilizers (also from these ores) in widespread use contain uranium in amounts up to 100 ppm.

The nitrates from the nitrate-bearing liquids are used to feed the bacteria that destroy the waste from the paper-producing process at International Paper. Thus, the nitrates are transferred and used in such a manner that the minute or trace quantity of uranium does not enter into any food, beverage, cosmetic, drug or other commodity designated for ingestion or inhalation by, or application to, a human being such that the uranium concentration in these items would exceed that which naturally exists. The nitrates are transferred as a liquid and are used in a liquid process. Thus, even low levels of radioactivity would not be released to the atmosphere as airborne material. Additionally, the residues will remain in a wastewater or other treatment system and are periodically monitored by GE. If the uranium should be separated from the nitrate-bearing solution and move through the environment, it will almost necessarily involve dilution of the initial concentration by orders of magnitude.

Furthermore, bioaccumulation factors for uranium in crops, milk, eggs, beef, and poultry range from 3×10^{-1} to 6×10^{-4}. Bioaccumulation factors for uranium in soft parts of crustaceans and mollusks may be as high as a factor of 10, but this is more than offset by the fact that uranium does not always concentrate in the edible portions and fish or seafood constitute only just over 1% of the dietary intake in the USA.

Thus, in conclusion, the activities and end use of the material will be limited to those that do not allow chemical separation of the uranium or entry of the product into the food chain. Furthermore, in the highly improbable event it does, its impact will be insignificant.

c) Shipment: Shipment is made in chemical tank trucks which meet all applicable Department of Transportation regulations for liquid chemicals. The tanks are nominally 5,000 gallon capacity.

d) Measurement and Records: The liquids are sampled and measured before shipment and verified to conform with the license limits. Records for these

shipments are retained. Further, the lagoon system at International Paper is monitored in accord with our environmental monitoring program.

Calcium Fluoride and Calcium Sulfate

a) **Quantity and Concentration: The calcium fluoride produced is relatively pure and typically stoichmetric, however, there is up to a 50% excess of lime in the mixture. The quantities shipped vary but nominally range from 500,000 - 5,000,000 pounds per year.**

The calcium sulfate produced is relatively pure and typically stoichmetric. The quantities shipped vary but nominally range from 500,000 - 700,000 pounds per year.

b) **Pathway Analysis:**

Reference 1 (see page 15 of this attachment): "Dose Assessment For Disposal Of Contaminated Calcium Sulfate In The GSX Hazardous Waste Landfill, Pinewood, South Carolina", Division of Low-Level Waste Management and Decommissioning, U. S. Nuclear Regulatory Commission, August 3, 1992.

Reference 2 (see page 15 of this attachment): A cover memorandum for the document referenced above, dated August 4, 1992. This memorandum was from John H. Austin, Chief Decommissioning and Regulatory Issues Branch (Division of Industrial and Medical Nuclear Safety, IMNS) for John Hickey, Chief Fuel Cycle Safety Branch (Division of Low-Level Waste Management and Decommissioning, NMSS).

It is concluded that the estimated maximum dose to an off-site resident at the Pinewood facility from trace amounts of uranium in either CaF_2 or $CaSO_4$ are conservatively estimated to be in the range of 1-2 mrem. This dose estimate is below any existing regulatory limit and is sufficiently low to ensure protection of the public health and safety. It should be noted that a more realistic approach would be expected to yield much lower doses. This dose assessment is based on a careful consideration of the above referenced documents and other information. Details of the assessment are given below.

The above referenced memorandum (reference 2) concludes that the annual dose to an off-site resident at the Pinewood, SC facility via the groundwater pathway is conservatively estimated to be less than 1 mrem per year. This is based on a dose assessment performed by the U.S. NRC's Division of Low-Level Waste Management and Decommissioning (Reference 1 above). The

RESRAD computer code (version 4.1), which was developed by Argonne National Laboratory, was used to estimate the maximum annual dose via the groundwater pathway which could be received by a member of the general public. The uranium was considered to be 4% enriched in U^{235} for this assessment. While GE is currently approved to process up to 5% enriched uranium, this will not significantly raise the dose estimate (approximately 20%) given above to ~ 1.2 mrem. Furthermore, the typical enrichment currently processed is ~ 3.5%.

The above referenced dose assessment (Reference 1) states that the estimated dose via other pathways such as direct radiation, ingestion of soils and foods or inhalation of dusts as bounded by the technical basis for the 1981 BPT (for example, approximately 20 mrem EDE from inhalation of optimally respirable insoluble high enriched uranium).

