

March 26, 2009

Mr. Dealis W. Gwyn, Licensing Manager  
Shaw AREVA MOX Services  
P.O. Box 7097  
Aiken, SC 29804-7097

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION REGARDING THE  
MANAGEMENT MEASURES DESCRIBED IN THE LICENSE APPLICATION  
AND INTEGRATED SAFETY ANALYSIS SUMMARY FOR THE MIXED OXIDE  
FUEL FABRICATION FACILITY

Dear Mr. Gwyn:

We have reviewed the management measures information in your license application submittal, dated November 17, 2006, and the integrated safety analysis summary dated September 27, 2006, as revised on December 17, 2007. The submittal requests a license to possess and use special nuclear, source, and by-product material in the Mixed Oxide (MOX) Fuel Fabrication Facility (MFFF). The MFFF, which is to be located on the U.S. Department of Energy's (DOE's) Savannah River Site in Aiken, South Carolina, will process and fabricate MOX fuel for use in commercial nuclear power plants as part of the DOE's plutonium disposition program.

We have enclosed a list of additional information that is needed by the staff in order to complete the review of the management measure for the MFFF. Please provide us with a response describing how our questions were addressed and any other changes to licensing documents that were necessary to incorporate the response. The response should be provided within 90 days of the date of this letter.

In accordance to the Title 10 *Code of Federal Regulations* 2.390 of the U.S. Nuclear Regulatory Commission's (NRC's) "Rules of Practice," a copy of this letter will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records component of NRC's Agencywide Documents Access and Management System (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

D.Gwyn

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Please contact me at (301) 492-3130 if you have any questions.

Sincerely,

**/RA/**

Kevin Morrissey, Project Manager  
Division of Fuel Cycle Safety  
and Safeguards  
Office of Nuclear Material Safety  
and Safeguards

Docket: 70-3098

Enclosure: As stated

cc w/enclosure:

S. Glenn, NNSA/SRS  
J. Olencz, DOE  
S. Jenkins, SC Dept. of HEC  
D. Curran, Esq., NWS

A.J. Eggenberger, DNFSB  
L. Zeller, BREDL  
G. Carroll, NWS  
D. Silverman, Esq.

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**Mixed Oxide Fuel Fabrication Facility  
Request for Additional Information for the Management  
Measures Review of the License Application and ISA Summary**

Configuration Management

1. In Chapter 15, Section 15.2.1 of the license application (LA) you commit to apply configuration management to “maintain effective control of the MFFF as-designed and as-built arrangement and operation.” However, some commitments discussed in Section 15.2 are not consistent with those presented in the MOX Fuel Fabrication Facility Configuration Management Plan (CMP). Revise Section 15.2 of the LA to address the commitments regarding how the organization(s) responsible for construction, operation, maintenance, modification, testing and decommissioning of the facility will implement the CMP. Revise Section 15.2 of the LA to commit to management support for CM. Consistent with the information in the CMP, provide the definitions for key terminology.

10 CFR 70.72(a) “Facility changes and change process” requires each licensee to establish a configuration management system to evaluate, implement, and track each change to the site, structures, processes, systems, equipment, components, computer programs and activities of personnel.

2. In Section 15.2.6.2 of the LA you state that “a technical review allows for evaluation of safety, environmental as well as the identification of affected SSCs and facility documentation.” Clarify the description of the configuration review process to describe the evaluation of the changes to the technical basis of SSCs.

10 CFR 70.72(a)(1) “Facility changes and change process” requires the configuration system to be documented in written procedures and that the process assure that the technical basis for the change is evaluated.

3. Section 15.2.6.2 of the LA does not address how the configuration management system will track changes to site systems, equipment, components, processes, systems, computer programs, and activities of personnel. Describe how the configuration management system evaluates, implements, and tracks changes to site systems, equipment, components, processes, computer programs, and activities of personnel.

10 CFR 70.72(a) “Facility changes and change process” requires each licensee to establish a configuration management system to evaluate, implement, and track each change to the site, structures, processes, systems, equipment, components, computer programs and activities of personnel.

4. Clarify in Section 15.2 of the LA how the work control processes ensure that work activities are performed correctly and the CM is maintained for documents, procedures, and the physical configuration of the facility.

