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April 28, 1997

Dr. Carl J. Paperiello
Director, Office of Nuclear Material
Safety and Safeguards
Attention: Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

SERIAL: GDP 97-0064

Portsmouth Gaseous Diffusion Plant (PORTS)
Docket No. 70-7002
Certificate Amendment Request-Air Gap Design Feature

Dear Dr. Paperiello:

In accordance with 10 CFR 76.45, the United States Enrichment Corporation (USEC or Corporation) hereby submits a request for amendment to the certificate of compliance for the Portsmouth, Ohio Gaseous Diffusion Plant (GDP). This certificate amendment request revises TSR Section 2.6.4.2, Air Gaps, to correct a typographical error which involves the changing of the word "pressure" to "presence". Once corrected, the surveillance would read as follows: "Verify and document the presence of air gaps required by NCSAs".

The air gaps are used by design in the X-705 "B" Area for hard piping of water-to-process piping connections and all drains to prevent back flow to geometrically unsafe systems. TSR Surveillance (SR) 2.6.4.2.1 supports the Air Gap Design Feature for the X-705 "B" Area drains and water-to-process connections. The intent of the surveillance is to verify that the air gaps are in place as specified by the applicable NCSAs.

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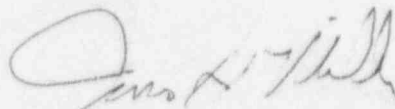
Dr. Carl J. Paperiello
April 28, 1997
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Enclosure 1 to this letter provides a detailed description and justification for the proposed change. Enclosure 2 is a copy of the revised TSR page. Enclosure 3 contains the basis for USEC's determination that the proposed change associated with this certificate amendment request is not significant.

Since this proposed certificate amendment request is an enhancement to the Technical Safety Requirements and is not required to support continued operation, USEC requests NRC review and approval at your earliest convenience. The amendment should become effective 30 days from issuance.

Any questions related to this subject should be directed to Mr. Mark Smith at (301) 564-3244.

Sincerely,



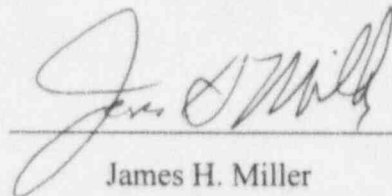
James H. Miller
Vice President, Production

Enclosures: As Stated

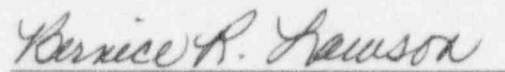
cc: NRC Region III Office
NRC Resident Inspector - PGDP
NRC Resident Inspector - PORTS
Mr. J. Dale Jackson (DOE)

OATH AND AFFIRMATION

I, James H. Miller, swear and affirm that I am Vice President, Production, of the United States Enrichment Corporation (USEC), that I am authorized by USEC to sign and file with the Nuclear Regulatory Commission this Certificate Amendment Request for the Portsmouth Gaseous Diffusion Plant, that I am familiar with the contents thereof, and that the statements made and matters set forth therein are true and correct to the best of my knowledge, information, and belief.


James H. Miller

Subscribed to before me on this 28 day of April, 1997.



Notary Public
BERNICE R. LAWSON
NOTARY PUBLIC STATE OF MARYLAND
Certificate filed in Montgomery County
Commission Expires August 1, 1997

**United States Enrichment Corporation(USEC)
Proposed Certificate Amendment Request
Air Gap Design Feature
Detailed Description of Change**

This proposed change involves the changing of TSR Surveillance (SR) 2.6.4.2.1 from "Verify and document the pressure of air gaps required by NCSAs" to "Verify and document the presence of air gaps required by NCSAs" to correct a typographical error which resulted in the use of "pressure" instead of "presence". The air gaps are used by design in the X-705 "B" Area for hard piping of water-to-process piping connections and all drains to prevent back flow to geometrically unsafe systems. TSR Surveillance (SR) 2.6.4.2.1, supports the Air Gap Design Feature for the X-705 "B" Area drains and water-to-process connections. The intent of the surveillance is to verify that the air gaps are in place as specified by the applicable NCSAs. While it is theoretically possible to measure the pressure of an air gap, i.e. atmospheric pressure, it is sufficient to visually denote that there is an air gap between two pipes or a pipe and a drain to satisfy the NCSA requirements. The air gaps in the X-705 "B" Area are accessible such that the existence of the air gaps can be visually ascertained.

Proposed Certificate Amendment Request Portsmouth Gaseous Diffusion Plant Letter GDP97-0064 Removal/Insertion Instructions	
Remove Page	Insert Page
VOLUME 4	
Section 2.6.4.2 Page 2.6-18	Section 2.6.4.2 Page 2.6-18

SECTION 2.6 SPECIFIC TSRs FOR X-705 DECONTAMINATION FACILITY

2.6.4 GENERAL DESIGN FEATURES

2.6.4.1 Handtable Overflows

DF: Handtables shall have a ≤ 1.5 inch high overflow.

