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November 4, 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 96-0192

Portsmouth Gaseous Diffusion Plant (PORTS)

Docket No. 70-7002

Certificate Amendment Request-Changes to Compliance Plan Due Dates for HEU Related Issue

INFORMATION TRANSMITTED HERewith IS PROTECTED FROM
PUBLIC DISCLOSURE AS CONFIDENTIAL COMMERCIAL OR
FINANCIAL INFORMATION AND/OR TRADE SECRETS PURSUANT TO
10 CFR 2.790(d)(1) AND 9.17(a)(4)

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 proposed certificate of compliance for the Portsmouth, Ohio Gaseous Diffusion Plant (GDP). This certificate amendment request revises the completion date specified in the DOE/ORO-2027, Plan for Achieving Compliance with NRC Regulation at the Portsmouth Gaseous Diffusion Plant, for removal of Highly Enriched Uranium (HEU) not associated with suspension and refeed programs from all leased areas. Specifically, USEC is requesting this date be revised from November 15, 1996, to February 28, 1997. As described in USEC letter GDP 96-0163, certain portions of the Compliance Plan for the Portsmouth plant contain confidential commercial or financial information or trade secrets that are exempt from public disclosure pursuant to Section 1314 of the Atomic Energy Act of 1954, as amended, and 10 CFR 2.790 and 9.17(a)(4).

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Offices in Paducah, Kentucky Portsmouth, Ohio Washington, DC

Dr. Carl J. Paperiello
November 4, 1996
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Issue A.4 of the Plan For Achieving Compliance with NRC Regulations for the Portsmouth Gaseous Diffusion Plant, requires, in part, that HEU not associated with the suspension and refeed programs be either removed (except for a de minimis total quantity across all leased areas not to exceed 999 grams of ^{235}U) from all leased areas or blended to Low Enriched Uranium (LEU), by November 15, 1996. Removal of HEU from X-326 and X-705 (i.e., HEU associated with suspension and refeed programs) is addressed by separate action items in A.4. As part of the implementation support for the Russian Transparency Program (Memo of Understanding with Lockheed Martin Energy Systems), PORTS is to provide special HEU UF_6 standards for the U.S. Department of Energy (DOE). These standards will be used by U.S. monitors in Russia as part of a blind sampling program.

The HEU will come from existing DOE standards material in 2S cylinders currently stored in the X-345 Building. The standards, once prepared in the X-710 Building (a leased building), are to be shipped to Russia in Russian provided sample cylinders. This work has been delayed awaiting arrival of the sample cylinders from Russia. As it currently stands this work cannot be completed prior to the aforementioned November 15, 1996 deadline. A contingency plan has been developed which would require the HEU now in 2S sample cylinders to be transferred into smaller Hoke tubes within the X-710 Building. Once the Russian Sample cylinders are received the smaller Hoke tubes would be transferred into the Russian cylinders at a rate that would not exceed the Plant's permitted HEU quantity (i.e. category III limits) in leased facilities. The success of this contingency plan is based on transferring the material in the 2S sample cylinders into the Hoke tubes. An extension for completion of this Issue A.4 action item is requested from November 15, 1996, to February 28, 1997. PORTS will continue to operate under the commitments and conditions identified in the Compliance Plan Issue A.4 Justification For Continued Operation section. HEU limits in the affected leased areas, specifically the X-710 Building, will be met prior to transition to NRC Regulatory Oversight.

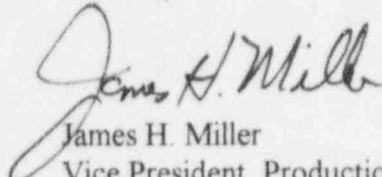
Enclosure 1 to this letter provides a detailed description and justification for the proposed change. Enclosure 2 provides a copy of the new page for Compliance Plan Issue A.4. Enclosure 3 contains the basis for USEC's determination that the proposed change associated with this certificate amendment request is not significant. Since this proposed certificate amendment request involves near term commitment dates only and not changes to programs or the facility as described in the Certification Application, USEC requests NRC review and approval at your earliest convenience. The amendment should become effective immediately upon issuance.

In accordance with 10 CFR 76.33(e) and consistent with the NRC's December 11, 1995 letter, the enclosed Compliance Plan issue is considered to be proprietary commercial and financial information pursuant to 10 CFR 2.790(d)(1) and 9.17(a)(4) and is exempt from public disclosure. This Compliance Plan issue has been clearly identified as proprietary information.

Dr. Carl J. Paperiello
November 4, 1996
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Any questions related to this subject should be directed to Mr. Russell D. Wells at (301) 564-3413.

Sincerely,

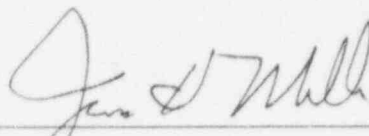

James H. Miller
Vice President, Production

Enclosures: As Stated

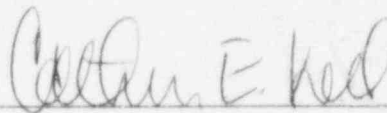
cc: NRC Region III Office
NRC Resident Inspector - PGDP
NRC Resident Inspector - PORTS
Mr. J. Dale Jackson (DOE)

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 5 day of NOVEMBER, 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
Plan for Achieving Compliance with NRC Regulations at the
Portsmouth Gaseous Diffusion Plant
[Compliance Plan] Issue A.4
Detailed Description of Change**

This change extends the completion date committed to in 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.

