



U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555

DCS-NRC-000373
12 May 2014

Subject: Docket Number 070-03098
Shaw AREVA MOX Services
Mixed Oxide Fuel Fabrication Facility
Request for Extension of Construction Authorization (CAMOX-001)

Shaw AREVA MOX Services, LLC (MOX Services) hereby requests that the U.S. Nuclear Regulatory Commission (NRC) extend the expiration date for Construction Authorization CAMOX-001 an additional 10 years, from March 30, 2015 to March 30, 2025, in order to bound completion of construction of the Mixed Oxide Fuel Fabrication Facility (MFFF). MOX Services makes this request in accordance with Paragraph 5 of CAMOX-001 Rev 3, which permits the Director of the Office of Nuclear Material Safety and Safeguards to, in writing and for good cause shown by MOX Services, extend the Construction Authorization.

Status

Under the authorizations within CAMOX-001 Rev 3, MOX Services has made substantial progress in the construction of the MFFF with overall construction status in excess of 60 percent complete. Significant progress has been made in construction of Principal Structures, Systems, and Components (PSSCs) and other non-PSSCs. For example, the MOX Fuel Fabrication Building (PSSC-036) is substantially complete, including roof and exterior structure, with only Temporary Construction Openings remaining. More than 200,000 pounds of HVAC ductwork (PSSC-004, -005, -006, -041, -050) has been installed. Seventy of 73 tanks have been installed (PSSC-003, -009, -010, -023, -041, 043, -045). Approximately 20 gloveboxes (PSSC-024) have been installed. Installation of approximately 1000 fire dampers (PSSC-021) has commenced. These PSSC activities have been completed in accordance with MOX Services' NRC approved Quality Assurance Plan. Construction activities that are not related to PSSCs include completion of the Administration Building, Technical Support Building, Craft Support Building, and Secured Warehouse as well as the installation of more than 70,000 linear feet of non-PSSC electrical cable. In addition, MOX Services has completed in-advance testing of 27 process units.

Remaining Construction

While significant progress has been made, additional time is required for completion of construction. Key structures remaining to be constructed include the Emergency Generator Building (PSSC-016) and the Reagents Processing Building (non-PSSC). Other key PSSC related construction activities remaining include completing installation of ventilation systems (PSSC-004, -005, -006, -041, -050) – including fire dampers (PSSC-021), fire detection and suppression system (PSSC-022), diesel generator and support systems (PSSC-012, -017, -018), process units (various PSSCs), and gloveboxes (PSSC-024). These activities are authorized under CAMOX-001 Rev 3 and will be constructed in accordance with the MOX Project Quality Assurance Plan (MPQAP).

Basis for Extension (Good Cause)

There are various factors that have contributed to the need for an extension of CAMOX-001 Rev 3. These factors include

- The MOX facility is a unique, first-of-a-kind facility and the first facility of this type to be licensed in the United States under 10CFR70.
- Annual funding/appropriations supporting construction activities have been less than the projected funding profile for several years.
- Exacting requirements of nuclear procurements coupled with a shortage of qualified (10CFR50 Appendix B) vendors have resulted in delayed delivery of components.
- Shortage of, and increased regional demand for, qualified construction workers have resulted in longer durations for key construction activities.
- Two-year delay between issuance of the NRC Construction Authorization and the start of nuclear construction.

The NRC's 2005 Final Environmental Impact Statement (NUREG-1767) and the MOX Services Environmental Report, Revision 5, concluded that no adverse environmental impacts would be expected as a result of construction and operation of the MFFF. MOX Services has concluded that activities conducted to date are still bounded by the MOX Services Environmental Report. The extension of the Construction Authorization completion date would not authorize or result in changes of significance as defined in 10 CFR § 51.60(b)(2).

The NRC Staff has issued its Safety Evaluation Report (SER) concluding that facility operation does not pose an undue risk to worker and public health and safety. Since the extension of the Construction Authorization would not authorize any new activities, the conclusions of the NRC SER remain valid.

Requested Change and Summary of Basis

The only modification requested to CAMOX-001 is the extension of the expiration date to March 30, 2025. Since the completion of construction is highly dependent upon annual congressional funding, the requested extension date bounds the actual time MOX Services will require to complete construction of the MFFF. MOX Services will continue to keep the NRC informed of construction progress through our normal interactions. These interactions will keep the NRC abreast of the latest expected construction complete date. As discussed previously, the extension would not allow performance of any work not previously authorized by the existing Construction Authorization.

In view of the above, and pursuant to Paragraph 5 of CAMOX-001, MOX Services requests that the NRC extend the MFFF Construction Authorization expiration date to March 30, 2025. MOX Services submits that good cause exists for the requested extension.

If you have any questions, please feel free to contact me at (803) 819-2156 or Dealis Gwyn, Licensing and Nuclear Safety Manager, at (803) 819-2780.

Sincerely,



Kelly D. Trice
President and COO

cc:

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