The solubility class of the dominant or matrix compound (CaF_2 or $CaSO_4$ instead of uranium) under consideration will often determine the appropriate solubility class. This is especially true for the inhalation pathway to the blood, because the matrix material must be solubilized in the lung prior to clearance of both the calcium compound and the uranium. The U. S. NRC's 10CFR20, Appendix B considers all compounds of calcium to be class W. Thus, the dose assessment for trace amounts of uranium in $CaSO_4$ should apply equally well to trace amounts of uranium in CaF_2. The inhalation ALI (annual limit on intake) for class W uranium is more than 17 times greater than that for the insoluble, class Y uranium considered above when an EDE of 20 mrem was obtained. Furthermore, high enriched uranium was assumed for the dose assessment and high enriched uranium (20 to 90+%) has a specific activity that is at least 4 to 27 times greater than the nominal 5% enriched present in this case. Adjusting the parameters for the assessment just cited from assuming class Y uranium to class W uranium and from high enriched uranium to 5% enriched uranium, the dose EDE from the above referenced dose assessment of 20 mrem will be lowered by at least a factor of 68 to ~ 0.3 mrem.

Bioaccumulation factors for uranium in crops, milk, eggs, beef, and poultry range from 3×10^{-1} to 6×10^{-4}. Bioaccumulation factors for uranium in fish, crustaceans and mollusks may be as high as a factor of 10, but this is offset by the fact that uranium does not concentrate in the edible parts of some fish and fish or seafood constitute only just over 1% of the dietary intake in the USA.

A secondary pathway analysis for residues is not applicable to burial at Pinewood.

c) **Shipment: The Calcium Fluoride is shipped in covered 22 and 24 foot bulk chemical handling dump trailers.**

The Calcium Sulfate is packaged in "supersacks" on pallets and carried by tractor trailer truck. Transportation is in accord with applicable Department of Transportation regulations.

d) **Measurements and Records: The material is sampled and measured before shipment to verify that the uranium concentrations are below the license limits. Records of these shipments are maintained.**

CHAPTER 2 ORGANIZATION AND ADMINISTRATION

1. *General comment - overall, most positions have the qualifications (especially experience) decreased from the existing license. You should demonstrate or explain why such a decrease in the over-all experience of the staff does not adversely [effect] the safety of operations.*

GE management is responsible and accountable for the safe operation of the plant, compliance with the regulations and the conditions of the license. One key element in effectively implementing this responsibility is that of having proper resources in place to ensure that this is the case. Properly qualified and trained people in all job functions (including those key positions critical to safety) is one of those responsibilities of management at GE.

GE has in place a management system for identifying job functions, the responsibilities for these functions, minimum requirements for the jobs and a review process to ensure that the candidates meet the minimum requirements, are capable of executing the job responsibilities and represent the best candidate available for the position. The program is implemented by functional management of the facility and is overseen by the personnel relations function of the company which is independent from the functional components.

The requirements stated in the renewal application are minimum requirements for the positions. This means that this is the lowest level of qualification where GE management might look for and evaluate candidates for these jobs. Filling the jobs is subjected to the management process defined above and facility management is responsible and accountable for employee performance.

GE believes, therefore, that the referenced changes in position qualifications does not in any way decrease the effectiveness of the safety program. The reason being is that the effectiveness of the safety program in this area is a direct function of the management process as defined above and not specifically on a set of requirements listed in the license.

GE also believes that the requirements proposed in the renewal license are generally consistent with similar requirements at other like facilities in our industry and for that reason too represent rational minimum levels of qualification.

2. *Page 2.10, Section 2.3.1. Make the following commitments:*

   a) *The facility Safety Review Committee (SRC) shall include experts on operations and all safety disciplines (criticality, radiological, chemical and fire). The members and alternate members of the SRC shall have an academic degree in an engineering or physical science field and shall be appointed by the Facility Manager.*

   b) *The SRC shall have review meetings within 60 days after an incident which is reportable to the NRC. These meetings may be combined with regular meetings.*

   c) *Following the reportable event, the Committee shall review the incident causes, responses and both specific and generic corrective actions to ensure that resolution of the problem is implemented.*

   d) *A written report of each SRC meeting and review shall be forwarded to the facility manager and appropriate function manager(s) within 30 days and be retained for the duration of the facility.*

The Branch Technical Position on management controls/quality assurance for fuel cycle facilities discusses "plant safety committees". In the case of review and approval of operating plans and procedures, design changes, non-conformances and corrective actions (which currently includes unusual incident identification, reporting, investigation and correction), audits and training programs, the Branch Technical Position gives an option for these items. It indicates that these responsibilities should be assigned to committee(s) or an equivalent function. At the Wilmington site these responsibilities have bees assigned functionally. GE uses the term 'operationalized' which means that these elements have been assigned in the mainstream of operations and are handled by those functional

groups best suited to handle this work. This management structure and the assignments are described in sections 2.1 - 2.2 of this license.

