

November 9, 2004

NEF#04-048

ATTN: Document Control Desk
Director
Office of Nuclear Material Safety and Safeguards
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Louisiana Energy Services, L. P.
National Enrichment Facility
NRC Docket No. 70-3103

Subject: Clarifying Information Related to Charcoal Filter Efficiency Testing

- References:
1. Letter NEF#03-003 dated December 12, 2003, from E. J. Ferland (Louisiana Energy Services, L. P.) to Directors, Office of Nuclear Material Safety and Safeguards and the Division of Facilities and Security (NRC) regarding "Applications for a Material License Under 10 CFR 70, Domestic licensing of special nuclear material, 10 CFR 40, Domestic licensing of source material, and 10 CFR 30, Rules of general applicability to domestic licensing of byproduct material, and for a Facility Clearance Under 10 CFR 95, Facility security clearance and safeguarding of national security information and restricted data"
 2. Letter NEF#04-002 dated February 27, 2004, from R. M. Krich (Louisiana Energy Services, L. P.) to Director, Office of Nuclear Material Safety and Safeguards (NRC) regarding "Revision 1 to Applications for a Material License Under 10 CFR 70, "Domestic licensing of special nuclear material," 10 CFR 40, "Domestic licensing of source material," and 10 CFR 30, "Rules of general applicability to domestic licensing of byproduct material"
 3. Letter NEF#04-029 dated July 30, 2004, from R. M. Krich (Louisiana Energy Services, L. P.) to Director, Office of Nuclear Material Safety and Safeguards (NRC) regarding "Revision to Applications for a Material License Under 10 CFR 70, "Domestic licensing of special nuclear material," 10 CFR 40, "Domestic licensing of source material," and 10 CFR 30, "Rules of general applicability to domestic licensing of byproduct material"

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4. Letter NEF#04-037 dated September 30, 2004, from R. M. Krich (Louisiana Energy Services, L. P.) to Director, Office of Nuclear Material Safety and Safeguards (NRC) regarding "Revision to Applications for a Material License Under 10 CFR 70, "Domestic licensing of special nuclear material," 10 CFR 40, "Domestic licensing of source material," and 10 CFR 30, "Rules of general applicability to domestic licensing of byproduct material"
5. Letter NEF#04-018 dated May 19, 2004, from R. M. Krich (Louisiana Energy Services, L. P.) to Director, Office of Nuclear Material Safety and Safeguards (NRC) regarding "Response to Request for Additional Information Regarding National Enrichment Facility Safety Analysis Report and Emergency Plan"

By letter dated December 12, 2003 (Reference 1), E. J. Ferland of Louisiana Energy Services (LES), L. P., submitted to the NRC applications for the licenses necessary to authorize construction and operation of a gas centrifuge uranium enrichment facility. Revision 1 to these applications was submitted to the NRC by letter dated February 27, 2004 (Reference 2). Subsequent revisions (i.e., revision 2 and revision 3) to these applications were submitted to the NRC by letters dated July 30, 2004 (Reference 3) and September 30, 2004 (Reference 4), respectively.

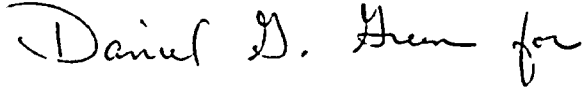
The Reference 5 letter includes the LES response to NRC Request for Additional Information (RAI) ISA-32, which provides information related to codes and standards for the Gaseous Effluent Vent Systems (GEVS) design and in-place testing. In a November 4, 2004, conference call between LES and NRC representatives concerning clarification of the response to NRC RAI ISA-32, information related to the efficiency of the impregnated charcoal filters for hydrogen fluoride (HF) removal and the associated standard for qualification testing was discussed. This letter provides that information, and the appropriate changes to the License Application and the Integrated Safety Analysis (ISA) Summary will be made in a future revision.

During the review of information to support the clarification, it was determined that the impregnated charcoal filter HF removal efficiency specified in the License Application and ISA Summary (i.e., 99.9%) for the Separations Building GEVS, the Technical Services Building GEVS and the Centrifuge Test and Post Mortem Facilities Exhaust Filtration System was not consistent with the Urenco specification for these impregnated charcoal filters. The Urenco specification for HF removal efficiency of these filters is 99%. As a result, the specified efficiency for HF removal of the impregnated charcoal of the Separations Building GEVS, the Technical Services Building GEVS and the Centrifuge Test and Post Mortem Facilities Exhaust Filtration System will be changed from 99.9% to 99% in the License Application and ISA Summary. The 99% HF removal efficiency value continues to support the estimated HF annual release quantity (i.e., 1.0 kg (2.2 lbs) of HF per year) currently reflected in the National Enrichment Facility License Application. In addition, it was determined that, for qualification testing to verify the HF removal efficiency of the impregnated charcoal filters, American Society for Testing and Materials (ASTM) D6646-03, "Standard Test Method for Determination of the Accelerated Hydrogen Sulfide Breakthrough Capacity of Granular and Pelletized Activated Carbon," modified to reflect removal of HF instead of hydrogen sulfide, would be used.

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If you have any questions or need additional information, please contact me at 630-657-2813.

Respectfully,

A handwritten signature in cursive script that reads "Daniel D. Green for".

R. M. Krich
Vice President – Licensing, Safety, and Nuclear Engineering

cc: T.C. Johnson, NRC Project Manager