



United States
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June 11, 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 97-0090

Paducah Gaseous Diffusion Plant (PGDP)
Docket No. 70-7001
Transmittal of Revision 11 to Paducah Certification Application

Dear Dr. Paperiello:

In accordance with 10 CFR Part 76, the United States Enrichment Corporation (USEC) hereby submits twenty (20) copies of Revision 11 (June 15, 1997) to USEC-01, Application for United States Nuclear Regulatory Commission Certification, Paducah Gaseous Diffusion Plant.

Revision 11 incorporates changes to the Technical Safety Requirements (TSR) and Safety Analysis Report (SAR). These changes were previously submitted for your review in accordance with 10 CFR 76.45 and were approved as Amendment 3 to the Certificate of Compliance GDP-1 in your letter dated May 16, 1997 (TAC NO. L32015). Revision 11 also incorporates changes to TSR basis statements to update references to sections of the SAR. These additional changes have been reviewed in accordance with the requirements of 10 CFR 76.68 and have been determined not to require prior NRC approval. Revision bars are provided in the right-hand margin to identify the changes. Revision 11 will be implemented on June 15, 1997. //

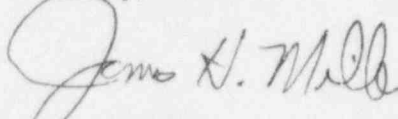
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Dr. Carl J. Paperiello
June 11, 1997
GDP 97-0090 Page 2

Should you have any questions or comments on Revision 11, please call me at (301) 564-3309 or Steve Routh at (301) 564-3251. The enclosure identifies commitments made in this submittal.

Sincerely,



James H. Miller
Vice President, Production

Enclosure: Commitments Contained in this Submittal

Attachment: USEC-01, Application for United States Nuclear Regulatory Commission
Certification, Paducah Gaseous Diffusion Plant, Revision 11,
Copy Numbers 567 through 586

Enclosure: Affidavit

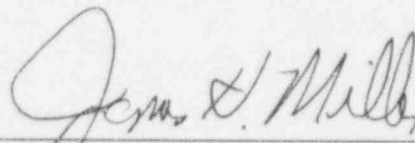
cc:	NRC Region III Office	Copy Numbers 442, 664
	NRC Resident Inspector - PGDP	Copy Number 697
	NRC Resident Inspector - PORTS	Copy Number 665
	Mr. Joe W. Parks (DOE)	Copy Numbers 641 through 644

Commitments Contained in This Submittal

1. Revision 11 will be implemented on June 15, 1997.

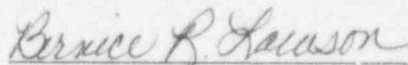
OATH AND AFFIRMATION

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 Revision 11 of the USEC Application for United States Nuclear Regulatory Commission Certification, Paducah Gaseous Diffusion Plant (USEC-01), 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 11 day of June, 1997.



Notary Public

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

APPLICATION FOR UNITED STATES
NUCLEAR REGULATORY COMMISSION CERTIFICATION
PADUCAH GASEOUS DIFFUSION PLANT
REMOVE/INSERT INSTRUCTIONS
REVISION 11
JUNE 15, 1997

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1.0 DEFINITIONS

Assay — As used in the uranium enrichment industry, the ^{235}U isotopic concentration relative to total uranium in a uranium-bearing material, typically stated in wt % (e.g., 2.75% assay)

Completion Time - The Completion Time is the amount of time allowed for completing a Required Action. It is referenced to the time of discovery of a situation (e.g., inoperable equipment or variable not within limits) that requires entering an ACTIONS Condition unless otherwise specified, providing the system/component is in a MODE or specified condition stated in the Applicability of the LCO. Required Actions must be completed prior to the expiration of the specified Completion Time. An ACTIONS Condition remains in effect and the Required Actions apply until the Condition no longer exists or the system/component is not within the LCO Applicability.

