



United States
Enrichment Corporation

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February 28, 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 97-0022

Paducah Gaseous Diffusion Plant (PGDP)
Portsmouth Gaseous Diffusion Plant (PORTS)
Docket Nos. 70-7001 & 70-7002
10 CFR 76.68(b) Requirements for the Evaluation of As-Found Conditions

Dear Mr. Pierson:

The purpose of this letter is to confirm our understanding of the requirements of 10 CFR 76.68(b) regarding the evaluation of as-found conditions. This subject was discussed in conference calls with you and members of your staff on February 20 and 25, 1997.

The second sentence of 10 CFR 76.68(b) requires that: "The Corporation shall evaluate any as-found conditions that do not agree with the plant's programs, plans, policies, and operations in accordance with paragraph (a) of this part". Paragraph (a) of 10 CFR 76.68 outlines the provisions for determining whether proposed changes to the plant or plant operations as described in the safety analysis report (SAR) may be made without prior NRC approval. In order to satisfy the above requirements of 10 CFR 76.68(b), if USEC proposes either: (1) to maintain the as-found condition in place and modify the SAR to conform to the as-found condition; or (2) to modify the as-found condition to conform to the SAR, an evaluation will be performed in accordance with 10 CFR 76.68(a) to determine if prior NRC approval is required. Upon initial identification of the as-found condition and pending selection of a proposed disposition as described above, operability and reportability determinations will be performed as required; however, a 10 CFR 76.68(a) evaluation of the original as-found condition need not be prepared.

This letter does not require any specific NRC approval unless you disagree with our understanding of this issue.

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Should you have any questions or require additional information, please contact me at (301) 564-3413 or Steve Routh at (301) 564-3251. There are no new commitments contained in this letter.

Sincerely,

S.D. Routh for

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