SURVEILLANCE:

Frequency	Surveillance
Annually	SR 2.6.4.1.1 Verify that ≤ 1.5 inch high overflow is not obstructed and that a 5 inch overflow receiving container is used

BASIS:

Potential solution criticality from an "unsafe" slab thickness in a handtable is prevented by overflow drains [SAR Sections 3.3.1.3.2.7 & 4.3.1.2.2.1].

2.6.4.2 Air Gaps

DF: Air gaps shall be installed at all "B" area drains and water-to-process connections that connect to geometrically unsafe systems as required by a NCSA

SURVEILLANCE:

Frequency	Surveillance
Annually	SR 2.6.4.2.1 Verify and document the presence of air gaps required by NCSAs.

BASIS:

Air gaps are used by design for piping to drains to prevent backflow to geometrically unsafe systems [SAR Section 4.3.1.3.3]

**United States Enrichment Corporation (USEC)
Proposed Certificate Amendment Request
Air Gap Design Feature
Significance Determination**

The United States Enrichment Corporation (USEC) has reviewed the proposed changes associated with this certificate amendment request and provides the following Significance Determination for consideration.

1. No Significant Decrease in the Effectiveness of the Plant's Safety, Safeguards or Security Programs

The correction of a typographical error by changing of the word "pressure" to "presence" for an air gap design feature is not addressed in plant safety, safeguards or security programs contained in Volume 3 of the Application for United States Nuclear Regulatory Commission Certification for the Portsmouth Gaseous Diffusion Plant. Therefore, the effectiveness of these programs is unaffected by these changes.

2. No Significant Change to Any Conditions to the Certificate of Compliance

None of the Conditions to the Certificate of Compliance for Operation of Gaseous Diffusion Plants (GDP-2) specifically address design features or their related surveillances. Thus, the proposed change has no impact on any of the Conditions to the Certificate of Compliance.

3. No Significant Change to Any Condition of the Approved Compliance Plan

The required action to revise TSR 2.6.4.2.1 to correct a typographical error is not addressed by the Compliance Plan nor in any conditions of the Compliance Plan.

4. No Significant Increase in the Probability of Occurrence or Consequences of Previously Evaluated Accidents

The revision of TSR surveillance 2.6.4.2.1 to correct a typographical error will not increase the probability of occurrence or consequences of any postulated accident currently identified in the SAR. In either case, verifying the air pressure or verifying the presence of an air gap ensures that the air gaps referred to in the design feature will remain in place and therefore satisfy the assumptions made in the accident analysis.

**United States Enrichment Corporation (USEC)
Proposed Certificate Amendment Request
Air Gap Design Feature
Significance Determination**

5. No New or Different Type of Accident

The revision of TSR 2.6.4.2.1 to correct a typographical error will not create a new or different type of accident than those previously analyzed. The word change will not add any new accident initiator since the requirement to verify the air gaps will remain in the TSR.

6. No Significant Reduction in Margins of Safety

The requirement to verify the presence of air gaps to prevent backflow to geometrically unsafe systems will not be changed as a result of this TSR revision. The air gaps will still be verified as required by TSR 2.6.4.2.1. Therefore, this change will not reduce the margin of safety associated with this TSR.

7. No Significant Decrease in the Effectiveness of any Programs or Plans Contained in the Certificate Application

The air gap design feature is not addressed in plant safety, safeguards or security programs. Therefore, the correction of a typographical error by changing of the word "pressure" to "presence" will not decrease the effectiveness of these programs.

8. The Proposed Changes do not Result in Undue Risk to 1) Public Health and Safety, 2) Common Defense and Security, and 3) the Environment.

The correction of a typographical error by changing of the word "pressure" to "presence" for an air gap design feature does not increase the probability or consequence of any previously analyzed accident. In addition, criticality accidents for which this design feature is intended to prevent are local events. This change has no impact on plant effluents or on the programs and plans in place to implement physical security. As such, this change does not represent an undue risk to public health and safety. Therefore, this change will have no adverse impact on the environment or the common defense and security.

**United States Enrichment Corporation (USEC)
Proposed Certificate Amendment Request
Air Gap Design Feature
Significance Determination**

9. There is No Change in the Types or Significant Increase in the Amounts of any Effluents that May be Released Offsite.

This change has no effect on the generation or disposition of effluents, therefore, it does not change the types or amounts of effluents that may be released offsite.

10. There is No Significant Increase in Individual or Cumulative Occupational Radiation Exposure.

The revision of TSR 2.6.4.2.1 to correct a typographical error will not increase the probability of occurrence or consequences of any postulated accident currently identified in the SAR. This change does not relate to controls used to minimize occupational radiation exposure. Therefore, there is no significant increase in individual or cumulative occupational radiation exposure.

11. There is No Significant Construction Impact.

This change does not involve a plant modification, therefore it will not impact construction.

12. There is no Significant Increase in the Potential for Radiological or Chemical Consequences from Previously Analyzed Accidents.

The revision of TSR 2.6.4.2.1 will not increase the probability of occurrence or consequences of any postulated accident currently identified in the SAR. Verifying the air gap requirement remains in place to ensure the assumptions used in the accident analysis are satisfied. Therefore, there is no significant increase in the potential for radiological or chemical consequences from previously analyzed accidents.