If a Completion Time requires periodic performance on a "once per ..." or "every hour thereafter ..." basis, the 25% time interval extension specified in the Note to Section 3.0 applies to each performance after the initial performance. For Completion Times specified as "once," the 25% time interval extension does not apply.

Independent Assessment — A determination of the capabilities, performance and overall effectiveness of the a program performed by persons not associated with the program or topic being assessed.

Nuclear materials (NMs) — Materials such as uranium, uranium bearing material, thorium, neptunium, or ^{233}U for which accountability is required by NRC.

Safeguards — An integrated system of physical protection, accountability, and material control measures designed to deter, prevent, detect, and respond to unauthorized possession and/or use of SNM.

Tails — Depleted UF_6 below normal assay, which is withdrawn from the "bottom" of the cascade and placed into long-term storage.

Inspect — Inspect, unless specifically stated otherwise, is intended in the standard usage of the word, i.e., visual evaluation for acceptability.

UF_6 Cylinder (or cylinder) — Unless otherwise specified, UF_6 cylinder (or cylinder) is intended to be limited to large (2 1/2- ton and larger) UF_6 cylinders.

2.0 LIST OF ACRONYMS

The following is a list of acronyms used throughout the USEC Application.

ACL	-	Administrative Control Level
ADP	-	Automatic Data Processing
ALARA	-	As Low As Reasonably Achievable
ASME	-	American Society of Mechanical Engineers
ANSI	-	American National Standards Institute
AQ	-	Augmented Quality
ARA	-	Airborne Radioactivity Area
CCF	-	Central Control Facility
CAAS	-	Critical Accident Alarm System

CCB	-	Change Control Board
CCZ	-	Contamination Control Zone
CFR	-	Code of Federal Regulations
CM	-	Configuration Management
CM	-	Crisis Manager
CUP	-	Cascade Upgrading Program
DOE	-	United States Department of Energy
EAL	-	Emergency Action Level
ECSR	-	Environmental Compliance Status Report
EOC	-	Emergency Operations Center
EPA	-	Environmental Protection Agency
EPIP	-	Emergency Plan Implementing Procedure
ERO	-	Emergency Response Organization
FNMC	-	Fundamental Nuclear Materials Control Plan
GERT	-	General Employee Radiological Training
GET	-	General Employee Training
HP	-	Health Physics
HRA	-	High Radiation Area
HS&E	-	Health, Safety and Environmental
JCO	-	Justification for Continued Operations
LAW	-	Low Assay Withdrawal
LEU	-	Low Enriched Uranium
LMES	-	Lockheed Martin Energy Systems
LMUS	-	Lockheed Martin Utility Services
MBA	-	Material Balance Area
NBS	-	National Bureau of Standards
NCS	-	Nuclear Criticality Safety
NDA	-	Nondestructive Assay
NIST	-	National Institute of Standards and Technology
NM	-	Nuclear Material
NMSS	-	NRC Office of Nuclear Materials Safety and Safeguards
NRC	-	Nuclear Regulatory Commission
OSHA	-	Occupational Safety and Health Administration
PGDP	-	Paducah Gaseous Diffusion Plant
PM	-	Preventive Maintenance
PORC	-	Plant Operations Review Committee
PORTS	-	Portsmouth Gaseous Diffusion Plant
PRB	-	Procedures Review Board
PSS	-	Plant Shift Superintendent
PW	-	Product Withdrawal
QAP	-	Quality Assurance Program
RA	-	Radiation Area
RMA	-	Radioactive Material Area
RP	-	Radiation Protection
RWMP	-	Radioactive Waste Management Program
RWP	-	Radiological Work Permit
S&S	-	Safeguards and Security
SAE	-	Site Area Emergency

SAR	-	Safety Analysis Report
SM	-	Source Material
SNM	-	Special Nuclear Material
SOP	-	Standard Operating Procedure
SPP	-	Standard Practice Procedure
SS&Q	-	Safety, Safeguards, & Quality
SSC	-	Structures, Systems and Components
SWU	-	Separative Work Unit
TSR	-	Technical Safety Requirements
UE	-	Uranium Enrichment
UF ₆	-	Uranium Hexafluoride
USEC	-	United States Enrichment Corporation

