



United States
Enrichment Corporation

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United States
Enrichment Corporation

2 Democracy Center
6903 Rockledge Drive
Bethesda, MD 20817

Tel. (301) 564-3200
Fax (301) 564-3201

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 97-0013

Paducah Gaseous Diffusion Plant (PGDP)
Docket No. 70-7001
Criticality Accident Alarm System (CAAS) Audibility

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 2.1.4.5, 2.2.4.3, 2.3.4.7, 2.4.4.2, and 2.6.4.1 require that the CAAS be "operable" and do not specifically recognize or explicitly exclude those areas of the plant where fully audible alarm coverage does not presently exist. However, Compliance Plan Issue 46 explicitly recognizes that there are areas in process buildings where CAAS horns "are not audible to personnel due to high ambient noise levels" and establishes a plan of action and schedule to resolve this noncompliance by December 15, 1998.

In addition, the description of noncompliance associated with Compliance Plan Issue 50 recognizes that "several leased buildings located within the evacuation area 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 all areas requiring evacuation is not fully met at this time. The plan of action and schedule for Compliance Plan Issue 50 establishes a completion date of December 15, 1998 to resolve this noncompliance.

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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 Issues 46 and 50 specifically recognize that the CAAS TSRs have been altered by the Compliance Plan. In particular, the "Summary of Requirements, Commitments, and Noncompliances" sections of Issues 46 and 50 specifically identify the relevant TSRs (Reference pages xix, xx; Issue 46, page 3; and Issue 50, page

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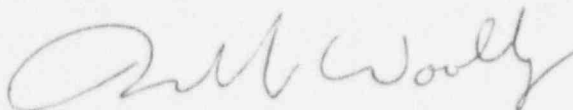
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3) as the USEC commitments to which those particular Compliance Plan issues apply. Therefore, under the relevant TSR and Compliance Plan provisions, read together, USEC is required to have an operable CAAS and to be in full compliance with the applicable TSRs--except that full audibility and the capability for annunciation in all areas requiring evacuation need not be provided until December 15, 1998.

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