10 CFR 70.72(a) “Facility changes and change process” requires each licensee to establish a configuration management system to evaluate, implement, and track each change to the site, structures, processes, systems, equipment, components, computer programs and activities of personnel.

Enclosure

5. A “graded approach” is a process of ensuring that the level of analysis, documentation, and actions used to comply with a requirement are commensurate with:
- the relative importance to safety, safeguards, and security;
  - the magnitude of any hazard involved;
  - the life cycle stage of a facility;
  - the programmatic mission of a facility;
  - the particular circumstances of a facility;
  - the relative importance of radiological and non-radiological hazards; and
  - other relative hazards

Describe in Section 15.2 of the LA how the graded application of management measures applied to the safety program is used to demonstrate compliance to the performance requirements of 10 CFR 70.61. Additionally, describe how the graded approach is applied to the most important equipment or to scenarios which could potentially have serious off-site personnel safety consequences. Discuss how management resources are applied in the CM program for systems that prevent, detect, or mitigate consequences of accidents.

10 CFR 70.62(a)(1) states that each licensee or applicant shall establish and maintain a safety program that demonstrates compliance with the performance requirements of §70.61. The safety program may be graded commensurate with the reduction of risks attributable to that item.

6. Describe the specific measures taken to eliminate or minimize redundant facility configuration information particularly during modifications to structures, systems, and components.

10 CFR 70.72(a) “Facility changes and change process” requires each licensee to establish a configuration management system to evaluate, implement, and track each change to the site, structures, processes, systems, equipment, components, computer programs and activities of personnel. Additionally, 10 CFR 70.72(a)(6) further states that the impacts or modifications to the integrated safety analysis, integrated safety analysis summary, or other safety program information, shall be developed in accordance with §70.62.

7. Describe how the configuration management program objectives incorporate facility configuration information and the elements required to maintain operational configuration.

10 CFR 70.72 require the establishment of a configuration management system that will evaluate, implement and track each change to the site, structures, processes, systems, equipment, components, computer programs and activities of personnel.

8. Describe the commitments to comply with recognized consensus codes and standards for software acquisition and management.

10 CFR 70.64(a)(1) states that the design must be developed and implemented in accordance with management measures to provide adequate assurance that items relied on for safety will be available and reliable to perform their function when needed.

Additionally, 10 CFR 70.72 requires the establishment of a configuration management system that will evaluate, implement and track each change to the site, structures, processes, systems, equipment, components, computer programs and activities of personnel.

9. Explain in Section 15.2 of the LA how the configuration management system is used to evaluate facility changes that may alter the parameters of an accident sequence evaluated in ISA as required by 10 CFR 70.72(d)(1).

10 CFR 70.72(d)(1) states that for changes that require approval under §70.72, the licensee shall submit an amendment request to the NRC in accordance with §70.34 and §70.65.

10. Section 5.1.3 of the LA states that “management measures supplement IROFS by providing the administrative and programmatic framework for these measures.” Clarify the meaning of “supplemental” to be consistent with the definition of management measures in 10 CFR 70.4.

10 CFR 70.4 states that management measures mean the functions performed by the licensee, generally on a continuing basis that are applied to items relied on for safety.

#### Maintenance

11. Describe in Section 15.3 of the LA the programmatic elements of the maintenance program. Provide a description of the methods used for planning and implementing repairs to IROFS (corrective maintenance), preplanned or periodic maintenance (preventive maintenance), performance monitoring (surveillance/monitoring), and post maintenance testing (functional testing).

10 CFR 70.64(a)(8) states that the design of items relied on for safety must provide for adequate inspection, testing, and maintenance, to ensure their availability and reliability to perform their function when needed.

10 CFR 70.62(3)(d) states in part that management measures shall ensure that engineered and administrative controls and control systems that are identified as IROFS pursuant to §70.61(e) are designed, implemented and maintained as necessary, to ensure they are available and reliable to perform their function when needed, to comply with the performance requirements of §70.61.

12. Revise Section 15.3.1.1 of the LA to describe the organization that is responsible for the surveillance and monitoring functions that will occur during operation and maintenance. In Section 15.3.1.1 of the LA describe and commit to conducting surveillance/monitoring at specified frequencies to measure the degree to which safety functions or safety controls meet performance specifications.