3.0 FREQUENCIES

Interval Designation (Frequency)	Interval Between Consecutive Actions	Maximum Interval Between Consecutive Actions
Five-year	5 years to the day	5 years to the day (unless specifically stated otherwise)
Biennially	2 years	2 years 6 months
Annually	365 days	456 days
Semiannually	184 days	245 days
Quarterly	92 days	123 days
Monthly	31 days	39 days
Daily	24 hours	30 hours
Per Shift	12 hours	15 hours
Twice Each Shift	6 hours	8 hours

NOTE: The extension between the standard and maximum surveillance intervals is intended to be used to accommodate operational and maintenance scheduling. The extension between the standard and maximum surveillance intervals is 25% of the standard value with the exception of twice each shift, quarterly, and semiannual items. The extension on these intervals is 33% which is consistent with past plant practice.

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SECTION 1.0 USE AND APPLICATION

1.1 INTRODUCTION

10 CFR 76.87(a) states that "The Corporation shall establish technical safety requirements. In establishing the requirements, the Corporation shall consider the analyses and results of the safety analysis report submitted pursuant to 10 CFR 76.35." These Technical Safety Requirements (TSRs) are intended to fulfill the requirements of 76.87 and set forth approved limitations for operation of the Paducah Gaseous Diffusion Plant (PGDP). The TSRs define the conditions, safe boundaries and the management or administrative controls necessary to ensure safe operation of the facility and are based on the accidents analyzed in the Safety Analysis Report (SAR).

1.2 DEFINITION OF TERMS

- 1.2.1 **Actions** - That part of a TSR that prescribes required actions to be taken under designated conditions within specified completion times.
- 1.2.2 **Administrative Controls** - The provisions relating to organization and management, procedures, recordkeeping, reviews and audit, and reporting necessary to ensure operation of the plant in a safe manner.
- 1.2.3 **Channel Check** - The qualitative assessment of channel behavior during operation. This determination shall be based on observation and shall include, where possible, a comparison of the channel indication and status with other indications and the status derived from independent instrument channels measuring the same parameter.
- 1.2.4 **Completion Time** - The Completion Time is the amount of time allowed for completing a Required Action. It is referenced to the time of discovery of a situation (e.g., inoperable equipment or variable not within limits) that requires entering an ACTIONS Condition unless otherwise specified, providing the system/component is in a MODE or specified condition stated in the Applicability of the LCO. Required Actions must be completed prior to the expiration of the specified Completion Time. An ACTIONS Condition remains in effect and the Required Actions apply until the Condition no longer exists or the system/component is not within the LCO Applicability.

SECTION 1.0 USE AND APPLICATION

1.2.5 Cylinder Categories - Cylinders are categorized as follows:

<u>Category</u>	<u>UF₆ Cylinder Model Number</u>
A	Cylinders with certified volumes containing less UF ₆ than the maximum fill limit for shipment or less UF ₆ than the maximum fill limit for in-plant tails storage (if filled with high purity tails), or cylinders which if heated to 235°F would have void volumes $\geq 5\%$ or void volumes $\geq 3\%$ if filled with high purity tails, according to TSR 2.1.4.6 or 2.2.4.4.
B	Cylinders filled beyond the Category A limits, which if heated to 230°F would have void volumes $\geq 5\%$ or void volumes $\geq 3\%$ if filled with high purity tails, according to TSR 2.1.4.6 or 2.2.4.4.
C	Damaged cylinders or cylinders filled beyond the limits of Categories A or B.

1.2.6 **Design Features (DF)** - Those design attributes of structures, systems, and components that passively prevent or mitigate the consequences of radiological accidents that could cause significant consequences.

