

June 6, 2012

Mr. Zackary W. Rad
Licensing Manager
Louisiana Energy Services, LLC
P.O. