

Nuclear Fuel Services, Inc.
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DHL EXPRESS

21G-04-0060
GOV-01-55-04
ACF-04-0124

April 30, 2004

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 for Oxide Conversion Building and Effluent Processing Building at the BLEU Complex, dated October 23, 2003 (21G-03-0277)
 - 3) Letter from B.M. Moore to NRC, Commitment Letter to Address NRC Licensing Review Questions Pertaining to Fire Safety for the OCB and EPB, dated March 18, 2004 (21G-04-0046)
 - 4) Letter from NRC to B.M. Moore, Nuclear Fuel Services, Inc., Oxide Conversion Building and Effluent Processing Building Request for Additional Information (TAC L31791), dated March 31, 2004

Subject: NFS Response to Request for Additional Information for Oxide Conversion Building and Effluent Processing Building at the BLEU Complex

Dear Sir:

Nuclear Fuel Services, Inc. (NFS) hereby submits responses to the Request for Additional Information (RAI) pertaining to the referenced licensing action for the Oxide Conversion Building and Effluent Processing Building at the BLEU Complex.

In addition, NFS committed to revise Table 10.1 of the referenced license as specified in Reference 3. To fulfill this commitment, Table 10.1 of SNM-124 has been revised and is included as Attachment 1.

Please replace the corresponding page in the October 23, 2003 submittal (Reference 2). The NFS Safety and Safeguards Review Council has reviewed and approved these changes. For your convenience, vertical lines in the right-hand margin of the affected license page denote changes.

NM5501

The RAI responses (contained in Attachment 2) are considered proprietary information, as set forth in the enclosed affidavit; therefore, NFS requests that this information be withheld from public disclosure. A non-proprietary version of these responses suitable for public disclosure is also enclosed herewith as Attachment 3.

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-04-0060) in any correspondence concerning this letter.

Sincerely,

NUCLEAR FUEL SERVICES, INC.



B. Marie Moore
Vice President
Safety and Regulatory

JSK/lsn
Enclosure/Attachments

cc:
Regional Administrator
U.S. Nuclear Regulatory Commission
Region II
Atlanta Federal Center
61 Forsyth Street, SW
Suite 23T85
Atlanta, GA 30303

Mr. William Gloersen
Project Inspector
U.S. Nuclear Regulatory Commission
Region II
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61 Forsyth Street, SW
Suite 23T85
Atlanta, GA 30303

Mr. Daniel Rich
Senior Resident Inspector
U.S. Nuclear Regulatory Commission

Attachment 1
Changes to Table 10.1 of SNM-124

Table 10.1

FIXED FIRE SUPPRESSION AND DETECTION SYSTEM LOCATION SUMMARY

Facility Suppression Matrix							
Facility No.	System Type					Area of Coverage	Comments/Remarks
	Wet	Dry	Deluge	PA	Other		
100	X					Complete Coverage	
104	X					Complete Coverage	
105	X					Complete Coverage, excluding the wet lab area	
	X				Manual	Fiberglass Hoods	
110		X				Complete Coverage in Areas A & B	
120	X					Complete Coverage	
130	X					Complete Coverage, excluding the mezzanine area	
220	X					Partial Coverage	
300 A/B		X				Complete Coverage	
301A	X					Building Heating Room and Calibration Furnace Only	
					Halon 1301	Security Secondary Alarm Room	Total flooding system
302				X	Carbon Dioxide	Solvent Extraction, Areas 300-500	Primarily a local application system, can be activated by installed heat detectors or by manual pull stations located adjacent to the coverage zones.
304	X					Partial Coverage	
305	X					Complete Coverage	
			X		Halon 1301	Security Process Area	Total flooding system
306	X					Partial Coverage	
320	X					Complete Coverage	
340	X					Complete Coverage	
345	X					Complete Coverage	
				X		Computer Room	
350	X					Complete Coverage	
310					ABC Dry Chemical	HAZMAT Locker	
T-12					ABC Dry Chemical	Complete Coverage	
510	X					Complete Coverage with exception of electrical room	
520	X					Complete, excluding 1 st /2 nd Floor of Conversion Area (Mod. Controlled Area) and Electrical Room	
530	X					Complete, excluding North/West Canopy and Electrical Room	

Facility Detection Matrix					
Facility	Smoke		Heat		Comments/Remarks
	Ion	Photo	Fixed	Rate Compensated	
105	X				Record Storage Vault Only
301	X				Security Room (SAS) Only
302	X	X	X	X	Photo smoke in Area 800, balance Ionization. Fixed Heat In Area D calciner, rate compensated heat in CO ₂ system coverage area.
303		X	X		Beam detection for general area, linear detection cable in selected areas.
305	X				Security Badging and Control Alarm Station Only
306	X				Vault, beam detection in 306 East
310			X		Complete Coverage
333	X	X	X		Complete Coverage
345	X				Duct Detection Also
510	X		X		Duct Detection Also
520	X	X	X		Duct Detection, Infrared Beam Detection
530	X	X	X		Electrical Room Only

