



UNITED STATES  
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

May 13, 1997

DOCKET: 70-7001

CERTIFICATE HOLDER: United States Enrichment Corporation  
Paducah Gaseous Diffusion Plant  
Paducah, KY

SUBJECT: COMPLIANCE EVALUATION REPORT: APPLICATION DATED  
MARCH 31, 1997, CHANGES TO TSRS 2.1.4.4 AND 2.3.4.8

BACKGROUND

By letter dated March 31, 1997, the United States Enrichment Corporation (USEC) requested an amendment to the Certificate of Compliance for the Paducah Gaseous Diffusion Plant (PGDP). The request is to revise the Technical Safety Requirement (TSR) for the fire protection system in buildings C-310 and C-315 and the TSR on the cylinder scale cart movement prevention system.

DISCUSSION

USEC has proposed to revise TSR 2.3.4.8 to broaden the applicability statement. TSR 2.3.4.8 covers the building sprinkler systems in buildings C-310 and C-315. Building C-310 is the Product Building and C-315 is the Surge and Waste Building (tails withdrawal). Currently the TSR requires the system to be operable in withdrawal Mode 1 through Mode 3, except when the lube oil is valved off or removed from the equipment. The concern is over building C-310 because it contains both enrichment cascade and withdrawal systems. Section 2.3 of the TSRs covered withdrawal operations and Section 2.4 covered the enrichment cascade. The original intent was to include all of the C-310 fire protection TSR requirements in Section 2.3. However, as written, it is not clear that TSR 2.3.4.8 covers all situations. The plant is usually withdrawing product, however, it is conceivable that the plant could be in a situation where product withdrawal was not occurring but sprinkler coverage was required by the accident analysis for operating cascade cells. The current TSR does not cover this situation. The intent of the accident analysis is to require sprinkler coverage for withdrawal operations and enrichment operations except when the lube oil is valved off or removed from the equipment. The proposed TSR change would revise the applicability statement to require the system to be operable at all times except when the lube oil is valved off or removed from the equipment. This is consistent with the accident analysis.

USEC has also proposed a change to TSR 2.1.4.4. This TSR covers operation of the cylinder scale cart movement prevention system in the Toll Transfer and Sampling Facility. Condition B of the TSR contains an editorial error. It currently refers to the withdrawal cylinder pigtail instead of the receiving cylinder pigtail; the receiving cylinder pigtail is correctly identified in other portions of the TSR. The proposed change corrects the editorial error.

## ENVIRONMENTAL REVIEW

Issuance of an amendment to Certificate of Compliance GDP-1 to revise the applicability statement for the C-310 fire protection system and to make an editorial change in the cylinder scale cart movement prevention system TSR are subject to the categorical exclusion provided in 10 CFR 51.22(c)(19). Therefore, neither an environmental assessment nor an environmental impact statement is required for the proposed action.

## CONCLUSION

The change to broaden the C-310 sprinkler system applicability statement (TSR 2.3.4.8) will make it consistent with the intent of the accident analysis. The change to TSR 2.1.4.4 is an editorial correction. The staff recommends that the TSR changes be approved.

The Region III Inspection staff has no objection to this proposed action.

### Principal Contributor

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