1.2.7 **Fire Patrol** - Required to perform monitoring of an area for fire due to a fire suppression or detection system being impaired/inoperable. This monitoring shall be performed at regular intervals not to exceed the interval specified in the facility-specific TSR. The person performing the fire patrol must be instructed on the following: (1) specifically what system is inoperable and the area to be patrolled, (2) actions to take upon discovering a fire, and (3) procedures for reporting a fire.

1.2.8 **Functional Test** - The injection of a simulated or actual signal into the channel as close to the sensor as practicable to verify Operability, including required alarms, interlocks, trip functions, and channel failure trips. The Functional Test may be performed by any series of sequential, overlapping, or total channel steps such that the entire channel is tested.

1.2.9 **Immediately** - Required action shall be pursued without delay and in a controlled manner.

1.2.10 **Limiting Conditions for Operation (LCO)** - The lowest functional capability or performance levels of structures, systems, components and their support systems required for normal safe operation of the plant.

1.2.11 **Limiting Control Setting (LCS)** - Settings for automatic alarm or protective devices related to those variables having significant safety functions.

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- 1.2.12 Operating Cycle (Autoclave)** - The time between the initial entrance into the heating mode and the completion of the intended task (sample or transfer in C-360) or feeding and heeling in C-333-A and C-337-A) inclusive of mode changes allowed by the LCOs and their action statements which might occur during the course of the evolution.
- 1.2.13 Operable** - An SSC shall be operable or have operability when it is capable of performing its specified function(s), and when all necessary attendant instrumentation, controls, electrical power, cooling or seal water, lubrication, or other auxiliary equipment that are required for the SSC to perform its specified function(s) are also capable of performing their related support function(s).
- 1.2.14 Planned Expeditious Handling (PEH)** - The process of handling equipment that contains more than a safe mass of uranium (relative to ^{235}U assay) as determined by TSR 2.5, Appendix B.
- 1.2.15 Safety Limit (SL)** - Those bounds within which the process variables must be maintained for adequate control of the operation and that must not be exceeded in order to protect the integrity of the physical system that is designed to guard against the uncontrolled release of radioactivity.
- 1.2.16 Surveillance Requirements (SRs)** - Requirements relating to test, calibration, or inspection to ensure that the necessary quality of systems and components is maintained, that plant operation will be within the safety limits, and that the limiting conditions for operation will be met.
- 1.2.17 UF_6 Cylinder (or cylinder)** - Unless otherwise specified, UF_6 cylinder (or cylinder) is intended to be limited to large (2½-ton and larger) UF_6 cylinders.
- 1.2.18 Uncomplicated Handling** - The process of handling equipment that contains a deposit of less than or equal to an always safe mass.

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1.3 TIME INTERVALS FOR SURVEILLANCE

Interval Designation	Interval Between Consecutive Surveillances	Maximum Interval Between Consecutive Surveillances
Five-year	5 years to the day	5 years to the day (unless specifically stated otherwise)
Biennially	2 years	2 years 6 months
Annually	365 days	456 days
Semiannually	184 days	245 days
Quarterly	92 days	123 days
Monthly	31 days	39 days
Daily	24 hours	30 hours
Shiftly	12 hours	15 hours
Twice Each Shift	6 hours	8 hours

NOTE:

The extension between the standard and maximum surveillance intervals is intended to be used to accommodate operational and maintenance scheduling. The time interval between surveillances on in-service equipment should not routinely extend to the maximum allowable interval.

The extension between the standard and maximum surveillance intervals is 25% of the standard value with the exception of twice each shift, quarterly and semiannual items. The extension on these intervals is 33% consistent with past plant practice which has been in accordance with DOE 5481.1B.

