



10 CFR 30.6
10 CFR 40.5
10 CFR 70.5

March 13, 2005

NEF#06-008

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: Fuel Cycle Facility Performance Indicator Request

- References:
1. Letter dated February 3, 2006, from Melanie A. Galloway (NRC) to Rod Krich (Louisiana Energy Services, L. P.) regarding "Fuel Cycle Performance Indicator Program"
 2. Letter NEF#06-005 dated February 27, 2006, from R. M. Krich (Louisiana Energy Services, L. P.) to Director, Office of Nuclear Material Safety and Safeguards (NRC) regarding "Responses to NRC Request for Clarifications on Depleted Uranium Disposition Costs and Fuel Cycle Facility Performance Indicator Program and Application for Withholding Information from Public Disclosure"

By letter dated February 3, 2006 (Reference 1), the NRC requested input by February 27, 2006, regarding performance indicators (PIs) for fuel cycle facilities. The Reference 2 letter indicated that the LES response would be provided by March 13, 2006. This letter provides the requested input regarding PIs for fuel cycle facilities.

The Reference 1 letter requested input for the following two questions.

1. What unique aspects of your facility do you believe should be taken into consideration as we propose facility-specific PIs?
2. What suggestions do you have for potential PIs and/or PI thresholds that might apply specifically to your facility?

LES Response to Question 1

The Reference 1 letter indicates that the PI program will be consistent with the philosophy of risk-informed, performance-based regulation and will complement 10 CFR 70 fuel cycle regulation and inspection. Accordingly, the unique aspects of the National Enrichment Facility (NEF) that should be considered in the development of NEF-specific PIs are derived from the NEF Integrated Safety Analysis (ISA) Summary.

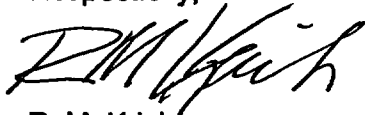
LES Response to Question 2

Potential NEF-specific PIs would include ISA Summary Initiating Events (e.g., Liquid Sampling Autoclave Heater Temperature Controller Failure), ISA Summary Prevention/Mitigating Systems (i.e., Hardware Items Relied On For Safety (IROFS) Unavailability, IROFS and Safe-By-Design Components Functional Failures), and IROFS Barrier Integrity (e.g., Liquid Sampling Autoclaves Leakage and Seismic Buildings Leakage). The thresholds for these potential NEF-specific PIs cannot be established at this time since the IROFS and the facility design are not yet finalized. However, it is expected that the process described in LES program EG-20, "NEF ISA Likelihood Evaluation Program Description," would be used by LES to provide input to establish these thresholds. LES program EG-20 sets forth the scope of the NEF ISA Initiating Events, the NEF ISA related functions of the IROFS, and the NEF safe-by-design components for which performance will be captured and monitored on a continuing basis to ensure facility operation is maintained consistent with the assumptions of the NEF ISA. This program also describes the method to be used to determine the performance attributes (e.g., reliability, availability) that are needed for monitoring of the required NEF systems and components.

Finally, the success of the revised Reactor Oversight Process and the associated PI program was due, in part, to the extensive interface between stakeholders and the NRC. Therefore, to ensure the success of the fuel cycle facility PI program, we encourage the establishment of a similar interface between the fuel cycle facility stakeholders and the NRC.

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

Respectfully,



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

cc: M. A Galloway, NRC Chief Technical Support Group
T.C. Johnson, NRC Project Manager