

70-7001



UNITED STATES  
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

February 28, 1997

Mr. James H. Miller  
Vice President, Production  
U. S. Enrichment Corporation  
2 Democracy Center  
6903 Rockledge Drive  
Bethesda, MD 20817

SUBJECT: LINKAGE OF CRITICALITY ACCIDENT ALARM SYSTEM (CAAS) TECHNICAL  
SAFETY REQUIREMENTS (TSRs) AND COMPLIANCE PLAN REQUIREMENTS  
FOR PORTSMOUTH (PORTS) AND PADUCAH (PGDP) GASEOUS DIFFUSION  
PLANTS

Dear Mr. Miller:

This refers to two of your letters dated February 14, 1997 (GDP 97-0013 for PGDP and GDP 97-0015 for PORTS) requesting a review of and response to USEC's understanding related to certain requirements imposed by the TSRs and the Compliance Plan for CAAS audibility.

PORTS TSRs 2.1.3.1b, 2.2.3.2b, 2.4.3.1b, 2.5.3.1b, 2.6.3.4b, 2.7.3.2b, and 2.8.3.1b require CAAS audibility in all areas where the maximum foreseeable absorbed dose in free air exceeds 12 rad. Issue 44 of the PORTS Compliance Plan (DOE/ORO-2027/R3 "Plan for Achieving Compliance with NRC Regulations at the Portsmouth Gaseous Diffusion Plant") identifies several leased buildings located within 200 feet of the buildings with CAAS clusters, which do not have evacuation horns and lights activated by these clusters. The completion dates for resolution of these noncompliances for routinely manned and routinely unmanned facilities are July 1, 1997 and July 1, 1998, respectively.

PGDP TSRs 2.1.4.5b, 2.2.4.3b, 2.3.4.7b, 2.4.4.2b, and 2.6.4.1b require CAAS audibility in all areas where the maximum foreseeable absorbed dose in free air exceeds 12 rad. Issue 46 of the PGDP Compliance Plan (DOE/ORO-2026/R3 "Plan for Achieving Compliance with NRC Regulations at the Paducah Gaseous Diffusion Plant") recognizes that there are areas within the process buildings where CAAS horns are not audible. In addition, PGDP Compliance Plan Issue 50 identifies several leased buildings located within the 12 rad radius of the buildings with CAAS clusters, which do not have evacuation horns and lights activated by these clusters. A completion date for resolution of these noncompliances is December 15, 1998.

**NRC FILE CENTER COPY**

9703050421 970228  
PDR ADOCK 07007001  
C PDR

The USEC certification application, was required by 10 CFR Part 76.35(b) to include a plan for achieving compliance with areas of noncompliance with regulations applicable to the Gaseous Diffusion Plant. The NRC staff considers this approved Compliance Plan as a vehicle to bring USEC into compliance with NRC requirements, over an appropriate period of time, during which compensatory measures are implemented as prescribed in the Justification for Continued Operation sections of each Compliance Plan issue. Therefore, after March 3, 1997, and before the respective completion deadlines for the above mentioned Compliance Plan issues, the NRC will not consider activities which are in conformance with the Compliance Plans, including any associated compensatory measures, to be violations.

If you have any questions regarding this matter, please contact Yawar Faraz for PORTS at (301) 415-8113 or Merri Horn for PGDP at (301) 415-8126.

Sincerely,

**Original Signed By**

Robert C. Pierson, Chief  
Special Projects Branch  
Division of Fuel Cycle Safety  
and Safeguards, NMSS

Dockets 70-7001 and 70-7002

Certificates GDP-1 and GDP-2

cc: Mr. Randall DeVault, DOE-OR  
Mr. Dale Allen, PORTS  
Mr. Steve Polston, PGDP

DISTRIBUTION:

Dockets 70-7001, 70-7002      NRC File Center      PUBLIC      GShear,RIII  
KO'Brien,RIII      SPB r/f      FCSS r/f      NMSS r/f  
WSchwink,FCOB      CCox,RIII      LTEnEyck      WBrach  
G:\TSRCPLNY.LNK

\*See previous concurrence

OFC	SPB	E	SPB		*SPB		SPB		RIII	OGC	SPB	
NAME	YFaraz:R	YAF	MHorn		DAHoadley		BMartin		GLS	KLW&SAT	RPIerson	
DATE	2/27/97		1/97		2/26/97		2/27/97		2/28/97	2/27/97	2/27/97	

C = COVER

E = COVER & ENCLOSURE

N = NO COPY

OFFICIAL RECORD COPY

The NRC staff considers the approved Compliance Plans as vehicles to bring USEC into compliance with NRC requirements, over an appropriate period of time, during which compensatory measures are implemented as prescribed in the Justification for Continued Operation sections of each Compliance Plan issue. Therefore, the NRC staff requests that by April 3, 1997, you propose amendments to the above mentioned TSRs so as to make them consistent with their respective above mentioned Compliance Plan issues. Please be advised that after March 3, 1997, which is the expected transition date of USEC leased areas from the Department of Energy regulatory jurisdiction to NRC regulatory jurisdiction, and before the effective date of the amended CAAS TSRs, the NRC staff will not consider PORTS and PGDP to be in violation of the existing CAAS TSRs for conditions which fall within the discrepancy described above between the TSRs and Compliance Plan issues.

If you have any questions regarding this matter, please contact Yawar Faraz for PORTS at (301) 415-8113 or Merri Horn for PGDP at (301) 415-8126.

Sincerely,

Robert C. Pierson, Chief  
Special Projects Branch  
Division of Fuel Cycle Safety  
and Safeguards, NMSS

Dockets 70-7001 and 70-7002

Certificates GDP-1 and GDP-2

cc: Mr. Randall DeVault, DOE-OR  
Mr. Dale Allen, PORTS  
Mr. Steve Polston, PGDP

DISTRIBUTION:

Dockets 70-7001, 70-7002 NRC File Center PUBLIC GShear, RIII  
KO'Brien, RIII SPB r/f FCSS r/f NMSS r/f  
WShwink, FCOB CCox, RIII  
G:\TSRCPLN.LNK

OFC	SPB	C	SPB	C	SPB	2C	SPB		OGC		SPB	
NAME	YFaraz:fj		MHorn		DAHoadley		DMartin				RPierson	
DATE	2/26/97		2/26/97		2/26/97		1/197		1/197		1/197	

C = COVER

E = COVER & ENCLOSURE

N = NO COPY

OFFICIAL RECORD COPY