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1.4 LIST OF ACRONYMS

ANSI	American National Standards Institute
DF	Design Feature
LCO	Limiting Conditions for Operation
LCS	Limiting Control Setting
MAWP	Maximum Allowable Working Pressure
NRC	Nuclear Regulatory Commission
PEH	Planned Expeditious Handling
TSR	Technical Safety Requirements
SAR	Safety Analysis Report
SL	Safety Limit
SR	Surveillance Requirement
SSC	Structure, System, or Component
UH	Uncomplicated Handling

1.5 INTENT OF TERMS

Shall	—	Requirement
Should	—	Recommendation
May	—	Permission

1.6 GENERAL APPLICATION

1.6.1 SAFETY LIMIT

1.6.1.1 Compliance with **SAFETY LIMIT** requirements is required during OPERATIONAL MODES specified in the Applicability statement.

1.6.1.2 If the **SAFETY LIMIT** is exceeded, immediately perform the following:

- a. If the conditions do not require evacuation, attempt to bring the affected parameter within the **SAFETY LIMIT** in a manner that leaves the facility/system in an operational mode for which the safety limit is not applicable.
- b. If appropriate, notify plant emergency personnel and initiate building evacuation.
- c. Conduct a technical evaluation to determine if any damage has occurred and to evaluate the ability of the system to be restarted.

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1.6.2 OPERATING LIMITS

1.6.2.1 LIMITING CONTROL SETTINGS

- a. Compliance with the **LIMITING CONTROL SETTING** requirement is required during the **OPERATIONAL MODES** specified in the Applicability statement.

1.6.2.2 LIMITING CONDITIONS FOR OPERATION

- a. Compliance with the **LIMITING CONDITIONS for OPERATION** contained in these requirements is required during the **OPERATIONAL MODES** specified in the Applicability statement, except as provided in 1.6.2.2.b.
- b. Upon discovery of a failure to meet an LCO, the Required Actions of the associated Conditions shall be met.
- c. When a **LIMITING CONDITION for OPERATION** is not met, complete the attendant action steps within the required time interval. If the action steps are not met within the specified time interval, or if none are provided, place the equipment/system in an operating mode for which the LCO does not apply. Action shall be initiated within 1 hour.

Exceptions to this TSR (1.6.2.2.c.) are stated in individual requirements.

Where corrective measures are completed that permit operation in accordance with the LCO or ACTIONS, completion of the actions required by this TSR (1.6.2.2.c.) is not required.

- d. Entry into an **OPERATIONAL MODE** that is applicable to a particular LCO shall not be made unless the conditions for the **LIMITING CONDITIONS for OPERATION** are met without reliance on provisions contained in the **ACTION** statement. Exceptions to this rule are stated in the individual requirements. Additionally, this provision shall not prevent passage through or to **OPERATIONAL MODES** required or allowed by **ACTION** statements.
- e. **LCO Completion Times.** The completion times for LCO required actions begin when that specific condition is discovered, regardless

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of how long that condition may have previously existed. All completion times within a single row of an LCO table are measured from the point of discovery of that condition.

If a Completion Time requires periodic performance on a "once per ..." or "every hour thereafter ..." basis, the 25% time interval extension specified in the Note to TSR USE and APPLICATION Section 1.3 applies to each performance after the initial performance. For Completion Times specified as "once," the 25% time interval extension does not apply.

- f. Equipment removed from service or declared inoperable to comply with **ACTIONS** may be returned to service under administrative control solely to perform testing required to demonstrate its **OPERABILITY** or the **OPERABILITY** of other equipment. This is an exception to 1.6.2.2.b. for the system returned to service under administrative control to perform the testing required to demonstrate **OPERABILITY**.

1.6.3 SURVEILLANCE REQUIREMENTS

- 1.6.3.1 **SURVEILLANCE REQUIREMENTS** shall be met prior to entering the **OPERATIONAL MODES** or other conditions specified in the Applicability statement for individual LCS and LCOs unless otherwise stated in an individual **SURVEILLANCE REQUIREMENT**.
- 1.6.3.2 Each **SURVEILLANCE REQUIREMENT** shall be performed in accordance with Section 2 and within the maximum time interval defined in Section 1.3. Surveillances do not have to be performed on SSCs which are not in, or being prepared to enter, the applicable operating mode(s).
- 1.6.3.3 Failure to perform a **SURVEILLANCE REQUIREMENT** within the maximum acceptable time interval constitutes a failure to meet the **OPERABILITY** requirements for a **LIMITING CONDITION** for **OPERATION**. Exceptions are stated in the individual requirements.

