

70-7002

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February 14, 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 97-0015

**Portsmouth Gaseous Diffusion Plant (PORTS)
Docket No. 70-7002
Criticality Accident Alarm System (CAAS) for Nearby Buildings**

Dear Mr. Pierson:

The purpose of this letter is to present USEC's understanding related to certain requirements imposed by the Technical Safety Requirements (TSRs) and the Compliance Plan for the Criticality Accident Alarm System (CAAS). We request your concurrence with our understanding of these provisions.

TSRs 2.1.3.1, 2.2.3.2, 2.4.3.1, 2.5.3.1, 2.6.3.4, 2.7.3.2, and 2.8.3.1 require that the CAAS be "operable" and do not specifically recognize or explicitly exclude those areas of the plant where alarm coverage does not presently exist for nearby facilities. However, Compliance Plan Issue 44 explicitly recognizes that "several leased buildings that are located within 200 feet of buildings with criticality accident alarm system (CAAS) clusters ("clustered" buildings) do not have evacuation horns and lights activated by these clusters" and that "the criticality alarm horns from adjacent alarmed buildings cannot be heard within most of these unalarmed buildings". Therefore, the requirement that a criticality accident be annunciated into nearby buildings is not fully met at this time. The plan of action and schedule for Compliance Plan Issue 44 establishes completion dates for resolution of these noncompliances for routinely manned and routinely unmanned facilities of July 1, 1997 and July 1, 1998, respectively.

Both the Compliance Plan and the TSRs are conditions of the Certificate of Compliance and must be complied with in a consistent, coherent manner. Compliance Plan Issue 44 specifically recognizes that the CAAS TSRs have been altered by the Compliance Plan. In particular, the "Summary of Requirements, Commitments, and Noncompliances" section of Issue 44 specifically identifies the relevant TSRs (Reference page xvii and Issue 44, page 3) as the USEC commitments to which the Compliance Plan issue applies. Therefore, under the relevant TSR and Compliance Plan provisions, read together, USEC is required to have an operable CAAS and to be in full compliance with the applicable TSRs--except that full capability for annunciation in nearby buildings need not be provided until the dates specified in the Plan of Action and Schedule for Compliance Plan Issue 44.

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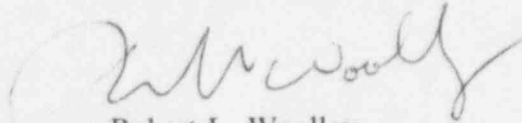
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To support USEC's continued preparation for NRC regulatory oversight on March 3, 1997, we request your review and response to this letter by February 21, 1997. As always, we are available to discuss this issue at your convenience.

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