10 CFR 70.62(3)(d) states in part that management measures shall ensure that engineered and administrative controls and control systems that are identified as items relied on for safety pursuant to §70.61(e) are designed, implemented and maintained as

necessary, to ensure they are available and reliable to perform their function when needed to comply with the performance requirements of §70.61.

13. Describe in Section 15.3.1.1 of the LA how surveillance/monitoring are used in setting preventive maintenance frequencies and determining performance trends for IROFS.

10 CFR 70.62(a)(1) states that each licensee or applicant shall establish and maintain a safety program that demonstrates compliance with the performance requirements of §70.61.

14. Describe in Section 15.3.1.1 of the LA how the results derived from incident investigations and identified root causes are used to modify the affected maintenance function and eliminate or minimize the root cause from recurring.

10 CFR 70.62(a)(1) states that each licensee or applicant shall establish and maintain a safety program that demonstrates compliance with the performance requirements of §70.61.

15. Revise Section 15.3.1.2 of the LA to describe the objectives of the preventative maintenance function. Explain how the preventative maintenance function will provide reasonable assurance of the reliability and availability of IROFS.

10 CFR 70.64(a)(8) states that the design of items relied on for safety must provide for adequate inspection, testing, and maintenance, to ensure their availability and reliability to perform their function when needed.

10 CFR 70.62(3)(d) states in part that management measures shall ensure that engineered and administrative controls and control systems that are identified as items relied on for safety pursuant to §70.61(e) are designed, implemented and maintained as necessary, to ensure they are “available and reliable” to perform their function when needed, to comply with the performance requirements of 70.61.

16. Describe how the results of surveillance monitoring and instrumentation calibration are used in the evaluation of preventative maintenance intervals.

10 CFR 70.64(a)(8) states that the design of items relied on for safety must provide for adequate inspection, testing, and maintenance, to ensure their availability and reliability to perform their function when needed.

10 CFR 70.64(a)(10) states that the design must provide for inclusion of instrumentation and control systems to monitor and control the behavior of items relied on for safety.

17. Revise Section 15.3.1.3 of the LA to describe the criteria for determining the frequency for conducting corrective maintenance of IROFS.

10 CFR 70.64(a)(8) states that the design of items relied on for safety must provide for adequate inspection, testing, and maintenance, to ensure their availability and reliability to perform their function when needed. Additionally, 10 CFR 70.62(3)(d) states in part that management measures shall ensure that engineered and administrative controls

and control systems that are identified as items relied on for safety pursuant to §70.61(e) are designed, implemented and maintained as necessary to ensure they are available and reliable to perform their function when needed to comply with the performance requirements of §70.61.

18. Section 15.3.1.4 of the LA does not describe the commitments associated with functional testing program. Commit to evaluate the results of post-maintenance testing and the functional testing of IROFS after corrective or preventive maintenance or calibration. Describe how functional tests are used as a surveillance technique and the applicability of the tests to assure performance of the IROFS.

10 CFR 70.64(a)(8) states that the design of items relied on for safety must provide for adequate inspection, testing, and maintenance to ensure their availability and reliability to perform their function when needed.

10 CFR 70.62(3)(d) states in part that management measures shall ensure that engineered and administrative controls and control systems that are identified as items relied on for safety pursuant to §70.61(e) are designed, implemented and maintained as necessary to ensure they are available and reliable to perform their function when needed to comply with the performance requirements of §70.61.

19. Revise Section 15.3.2. of the LA to provide a general description of maintenance-related work control methods. Describe how those methods are applied in a structured work control program.

10 CFR 70.64(a)(8) states that the design of items relied on for safety must provide for adequate inspection, testing, and maintenance, to ensure their availability and reliability to perform their function when needed.

10 CFR 70.62(3)(d) states in part that management measures shall ensure that engineered and administrative controls and control systems that are identified as items relied on for safety pursuant to §70.61(e) are designed, implemented and maintained as necessary to ensure they are available and reliable to perform their function when needed to comply with the performance requirements of §70.61.