The Branch Technical Position goes on to indicate that there should be a committee(s) that operate under established procedures for systematic review of proposed changes to procedures, equipment, tests or processes to determine that such changes can be made by license or whether NRC approval is required. At Wilmington, the Wilmington Safety Review Committee (WSRC) is established as the primary committee to oversee this. The total scope of the committee is described in section 2.3.1. We also operate with a Radiation Safety Committee (Section 2.3.2)

GE believes that the management model represented in Chapter 2 fully addressees the regulatory requirements. Our organization simply makes more use of the functional organizations to do this and GE firmly believes this results in much stronger and clearer ownership for the responsibilities. The committees then provide oversight, counsel and support to the safety program, forming a second layer of management assurance that the plant operates safely and in conformance with the regulatory requirements.

Since the WSRC is not the primary responsible group for looking at incidents and determining root cause and corrective action, the timing suggested for 2.b is not necessary. This is covered in the internal procedures that govern these responsibilities and operating practices.

The WSRC and the Radiation Safety Committee are both constituted and operated to internal procedures which establish their operations including the requirements for written records and the retention of appropriate records.

3. *Define "area" and identify how many areas there are in the operations.*

Area - A specifically identified location, within the GE - Wilmington Facility, assigned to an Area Manager who is responsible for all activities conducted therein. Activities within an area, which may involve the use of radioactive materials, are typically functionally related.

Currently (January 1997), there are approximately 135 areas at the GE - Wilmington Facility under the supervision of 21 Area Managers. Typically areas are grouped under one Area Manager because of similar functional activities. The majority of the these areas (125+) are within the Controlled Access Area. The other areas across the facility, may contain non-SNM

radiation sources, X-ray machines or SNM under specifically controlled conditions.

4. *Provide more detail of the chain-of-command between "product line management" and "area manager". Explain if one or more product line manager is responsible for one or more area manager(s). In addition to providing more detail in these functions, use diagrams as appropriate.*

The chain-of-command between product line management and area manager is as follows:

All Area Managers must be appointed by the Facility Manager. An Area Manager may be a Staff Level Manager, including those designated as Product Line Management, reporting directly to the Facility Manager. However, an Area Manager may be another qualified individual who reports directly or indirectly to a Staff Level Manager, including those designated as Product Line Management.

Figure 2.1 has been modified to indicate this designation.

CHAPTER 3 CONDUCT OF OPERATIONS

1. *General*

   a) *Include description how they meet the Branch Technical Positions for Management Controls and Operations QA*

   GE has reviewed the Branch Technical Position On Management Controls/Quality Assurance For Fuel Cycle Facilities as published March 21, 1989, and believes that the operations of the Wilmington facility are consistent with or exceed that level of expectation. The license document clearly covers the elements as follows:

   A. Organization: The organizational structure for the operation of the plant, including all aspects of safety are defined in Chapter 2 of the license.

   B. Plant Safety Committee(s): The responsibilities associated with safety committee(s) as defined in the branch technical position are assigned either functionally in Chapter 2 as mentioned in the branch technical position document or assigned in the two safety committees described in

Chapter 2 (Section 2.3).

C. Plant Procedures: The procedural system is described in Chapter 3 (Section 3.9) and includes the elements identified in the branch technical position.

D. Tests and Inspections: Tests and inspections are discussed in Chapter 3 (Section 3.2 - Maintenance) and covers the guidelines of the branch technical position.

E. Audits: The audit and assessments program is covered in Chapter 3 (Section 3.6) and includes the scope of the branch technical position.

F. Training: Training and Qualifications is discussed in Chapter 3 (Section 3.4) and includes the guidelines in the branch technical position.

In addition to these guidelines, GE has included Chapter 4 which discusses the basis of the site's Integrated Safety program that is applied to all nuclear operations on site and embraces the elements discussed in the branch technical position. Configuration Management and Quality Assurance for Safety Systems is also addressed in Chapter 3.

In Section 3.1, you use the terms "important to safety" and "safety-related systems and components" but neither term is defined. Section 3.3.2 uses a different term "Safety Structures, Systems and Components" which may or may not be the same as "Safety Related" or "important to safety".

GE concurs there was some inconsistency throughout Chapter 3 in regard to this terminology. Beginning in Section 3.1 the term "Safety Controls" has been defined to include systems, structures, components and procedures which prevent or mitigate risk of accident. The Chapter text has also been changed to be consistent in this language.

3.1.4 Clarify if Functional Test Instructions (FTIs) are included in Document Control.

Yes, they are included and Section 3.1.4 has been modified to make this more clear.

3.2.1 Clarify if Scheduled Preventive Maintenance applies to instruments or equipment designated as "Active Engineered Controls" are included.