Enclosure 1

**AFFIDAVIT
TRADE SECRETS OR COMMERCIAL INFORMATION**

I, B. Marie Moore, Vice President of Safety & Regulatory at Nuclear Fuel Services, Inc. (NFS), that to the best of my knowledge and beliefs (and in reliance on the affidavit of Framatome ANP, Inc. (FANP) ("Contractor") attached hereto, as applicable), make the following representation contained herein:

- A. The following document(s) which Nuclear Fuel Services, Inc. (NFS) wishes to have withheld from public disclosure is:
- Attachment 2 to NFS letter B. M. Moore to Director, NMSS,
dated April 30, 2004 (21G-04-0060), in its entirety.*
- B. The information contained in the document(s) cited in A above has been held in confidence by Nuclear Fuel Services, Inc. (NFS), or its Contractor, in that it contains trade secrets or commercial information as specified in Title 10, Code of Federal Regulations, Part 2.390(a). The basis for requesting that this document(s) be withheld from public disclosure is explicitly marked on the cover page to each of the aforementioned documents and/or the top of each affected page in accordance with 10 CFR 2.390(b)(i)(B).
- C. The information contained in the document(s) cited in A above is the intellectual property of Nuclear Fuel Services, Inc. (NFS), or its Contractor, and as such is customarily held in confidence by Nuclear Fuel Services, Inc. (NFS). As such, 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.

The information contained in the document(s) cited in A 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. In accordance with Nuclear Fuel Services, Inc. (NFS) policies governing the protection and control of information, proprietary information contained herein has been made available, on a limited basis, to others outside NFS only as required and under suitable agreement providing for nondisclosure and limited use of the information.

The public disclosure of the information contained in the document(s) cited in A above is likely to cause substantial economic harm to the competitive advantage held by Nuclear Fuel Services, Inc. (NFS), or its Contractor. The basis for withholding said information is that it contains distinguishing aspects of a process, methodology, or component(s), the exclusive use of which provides a competitive advantage for NFS or its Contractor in product optimization or marketability.

- D. The proprietary information that Nuclear Fuel Services, Inc. (NFS) requests to be withheld from public disclosure is contained in the entire document as so marked.


B. Marie Moore
Vice President
Safety & Regulatory

4/30/04
Date

I certify the above named person appeared before me and executed this document on this the 30th day of April, 2004.


Notary Public

My commission expires: 02/04/2007

Enclosure 2

**AFFIDAVIT
TRADE SECRETS OR COMMERCIAL INFORMATION**

I, John M. Flaherty, BLEU Complex Plant Manager at Framatome ANP, Inc. (FANP), that to the best of my knowledge and beliefs, make the following representation contained herein:

- A. The following document(s) which Framatome ANP, Inc. (FANP) wishes to have withheld from public disclosure is:

*Attachment 2 to NFS letter B. M. Moore to Director, NMSS,
dated April 30, 2004 (21G-04-0060), in its entirety.*

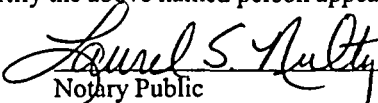
- B. The information contained in the document(s) cited in A above has been held in confidence by FANP, or its Contractor, in that it contains trade secrets or commercial information as specified in Title 10, Code of Federal Regulations, Part 2.390(a). The basis for requesting that this document(s) be withheld from public disclosure is explicitly marked on the cover page to each of the aforementioned documents and/or the top of each affected page in accordance with 10 CFR 2.390(b)(i)(B).
- C. The information contained in the document(s) cited in A above is the intellectual property of FANP, and as such is customarily held in confidence by FANP. As such, FANP 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.
- D. The information contained in the document(s) cited in A above has not been made available to public sources by FANP, nor has FANP authorized that it be made available. In accordance with FANP policies governing the protection and control of information, proprietary information contained herein has been made available, on a limited basis, to others outside FANP only as required and under suitable agreement providing for nondisclosure and limited use of the information.
- E. The public disclosure of the information contained in the document(s) cited in A above is likely to cause substantial economic harm to the competitive advantage held by FANP, or its Contractor. The basis for withholding said information is that it contains distinguishing aspects of a process, methodology, or component(s), the exclusive use of which provides a competitive advantage for FANP or its Contractor in product optimization or marketability.
- F. The proprietary information that FANP requests to be withheld from public disclosure is contained in the entire document(s) as so marked.



John M. Flaherty
BLEU Complex Plant Manager
Framatome ANP, Inc.

4/30/04
Date

I certify the above named person appeared before me and executed this document on this the 30th day of April, 2004.



Notary Public

My commission expires: 02/04/2007