20. Revise Section 15.3.3 of the LA to provide a discussion of how the maintenance function uses, interfaces, and is linked to the other seven management measures.

10 CFR 70.62(3)(d) states in part that management measures shall ensure that engineered and administrative controls and control systems that are identified as items relied on for safety pursuant to §70.61(e) are designed, implemented and maintained as necessary to ensure they are available and reliable to perform their function when needed to comply with the performance requirements of §70.61.

21. Are audits or assessments conducted for the maintenance function? Revise Chapter 15.3.1 of the LA, as necessary, to describe how and when audits or assessments of the maintenance function are conducted.

10 CFR 70.64(a)(8) states that the design of items relied on for safety must provide for



adequate inspection, testing, and maintenance to ensure their availability and reliability to perform their function when needed.

### Training and Qualification

22. Revise Section 15.4 of the LA to describe the requirements for training and qualification of all personnel.

10 CFR 70.22 states that each application for a license shall contain the technical qualifications, including training and experience of the applicant and members of his staff that engage in the proposed activities in accordance with the regulations.

23. Revise Section 15.4 of the LA to include a description of the process used for training and qualification of all personnel.

10 CFR 70.22 states that each application for a license shall contain the technical qualifications, including training and experience of the applicant and members of his staff that engage in the proposed activities in accordance with the regulations.

24. Revise Section 15.4.3 of the LA to describe or reference the commitments to radiation training requirements. Address the commitments as they relate to training and qualification for the standards specified in "ALARA, ASTM –C986, Developing Training Programs for the Nuclear Fuel Cycle, ASTM E1168, Standard Guide for Radiological Protection Training for Nuclear Facility Workers, and NRC Regulatory Guide 8.10, Operating Philosophy for Maintaining Occupational Radiation Exposures as Low as is Reasonably Achievable."

10 CFR 70.22 states that each application for a license shall contain the technical qualifications, including training and experience of the applicant and members of his staff that engage in the proposed activities in accordance with the regulations.

25. Revise Section 15.4.1 of the LA to describe or reference the training process used to incorporate results from the human factor engineering analysis IROFS for startup, operation, maintenance, and modification to the facility.

10 CFR 70.22 states that each application for a license shall contain the technical qualifications, including training and experience of the applicant and members of his staff that engage in the proposed activities in accordance with the regulations.

26. Describe or reference in Section 15.4.1 of the LA how the training and qualification program is applied to administrative IROFS. In addition, provide specific commitments on required training for positions or performance activities associated with IROFS. Describe the requirements for the performance training process that is applicable for working with processes that are relied on for safety. Further, state the objectives of the training and describe the training criteria and personnel who will be providing the training or retraining.

10 CFR 70.22 states that each application for a license shall contain the technical qualifications, including training and experience of the applicant and members of his

staff

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that engage in the proposed activities in accordance with the regulations.

27. Revise Section 15.4.1 of the LA to describe the relationship between job functions and training requirements. Describe the requirements for responsibility, authority, and accountability of personnel involved in managing, supervising and implementing training. Describe and commit to performance based training as the primary method for analyzing, designing, developing, conducting, and evaluating training.

10 CFR 70.22 states that each application for a license shall contain the technical qualifications, including training and experience of the applicant and members of his staff that engage in the proposed activities in accordance with the regulations.

28. Revise Section 15.4.1 of the LA to expand on the discussion of how training documents are linked to the configuration management system and how training documents will provide reasonable assurance that the design change and plant modification process are included in the training.

10 CFR 70.22 states that each application for a license shall contain the technical qualifications, including training and experience of the applicant and members of his staff that engage in the proposed activities in accordance with the regulations.

29. Revise Section 15.4.1 of the LA to describe the process for managing and maintaining individual training information. If the training and qualification program information is maintained by an automated database, describe how the database is maintained.

10 CFR 70.22 states that each application for a license shall contain the technical qualifications, including training and experience of the applicant and members of his staff that engage in the proposed activities in accordance with the regulations.

10 CFR 70.62(3) requires that records of IROFS failures be kept and updated. Provide a description of how this information will be collected and maintained.

10 CFR 70.22 states that each application for a license shall contain the technical qualifications, including training and experience of the applicant and members of his staff that engage in the proposed activities in accordance with the regulations.