Section 3.2.1 makes this clear. It is also important to note that the output of the ISA process as described in Chapter 4 has a direct bearing on the specific system by system requirements.

3.2.2 Same comment as 3.2.1.

Section 3.2.2 makes this clear. It is also important to note that the output of the ISA process as described in Chapter 4 has a direct bearing on the specific system by system requirements.

3.4 Clarify if training meets requirements of 10 CFR 19.12 for employees. Define how the training meets ANSI 8.20 for nuclear criticality safety training.

We have modified Section 3.4 to include the direct reference to 10 CFR 19.12 and our training meets the requirements.

With regard to criticality safety training, we have also modified the section to include a commitment that this training follows the general outline of ANSI 8.20 so as to be in general conformance with the standard even though the document is not followed verbatim.

3.4.2 Clarify what sort of refresher training or training follows changes will be provided to operators.

We have revised Section 3.4.2 to include this information.

3.6.3 Specify a minimum frequency for independent audits.

In the 8/30/96 revision of pages to the renewal license, the frequency was specified and is biennially (once every two years).

3.7 Clarify how the requirements of NRC Bulletin 90-01 are incorporated into Incident Investigations.

They are included. To make it more clear we have changed "regulations" to "regulatory requirements".

3.9.2 Include a generic statement about the licensee's policy concerning mandatory compliance with the requirements of procedures.

We are modifying the last sentence in the first paragraph to clear up this point. Following the word..."requirements" add "of the procedures and that conformance is mandatory."

Also, specify a minimum frequency for periodic review of operational procedures if they are not changed.

We have modified Section 3.9.3 to include a 3 year minimum review cycle for Operational Procedures (OP's).

2. *Page 3.6, Section 3.4. Add the following: (a) training in 10 CFR Part 19; (b) environmental protection and; (c) risks involved in receiving chronic low level exposure to soluble uranium compounds and byproducts of reaction with ambient moisture, as well as other chemicals involved in processes under the NRC regulatory confines.*

   GE has added the reference to 10 CFR Part 19 to make the section complete.

3. *Page 3.8, Section 3.6.1.*

   a) *QA personnel should be included in the safety audits.*

   GE has a formal internal regulatory compliance audit program that is implemented by Nuclear Safety, Industrial Safety and Environmental Protection personnel. The auditors from these groups are certified by management and are organizationally independent from the audited operations. Findings and concerns resulting from these audits are documented in reports which are distributed to appropriate management and to the audited functions. Persons responsible for corrective actions are identified, and they provide a commitment date for each committed action. Significant committed actions are entered into a computer-based tracking system where they remain until they are closed by a responsible individual and the closure accepted by Environment, Health and Safety personnel. Monthly reports are issued which show the status of committed actions and highlight actions if they are overdue for completion.

   In addition, a Compliance Auditing function within Environment, Health and Safety conducts safety related audits which focus on the continuous improvement of the operations audited. These audits are documented in reports, and individual committed actions are tracked by the lead auditor. The status of these audits is included in the computer-based tracking system mentioned above.

Further, GE contracts for biennial safety audits conducted by external experts. These contracted audits are discussed elsewhere.

These audits are administrated by the EHS function which is independent of the Facility Manager. Therefore, there would be no useful purpose met by requiring QA to be included on the audits.

b) *Audited organization will inform auditing organization of schedule for completion of corrective actions. Notification should be given within 30 days of the audit and tracked to completion by individual designated by the QA group.*

The audit programs described are implemented through three key procedures. The procedures clearly define the audits including all scheduling and timing of actions. These procedures also require tracking and monitoring of the closure of corrective actions.

4. *Page 3.9, Section 3.6.3, first paragraph.*

GE is involved in activities handling radioactive material in chemical processes. Independent audits must be conducted for areas covered under the ISA. The applicant's limitation of the independent audits to only two areas, the radiation and criticality safety programs, severely hinders the purpose of audits and ignores activities significant to plant safety.

This is a correct observation. GE has modified Section 3.6.3 to correct this error.

5. *Page 3.11, Section 3.8, second paragraph.*

If a list of records is to be provided, it should specifically identify retention periods and it should be a more comprehensive listing than provided in the application.

GE agrees that there is a mixed level of detail and the section has been modified to include the retention times and a consistent level of call out of the records required by the regulation for this facility.

PATHWAY ANALYSIS: CaF_2 and $Ca(SO_4)_2$

Attached are the documents referred to as Reference 1 and Reference 2 on page 5 of Attachment 1 of this letter. These documents provide additional information to GE's response for NRC Item 2 - Section 1.3.3, page(s) 1.11 - 1.13 on page 1 of Attachment 1 of this letter.