



Nuclear Fuel Services, Inc.
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AIRBORNE EXPRESS

21G-02-0268
GOV-01-55-04
ACF-02-0197

August 23, 2002

Director
Office of Nuclear Material Safety and Safeguards
U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555

- References:
- 1) Docket No. 70-143; SNM License 124
 - 2) Letter from B.M. Moore to NRC, License Amendment Request to Support the Uranyl Nitrate Building at the BLEU Complex, dated February 28, 2002 (21G-02-0051)
 - 3) NRC Integrated Safety Assessment On-Site Review at Nuclear Fuel Services, Erwin, Tennessee Site, June 11-13, 2002
 - 4) Letter from NRC to B.M. Moore, Nuclear Fuel Services, Inc. (TAC L31599) Uranyl Nitrate Building License Amendment Application and Integrated Safety Assessment On-Site Review, June 11-13, 2002, dated July 11, 2002

Subject: Revised Integrated Safety Analysis Summary for Uranyl Nitrate Building

Dear Sir:

Nuclear Fuel Services, Inc. (NFS) hereby submits a revised Integrated Safety Analysis (ISA) Summary for the Uranyl Nitrate Building (UNB) to support the license amendment request described in Reference 2. The revised ISA Summary contained herein addresses each of the issues raised by your staff at the referenced on-site meeting and documented in Reference 4. To assist in your review, NFS has prepared a cross-walk (Attachment III) that correlates the "Punch List" items specified in Reference 4, to the associated safety basis documents where these issues are addressed. Additional information is contained in Attachment IV to exemplify the bounding calculations that were performed for all accident sequences considered in the Process Hazards Analysis that may potentially affect workers located at the UNB.

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Measures and commitments needed to demonstrate compliance with Title 10, Code of Federal Regulations (CFR), Part 70.64 *Requirements for New Facilities or New Processes at Existing Facilities* are specifically addressed in the ISA Summary, Appendix A, contained herein. In addition, NFS commits to establish and maintain records that demonstrate compliance with 10 CFR 70.62 *Safety Program and Integrated Safety Analysis* requirements. As such, applicable sections in the ISA Summary specify the records-keeping requirements for the management measures that will be implemented to maintain Items Relied On For Safety (IROFS) reliable. The current licensing requirements (SNM-124, Section 2.11.2) needed to maintain IROFS reliable are addressed in the ISA Summary to reflect discussions with your staff.

No changes are necessary to Chapter 1 of the referenced license with respect to the requirements specified in 10 CFR 70.22(a)(1).

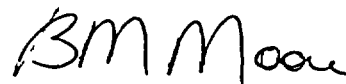
No page changes to the referenced license were needed to support this submittal.

Much of the information contained herein is considered to be proprietary information and is to be withheld from public disclosure as specified in 10 CFR 2.790. The documents contained herewith (Attachments I and II) are being submitted to the NRC for docketing in the NFS Erwin License Docket 70-143 (SNM-124). Attachment I contains NFS proprietary information, as set forth in the enclosed affidavit. Attachment II is the same document with the proprietary information deleted; therefore, it is not a proprietary document and may be released for public disclosure.

If you or your staff have any questions, require additional information, or wish to discuss this, please contact me, or Mr. Rik Droke, Licensing and Compliance Director at (423) 743-1741. Please reference our unique document identification number (21G-02-0268) in any correspondence concerning this letter.

Sincerely,

NUCLEAR FUEL SERVICES, INC.

A handwritten signature in black ink, appearing to read "Bm Moore".

B. Marie Moore
Vice President
Safety and Regulatory

JSK/lsn

B. M. Moore to Director, NMSS
Page 3
August 23, 2002

21G-02-0268
GOV-01-55-04
ACF-02-0197

cc:

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ENCLOSURE

AFFIDAVIT

I, **B. Marie Moore**, Vice President of Safety and Regulatory at Nuclear Fuel Services, Inc. (NFS), make the following representations that to the best of my knowledge and beliefs:

1. The following document which Nuclear Fuel Services, Inc. (NFS) wishes to have withheld from public disclosure, is:

*Attachment I to NFS letter B. M. Moore to Director, NMSS,
dated August 23, 2002 (21G-02-0268), in its entirety.*

2. The information contained in the document cited in 1 above has been held in confidence by Nuclear Fuel Services, Inc. (NFS) in that it is of a privileged and confidential commercial nature.
3. The information contained in the document cited in 1 above is the intellectual property of Nuclear Fuel Services, Inc. (NFS) and as such is customarily held in confidence by Nuclear Fuel Services, Inc. (NFS). Nuclear Fuel Services, Inc. (NFS) has customarily submitted privileged and confidential information of this type to the Nuclear Regulatory Commission (NRC) and to its predecessor, the Atomic Energy Commission (AEC), in confidence.
4. The information contained in the document cited in 1 above has not been made available to public sources by Nuclear Fuel Services, Inc. (NFS), nor has Nuclear Fuel Services, Inc. (NFS) authorized that it be made available.
5. The public disclosure of the information contained in the document cited in 1 above is likely to cause substantial economic harm to Nuclear Fuel Services, Inc. (NFS).

BMM Moore 8/23/02
B. Marie Moore Date
Vice President
Safety and Regulatory

I certify the above named person appeared before me and executed this document on this the 22nd day of August, 2002.

Dandra L. White
Notary Public

My commission expires: 4/5/03



Attachment I

ISA Summary (*Proprietary Version*)