30. Revise Section 15.4.2 of the LA to describe how the need for training is evaluated and how the functional areas requiring training and qualification are identified.

10 CFR 70.22 states that each application for a license shall contain the technical qualifications, including training and experience of the applicant and members of his staff that engage in the proposed activities in accordance with the regulations.

31. Revise Section 15.4.4 of the LA to describe process for determining the training content for individual training requirements. Describe how training content is established through needs/job analysis and position description requirements.

10 CFR 70.22 states that each application for a license shall contain the technical

qualifications, including training and experience of the applicant and members of his staff

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that engage in the proposed activities in accordance with the regulations.

32. Revise Section 15.4.4 of the LA to describe the requirements for the knowledge, skills, and abilities that a trainee is required to demonstrate; the conditions under which required actions will take place; and, the standards of performance the trainee is required to achieve at the completion of the training activity. Additionally, revise Section 15.4.4 of the LA to describe and define the review and approval requirements for plans/guides and other training materials before inclusion in the training program requirements and use.

10 CFR 70.22 states that each application for a license shall contain the technical qualifications, including training and experience of the applicant and members of his staff that engage in the proposed activities in accordance with the regulations.

33. Revise Section 15.4.5 of the LA to describe how lesson plans and guides are used in classroom training and on-the-job training. Describe the plans/guides used for classroom training and on-the-job training and describe the criteria used for evaluating acceptable trainee performance.

10 CFR 70.22 states that each application for a license shall contain the technical qualifications, including training and experience of the applicant and members of his staff that engage in the proposed activities in accordance with the regulations.

34. Revise Section 15.4.7 of the LA to clarify the commitment for conducting on-the-job training for activities that are safety related. Describe how on-the-job training is organized to include the use of performance-based training materials. Describe the training requirements for conducting on-the-job training.

10 CFR 70.22 states that each application for a license shall contain the technical qualifications, including training and experience of the applicant and members of his staff that engage in the proposed activities in accordance with the regulations.

35. Revise Section 15.4.8 of the LA to describe and commit to the process for performing periodic evaluations of individual training programs by qualified individuals to identify program strengths and weaknesses.

10 CFR 70.22 states that each application for a license shall contain the technical qualifications, including training and experience of the applicant and members of his staff that engage in the proposed activities in accordance with the regulations.

36. Revise Section 15.4.8 of the LA to describe how improvements and changes to the training program are systematically initiated, evaluated, tracked, and incorporated to correct training deficiencies and performance problems.

10 CFR 70.22 states that each application for a license shall contain the technical qualifications, including training and experience of the applicant and members of his staff that engage in the proposed activities in accordance with the regulations.

37. Revise Section 15.4.9 and Section 15.4.2 of the LA to describe the minimum qualification requirements for technical personnel.

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10 CFR 70.22 states that each application for a license shall contain the technical qualifications, including training and experience of the applicant and members of his staff that engage in the proposed activities in accordance with the regulations.

#### Plant Procedures

38. Revise Section 15.5 of the LA to describe the program commitments for developing written procedures used to control facility operations and IROFS

10 CFR 70.22 states each application for a license shall contain proposed procedures to protect health and minimize danger to life or property.

39. Revise Section 15.5 of the LA to describe the plant procedure identification process for when plant procedures are needed based on the results derived from the ISA or changes in ISA results.

10 CFR 70.22 states each application for a license shall contain proposed procedures to protect health and minimize danger to life or property.

40. Revise Section 15.5 of the LA to describe the elements of procedure validation and commit to a method that validates procedures through field tests or other appropriate methods.

10 CFR 70.22 states each application for a license shall contain proposed procedures to protect health and minimize danger to life or property.

41. Describe in Section 15.5 of the LA the program and methods for identifying, developing, approving, implementing, and controlling plant procedures through the quality assurance and configuration management programs. Clarify the mechanisms that will ensure that current procedures are readily accessible by all personnel and are used to control work.

10 CFR 70.22 states each application for a license shall contain proposed procedures to protect health and minimize danger to life or property.

42. Revise Section 15.5.1.2.3 of the LA to describe the elements of the procedure for dealing with incidents and commit to review all applicable written procedures following an accident, unexpected transient, significant operator error, or equipment malfunction.