When it is discovered that a surveillance has not been performed within the maximum acceptable time interval for the frequency specified in Section 2, perform the following within either 24 hours or up to the limit of the specified frequency (whichever is less) of discovery:

- a. Perform the required surveillance, or

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- b. Place the equipment in an operating mode for which the system is not required.

In instances where inoperability is declared due to missed surveillances, this general usage action statement takes precedence over the facility-specific LCO action statement. In the event that the missed surveillance is not performed within the interval provided by this general LCO, the action steps associated with system inoperability shall be immediately initiated in accordance with the facility-specific LCO.

- 1.6.3.4 Entry into an OPERATIONAL MODE or other specified condition shall not be made unless the **SURVEILLANCE REQUIREMENT(s)** associated with the **LIMITING CONDITION for OPERATION** has been performed within the stated surveillance interval or as otherwise specified in the individual surveillance requirements. This provision shall not prevent passage through or to OPERATIONAL MODES as required or allowed by **ACTION** statements. Exceptions are stated in the individual requirements.

1.6.4 CONDITIONS OUTSIDE TSR

In an emergency, if a situation develops that is not addressed by the TSR, operations personnel should use their training and expertise to take actions to correct or mitigate the situation. Also, operations personnel may take actions that depart from a requirement in the TSR provided that: (a) an emergency situation exists; (b) these actions are needed immediately to protect the public and employee health and safety; and (c) no action consistent with the TSR can provide adequate or equivalent protection. Such actions must be approved by the Incident Commander as defined in the Emergency Plan. If emergency action is taken, both a verbal and written notification shall be made in accordance with 10 CFR 76.120.

SECTION 2.5 SPECIFIC TSRS FOR EQUIPMENT REMOVAL ACTIVITIES

2.5.4 GENERAL LIMITING CONDITIONS FOR OPERATION

2.5.4.1 PRE-REMOVAL EXAMINATION

LCO 2.5.4.1: An analysis or Non-Destructive Assay (NDA) survey shall be performed to determine the level of handling restrictions to be applied (PEH or UH).

APPLICABILITY: Prior to beginning removal of equipment listed in TSR 2.5 Appendix A which contains uranium enriched to ≥ 1.0 wt % ^{235}U .

ACTIONS:

Condition	Required Action	Completion Time
A. Applicable equipment removed prior to analysis or NDA.	A.1.1 Equipment openings shall be covered or closed	Immediately and until Action A.2 completed.
	<u>AND</u>	
	A.1.2 Establish and maintain a dry atmosphere within the equipment.	Immediately and until Action A.2 completed.
	<u>AND</u>	
	A.2 Establish special case-specific NCSA requirements for handling equipment.	Prior to beginning decontamination evolution.

SURVEILLANCE REQUIREMENTS: None.

BASIS:

Determining the mass of any uranium deposits in the equipment allows segregation and controlled handling of equipment containing amounts of ^{235}U that require additional controls to prevent the formation of an unsafe mass/geometry. [SAR Chapter 4, Appendix A, Section 2.6.2.3]

SECTION 2.5 SPECIFIC TSRs FOR EQUIPMENT REMOVAL ACTIVITIES

2.5.4 GENERAL LIMITING CONDITIONS FOR OPERATION

2.5.4.2 POST-REMOVAL EXAMINATION

LCO 2.5.4.2: Equipment categorized and removed as UH shall have the categorization verified with a post-removal visual or NDA inspection within 24 hours.

APPLICABILITY: After completion of the removal of equipment listed in TSR 2.5 Appendix A which contains uranium enriched to ≥ 1.0 wt % ^{235}U .

