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May 22, 2020
20-042

Ms. Andrea Kock, Director
Division of Fuel Management
Office of Nuclear Materials Safety and Safeguards
U.S Nuclear Regulatory Commission
Washington D.C. 20555-001

Reference: (1) License No. SNM-42, Docket 70-27

(2) Letter Dated March 23, 2020, BWXT (Burch) to NRC (Kock), Requests for Regulatory Relief from Nuclear Criticality Safety, Radiation Protection, Fire Protection, Material Control & Accounting and Emergency Preparedness Requirements in the SNM-42 License Application – COVID-19 Pandemic Response

(3) TSG-DFM-2020-01, Dated April 21, 2020, Temporary Staff Guidance – Fuel Facility Requests for Regulatory Relief Related to COVID-19

Subject: Requests for Regulatory Relief from Specific Requirements in the SNM-42 License Application – COVID-19 Pandemic Response

Dear Ms. Kock:

At this time, BWXT NOG-L is still conducting routine operations in accordance with regulatory requirements and internal procedures. In Reference 2, BWXT NOG-L requested relief for certain areas of the facility in the event staffing levels became insufficient to support continued operation due to the COVID-19 Pandemic. A comprehensive relief request such as the one provided in Reference 2 is not anticipated to be necessary based on current employee attendance data. However, to ensure preparedness should a resurgence of the pandemic cause an unexpected drop in employee attendance at the facility, BWXT Nuclear Operations Group - Lynchburg, Inc. (BWXT NOG-L), is requesting relief via a temporary license amendment until December 31, 2020, from three specific Radiation Protection requirements in Chapter 4 of the SNM-42 License Application. Specific details of our request are contained in the enclosure to this letter and were prepared following the guidance of Section 4.E in Reference 3.

If you have any questions regarding the requests or require further information, please contact David Ward, Manager of Environment, Safety, Health and Safeguards, at (434) 522-5678.

Sincerely,

A handwritten signature in black ink, appearing to read "B. Joel Burch", is written over a horizontal line.

B. Joel Burch
Vice President and General Manager
BWXT Nuclear Operations Group, Inc. - Lynchburg

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Enclosure

cc: NRC, James Downs, Senior Project Manager
NRC, Region II
NRC, Resident Inspector

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