

February 10, 1997

Dr. Ralph J. Reda  
Manager, Fuels and Facility Licensing  
General Electric Company  
P.O. Box 780, MC J26  
Wilmington, NC 28402

SUBJECT: LICENSE RENEWAL - REQUEST FOR ADDITIONAL INFORMATION  
(TAC NO. L10079)

Dear Dr. Reda:

This refers to your application dated April 5, 1996, requesting renewal of Materials License SNM-1097. Our review of your chemical safety program, has identified additional information that is needed before further action can be taken on your renewal.

The additional information should be provided in the form of responses to the individual comments, as appropriate, or as revised pages to the application, within 30 days of the date of this letter. Please reference the above TAC No. in future correspondence related to the renewal request.

Sincerely,

Original signed by:

Michael Lamastra  
Licensing Section 2  
licensing Branch  
Division of Fuel Cycle Safety  
and Safeguards, NMSS

**NRC FILE CENTER COPY**

Docket 70-1113  
License SNM-1097

Enclosure: Additional Information

DISTRIBUTION: (Control No. 2700)

Docket 70-1113

PUBLIC

NRC File Center

Region II

NMSS r/f

FCSS r/f

FCLB r/f

CBassett, RII

[G:\gechemq.mal]

OFC	FCLB <i>ML</i>	FCLB <i>E</i>	FCLB	FCLB <i>GP</i>
NAME	MLamastra	PShea <i>POS</i>	DStout <i>DS</i>	GPangburn
DATE	2/6/97	2/5/97	2/6/97	2/10/97

C = COVER

E = COVER & ENCLOSURE

N = NO COPY

OFFICIAL RECORD COPY

9702260015 970210  
PDR ADDOCK 07001113  
C PDR

250024

*NR05*  
*1/1*



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

February 10, 1997

Dr. Ralph J. Reda  
Manager, Fuels and Facility Licensing  
General Electric Company  
P.O. Box 780, MC J26  
Wilmington, NC 28402

SUBJECT: LICENSE RENEWAL - REQUEST FOR ADDITIONAL INFORMATION  
(TAC NO. L10079)

Dear Dr. Reda:

This refers to your application dated April 5, 1996, requesting renewal of Materials License SNM-1097. Our review of your chemical safety program, has identified additional information that is needed before further action can be taken on your renewal.

The additional information should be provided in the form of responses to the individual comments, as appropriate, or as revised pages to the application, within 30 days of the date of this letter. Please reference the above TAC No. in future correspondence related to the renewal request.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Lamastra", is written over a horizontal line.

Michael Lamastra  
Licensing Section 2  
Licensing Branch  
Division of Fuel Cycle Safety  
and Safeguards, NMSS

Docket 70-1113  
License SNM-1097

Enclosure: Additional Information

G.E. - Wilmington Renewal Application Comments

Chemical Safety Program

Chapter 3.0 - Conduct of Operations

1. Page 3.1, Section 3.1.1, At what frequency are periodic comparison assessments conducted?
2. Page 3.1, Section 3.1.2, Please elaborate on the statement "The specific content of the information depends on the age of the design and the requirements in place at the time of design" and provide an example. For chemical process safety, what is the safety basis documentation and how is it maintained?
3. Page 3.2, Section 3.1.3, Who conducts initial training for the approved safety reviewer and is refresher training conducted?
4. Page 3.2, Section 3.1.4, Are the process descriptions maintained in the same manner as other five types of information listed or are they covered under the technical specifications and requirements category?
5. Page 3.2, Section 3.2, Does maintenance personnel conduct post maintenance functional testing on equipment other than safety related equipment?
6. Page 3.3, Section 3.2, Are maintenance instructions provided for every maintenance operation conducted by licensee maintenance personnel and contractor maintenance personnel not only for safety equipment but for preventive and corrective maintenance activities? Is there guidance for "skill of the craft" activities?
7. Page 3.3, Section 3.2, Is there a predictive maintenance program in place and documented?
8. Page 3.7, Section 3.4.2, Are evaluations conducted to assess the adequacy of operator and subcontractor personnel chemical safety training, are independent audits conducted?
9. Page 3.8, Section 3.6.1, What is the frequency of chemical safety audits and are there a minimum required per year?
10. Page 3.9, Section 3.6.3, Do the independent audits cover the chemical safety program? What is the frequency of audits?
11. Page 3.12, Section 3.9.2, What is the frequency for reviewing operating procedures that involve chemical safety?
12. General, Configuration Management, How are license amendments captured by the CM program?

ENCLOSURE

## Chapter 4.0 - Integrated Safety Analysis

13. Page 4.2, Section 4.4, List the processes covered or the reference in Chapter 1.0.
14. Page 4.4, Section 4.9, What is considered to be "extreme on-site catastrophes" and "serious on-site consequences" for chemical safety?
15. Page 4.4, Section 4.9, Examples of assurances to maintain readiness of controls to prevent or mitigate accidents are listed. Should Configuration Management, QA, and Audits and Assessments be included in this list?
16. Page 4.5, Section 4.9, Table 4.1, For Level 2 Consequences, what are the chemical "regulatory limits for safety"?
17. Page 4.7, Section 4.9, For chemical safety, identify the controls for the highest risk category. What are the "appropriate assurance elements" for mid-level risk controls? Provide examples of low-risk controls.

## Chapter 7.0 - Chemical Safety

18. Page 7.1, Section 7.0, Who is responsible for managing the chemical safety program at the facility?
19. Page 7.1, Section 7.1, Is the chemical safety program contained in a procedure, i.e., is there a document that lists how all the program elements (Integrated Safety Analyses (ISA), Conduct of Operations, Emergency Management, etc.) are related and expected to perform at the facility?
20. Page 7.1, Section 7.1, What is the basis of the chemical safety program, i.e., is it based on a corporate program or related chemical process safety requirements (29 CFR Part 1910.119)?
21. Page 7.1, Section 7.1, What chemicals are presently covered by the chemical process safety program (chemicals that have been evaluated through hazard evaluations or ISA)?
22. Page 7.1, Section 7.1, What is the criteria used to determine if a chemical is hazardous and could effect the nuclear safety program and what is the nuclear safety program?
23. Page 7.1, Section 7.1, Are all hazardous chemicals evaluated or are some determined to have no impact? How is this process conducted, documented and verified? What is the threshold for conducting hazards analyses?

24. Page 7.2, Section 7.2.2, Is there a procedure that outlines the approval/evaluation process described in 7.2.2? Is chemical incompatibility considered as a potential hazard? In the second paragraph, the phrase "not NRC regulated" should be deleted.
25. Page 7.2, Section 7.2.2, Does the formal approval process described in 7.2.2 require approval of the person described in Question #18 above?
26. Page 7.2, Section 7.2.2, Is this program audited on a specified basis?
27. Page 7.2, Section 7.2.3, What are the applicable regulations for labeling or identifying hazardous materials? How are personnel made aware of these regulations? Is training required? Is compliance with applicable regulations audited and documented?
28. Page 7.3, Section 7.2.4, The statement in 7.2.4 "Conformance to these standards is not NRC regulated" should be deleted. NRC responsibilities do involve plant conditions related to the presence of hazardous chemicals on or near a fuel cycle site that could affect radiation safety. This area is discussed specifically under paragraph C of the Branch Technical Position on Chemical Safety For Fuel Cycle Facilities dated March 21, 1989, and should be understood.
29. Page 7.3, Section 7.2.5, Are root causes analyzed and used for a lessons learned program and is this program proceduralized?