ACTIONS:

Condition	Required Action	Completion Time
A. UH categorization not properly verified.	A.1.1 Equipment openings shall be covered or closed	Immediately and until Action A.2 completed.
	<u>AND</u>	
	A.1.2 Establish and maintain a dry atmosphere within the equipment.	Immediately and until Action A.2 completed.
	<u>AND</u>	
	A.2 Establish special case-specific NCSA requirements for handling equipment.	Prior to beginning decontamination evolution.

SURVEILLANCE REQUIREMENTS: None.

BASIS:

The initial inspection is verified by a second inspection to prevent mishandling of equipment containing amounts of ^{235}U that require additional controls to prevent the formation of an unsafe mass/geometry. [SAR Chapter 4, Appendix A, Section 2.6.2.3]

SECTION 2.5 SPECIFIC TSRS FOR EQUIPMENT REMOVAL ACTIVITIES

2.5.4 GENERAL LIMITING CONDITIONS FOR OPERATION

2.5.4.3 PEH EQUIPMENT OPENINGS

LCO 2.5.4.3: Equipment openings shall be covered with fireproof covers and gasket seals when the equipment is not in the process of being decontaminated or being visually inspected.

APPLICABILITY: After removal of equipment categorized as PEH (equipment listed in TSR 2.5 Appendix A which contains more than a safe mass of uranium as determined by TSR 2.5 Appendix B)

ACTIONS:

Condition	Required Action	Completion Time
A. Applicable PEH equipment discovered with uncovered opening(s) while not being decontaminated or being visually inspected	A.1.1 Equipment openings shall be covered or closed	Immediately and until Action A.2 completed.
	<u>AND</u>	
	A.1.2 Establish and maintain a dry atmosphere within the equipment.	Immediately and until Action A.2 completed.
	<u>AND</u>	
	A.2 Establish special case-specific NCSA requirements for handling equipment.	Prior to resuming decontamination evolution.

SURVEILLANCE REQUIREMENTS:

Surveillance	Frequency
SR 2.5.4.3-1 Inspect equipment to verify openings are covered or closed when not being decontaminated.	Daily

BASIS:

Covering or closing equipment openings minimizes the introduction of moderator into the equipment from atmospheric moisture or external sources (e.g. overhead sprinklers). [SAR Chapter 4, Appendix A, Section 2.6.2.3]

SECTION 2.5 SPECIFIC TSRs FOR EQUIPMENT REMOVAL ACTIVITIES

2.5.4 GENERAL LIMITING CONDITIONS FOR OPERATION

2.5.4.4 PEH DECONTAMINATION TIME LIMITS

LCO 2.5.4.4: Applicable equipment categorized and removed as PEH shall be decontaminated to a safe mass or below within 72 hours from the start of equipment removal or 24 hours from the start of decontamination, whichever is sooner.

APPLICABILITY: After removal of equipment categorized as PEH (equipment listed in TSR 2.5 Appendix A which contains more than a safe mass of uranium as determined by TSR 2.5 Appendix B)

ACTIONS:

Condition	Required Action	Completion Time
A. Decontamination to a safe mass or less not achieved within 72 hours	A.1.1 Equipment openings shall be covered or closed	Immediately and until Action A.2 completed.
	<u>AND</u>	
	A.1.2 Establish and maintain a dry atmosphere within the equipment.	Immediately and until Action A.2 completed.
	<u>AND</u>	
	A.2 Establish special case-specific NCSA requirements for handling equipment.	Prior to resuming decontamination evolution.

SURVEILLANCE REQUIREMENTS: None

BASIS:

This control minimizes the potential for exposure of the UF_6/UF_4 to external moderating sources, such as humid air or other external water sources (fire protection system), that could result in a critical reaction by ensuring that there exists a barrier to the external water source. The decontamination evolution involves any actual disassembly and deposit removal that can be temporarily interrupted due to work area levels of HF but will proceed to completion once initiated. [3AR Chapter 4, Appendix A, Section 2.6.2.3]