NUREG 1718, Section 15.5.4.3.H, provides guidelines for conducting a review of all applicable written plant procedures following an incident and is an acceptable approach for complying with regulatory requirements.

43. Describe in Section 15.5.1.1 of the LA the methods for performing procedure reviews and commit to a procedure review frequency not exceeding 5 years. This commitment should be used to ensure the accuracy of administrative and operational procedures

described in Sections 15.5.1.1 and 15.5.1.2. In addition, identify the organization responsible for verification of the accuracy of administrative and operating procedures.

NUREG 1718, Section 15.5.4.3.O, provides guidance for conducting periodic reviews of

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plant procedures to ensure their continued accuracy and usefulness and is an acceptable approach for complying with regulatory requirements.

44.      Revise Section 15.5 of the LA to provide a description of the test control program, including commissioning and preoperational tests. Describe the elements of plant procedures for test control and the criteria for determining when tests are required or how and when testing activities are performed.

10 CFR 70.64(a)(8) states that new facilities must address inspection, testing and maintenance. The design of items relied on for safety must provide for adequate inspection, testing and maintenance to ensure their availability and reliability to perform their function when needed.

45.      Revise Section 15.5.1.2.2 of the LA to describe the functional elements of plant procedures for maintenance involving IROFS. Discuss corrective and preventive maintenance, functional testing after maintenance and surveillance/monitoring of maintenance activities and include commitments to:
- Control of work by comprehensive facility procedures to be followed by maintenance technicians;
  - Pre-maintenance activities including pre-job briefs and reviews of maintenance procedures to verify accuracy and completeness;
  - Steps that require notification of all affected parties (operators and supervisors) prior to commencement of maintenance and upon completion; and
  - Control of work by comprehensive maintenance procedures.

10 CFR 70.64(a)(8) states that new facilities must address inspection, testing and maintenance. The design of items relied on for safety must provide for adequate inspection, testing and maintenance to ensure their availability and reliability to perform their function when needed.

#### Audits and Assessments

46.      Revise Section 15.6 of the LA to describe the major program elements and objectives for conducting audits and assessments. Specify commitments for performance of audits and assessments as described in NUREG-1718, Section 15.6.4.3A (i) – (xiii), or propose an acceptable alternative.

NUREG 1718, Section 15.6.4.3.A.ii, describes guidance for performing assessments. This guidance recommends that the applicant describe the performance of assessments in all areas where the requirements for QA and other management measures are applicable.

#### Incident Investigations

47. Revise Section 15.7.2 of the LA by describing commitments for investigation of incidents.

Describe commitments for determining the root cause(s) of the incident and any generic implications and corrective actions. In addition, describe how the two program functions of incident investigation and corrective action interface with each other.

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NUREG 1718, Section 15.7.4.3.A(i) – (iii), describes acceptable guidance for the prompt investigation of incidents.

48. NUREG 1718, Section 15.7.4.3.A(ii), provides guidelines for monitoring and documenting corrective action effectiveness. Revise Section 15.7.2 of the LA to describe how corrective action effectiveness is monitored and documented through completion. Provide commitments consistent with the NUREG or propose an acceptable alternative.
49. Describe in Sections 15.7.1 and 15.7.2 of the LA how the maintenance of documentation is applied to lessons learned and future operations of the facility. Describe actions taken to assure that the accidents sequences considered the ISA include evaluation of risks associated with accidents of the type actually experienced.

10 CFR 70.62(d) states that each applicant shall establish management measures to provide continuing assurance of compliance with performance requirements of §70.61.

50. Revise Section 15.7.2 of the LA to describe the process for conducting incident investigations and include the following elements:
- Overall method for investigating incidents which is separate from any required emergency plan (i.e., reasonable, systematic, and structured approach should be used to determine the root cause of incidents and the level of investigation should be graded relative to severity of the incident);
  - Functions, responsibility and scope of authority of investigation teams;
  - Minimum qualifications of investigation team members (i.e., each team should include at least one process expert and one team member trained in root cause analysis);
  - Independence of the investigation process and team members (i.e., the investigation process and the team members should be independent from the line function(s) involved with the incident under investigation and participants should be assured of protection from retribution for participating in investigations);
  - Maintenance of auditable records and documentation related to incidents, investigations, and root cause analysis;
  - For each incident, preparation of a report that includes a description of the incident, contributing factors, root cause analysis, findings and recommendations;
  - Commitments that relevant findings are reviewed with all affected personnel, and reports are made available to NRC upon request;
  - Documented corrective actions are taken within a reasonable period to resolve findings from incident investigations.