As part of the implementation support for the Russian Transparency Program (Memo of Understanding with Lockheed Martin Energy Systems), PORTS is to provide special HEU UF_6 standards for DOE. These standards will be used by U.S. monitors in Russia as part of a blind sampling program. The HEU will come from existing DOE standards material in 2S cylinders currently stored in the X-345 Building. The standards once prepared are to be shipped to Russia in Russian provided sample cylinders. This work has been delayed awaiting arrival of the sample cylinders from Russia. As it currently stands this work cannot be completed prior to November 15, 1996 which is the effective date of the requirement established in Compliance Plan Issue A.4 that limits the amount of ^{235}U in leased facilities. A contingency plan has been developed which would require the HEU now in 2S sample cylinders to be transferred into smaller Hoke tubes within the X-710 Building (a leased facility). Once the Russian Sample cylinders are received the smaller Hoke tubes would be transferred into the Russian cylinders at a rate that would not exceed the Plant's permitted HEU quantity (ie. category III limits) in leased facilities (X-710). The success of this contingency plan is based on transferring the material in the 2S sample cylinders into the Hoke tubes. It has been determined that the necessary ^{235}U transfers into Hoke tubes can be performed prior to February 28, 1997.

PORTS will continue to operate under the commitments and conditions identified in the Compliance Plan Issue A.4 Justification For Continued Operation section. HEU limits in the affected leased areas, specifically the X-710 Building will be met prior to transition to NRC Regulatory Oversight.

Proposed Certificate Amendment Request Portsmouth Gaseous Diffusion Plant Letter GDP96-0192 Removal/Insertion Instructions	
Remove Pages	Insert Pages
COMPLIANCE PLAN DOE/ORO-2027/R3 CHANGE A, APPENDIX	
Issue A.4 Pages 7/8	Issue A.4 Pages 7/8

**United States Enrichment Corporation (USEC)
Proposed Certificate Amendment Request
Plan for Achieving Compliance with NRC Regulations at the
Portsmouth Gaseous Diffusion Plant
[Compliance Plan] Issue A.4
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 completion date for the Compliance Plan Issue A.4 (first action item) 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. Therefore, the effectiveness of these programs remains in affect. Additionally, the extension of the completion date still falls before transition to Regulatory Oversight which is when these programs are required to be in place.

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

None of the Conditions to the Proposed Certificate of Compliance for Operation of Gaseous Diffusion Plants (GDP-2) specifically address the due dates for Compliance Plan Issues. Thus, the proposed due date changes have no impact on any of the Conditions to the Proposed Certificate of Compliance.

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

The approximate due date increase of three months for Compliance Plan Issue A.4 (first action item) will not significantly affect the Compliance Plan conditions. PORTS will continue to operate under the commitments identified in the Compliance Plan Justification For Continued Operation section. In essence, PORTS shall operate the plant (X-710) safely by continuing to utilize existing procedures and nuclear criticality safety controls and specifications previously developed for the purpose of handling HEU.

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

PORTS has historically been authorized to possess materials that are of "high strategic significance" and has safely managed the inventory of uranium quantities and enrichments greater than those of "low strategic significance". Accident scenarios involving HEU were evaluated during the evolution of the 1985 Safety Analysis Report and Operational Safety Requirements. The extension of the time for the continued handling of HEU in excess of the 999 gram limit within the X-710 Facility will not increase the probability of occurrence or consequences of the postulate criticality accidents currently identified in the SAR.

5. No New or Different Type of Accident

PORTS has historically been authorized to possess materials that are of "high strategic significance" and has safely managed the inventory of uranium quantities and enrichments greater than those of "low strategic significance". Accident scenarios involving HEU were evaluated during the evolution of the 1985 Safety Analysis Report and Operational Safety Requirements. The extension of time for the continued handling of ^{235}U in excess of the 999 gram limit within the X-710 Facility will not create any new or different type of accident.

6. No Significant Reduction in Margins of Safety

PORTS has historically been authorized to possess materials that are of "high strategic significance" and has safely managed the inventory of uranium quantities and enrichments greater than those of "low strategic significance". Accident scenarios involving HEU were evaluated during the evolution of the 1985 Safety Analysis Report and Operational Safety Requirements. The extension of time for the continued handling of ^{235}U in excess of the 999 gram limit within the X-710 Facility will not reduce the margin of safety as defined in the Technical Safety Requirements document.

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

The completion date for the Compliance Plan Issue A.4 (first action item) is not addressed in any programs or plans contained in the Application for United States Nuclear Regulatory Commission Certification for the Portsmouth Gaseous Diffusion Plant. Therefore, the effectiveness of these programs remains in affect. Given that the programs described in the Application are not required to be implemented until Transition to NRC Regulatory Oversight and the fact that these Compliance Plan activities will be completed by this date, there is no impact on the effectiveness of these programs or plans.

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 extension of the time for the continued handling of ^{235}U in excess of the 999 gram limit within the X-710 Facility does not increase the probability or consequence of any potential criticality accident. Postulated criticality or UF_6 releases (2 to 3 Kgs) accidents at the PORTS plant do not impact the general public and only have minimum potential to adversely affect the health and safety of the local work force. As such, this change does not represent an undue risk to public health and safety. In addition, this revision has no impact on plant effluents or on the programs and plans in place to implement physical security.