NUREG 1718, Section 15.7.4.3.B.(i) – (viii), describes acceptable guidance to establish and use a plan for investigating incidents and may be followed or an acceptable alternative can be proposed.

### Records Management

51. Revise Section 15.8 of the LA to describe the records management program objectives, particularly with regard to classified records.

NUREG 1718, Section 15.8.3.B, describes acceptable guidance for handling and storage

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of classified records. Follow the guidance described in the NUREG or propose an acceptable alternative.

52. Revise Section 15.8 of the LA to describe or reference the requirements for records management that relate to 10 CFR Part 19, Notices, Instructions, and Reports to Workers: Inspection and Investigations, 10 CFR Part 20, Standards for Protection Against Radiation, and 10 CFR Part 21, Reporting Defects and Noncompliance.

NUREG 1718, Section 15.8.4.1.A - D, provides guidance for records management and may be used or an acceptable alternative may be proposed.

53. Describe in Section 15.8 of the LA, the commitments that address the updating in the records management system.

NUREG 1718, Section 15.8.4.3.E, describes guidance and acceptable elements for updating the facility records management system to reflect any changes in the license application between the construction approval review and the review for a license to possess and use special nuclear material. This guidance may be followed or an acceptable alternative may be proposed

54. Revise Section 15.8 of the LA to describe how records are categorized. Specify which records require controlled access and the procedures used to ensure the records management system remains effective.

10 CFR 70.62(d) states that each applicant shall establish management measures to provide continuing assurance of compliance with performance requirements of §70.61.

55. Describe the process for maintaining records of computer codes/computerized data relied on for safety that are used for maintaining readability and usability of older codes and data as computing technology changes

10 CFR 70.72(a) states that the licensee shall establish a configuration management system to evaluate, implement, and track each change to the site, structures, procedures, systems, equipment, components, computer programs and activities of personnel.

56. Revise Section 15.8 of the LA to describe the requirements for identifying, storing and protecting quality affecting records.

10 CFR 70.64(a)(1) states that the design must be developed and implemented in accordance with management measures, to provide adequate assurance that items relied on for safety will be available and reliable to perform their function when needed. Appropriate records of these items must be maintained by or under the control of the licensee throughout the life of the facility.

#### Quality Assurance

57. Revise Section 15.1 of the LA to describe and commit to update the MOX Project Quality Assurance Plan for start-up testing, operations and decommissioning.

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10 CFR 70.22(f) states in part, that each application for a license to possess and use special nuclear material in a plutonium processing and fuel fabrication plant shall contain, in addition to other information required a description of the quality assurance program to be applied to the design, fabrication, construction, testing, and operation of the structures, systems, and components of the plant.

#### Integrated Safety Analysis (Chapter 5)

58. Revise LA Section 5.2.2.7 of the LA to describe how management measures are applied to individual IROFS.

10 CFR 70.62(2)(d) states that each applicant shall establish management measures to ensure compliance with the performance requirements of §70.61. The measures applied to a particular engineered or administrative control system may be graded commensurate with the reduction of risk attributable to that control or control system. The management measures shall assure that the engineered and administrative controls and control systems that are identified as items relied on for safety pursuant to §70.61(e) are designed implemented and maintained as necessary to ensure they are available and reliable to perform their safety function when needed.

59. Revise LA Section 5.2.2.7 of the LA to describe how IROFS failure mechanisms will be Evaluated and assessed for the impact on reliability and availability.

10 CFR 70.62(3) states that each applicant shall maintain records of IROFS failures readily retrievable and available for NRC inspection, documenting each discovery that an item relied on for safety or management measure has failed to perform its function upon demand or has degraded such that the performance requirements of §70.61 are not satisfied.



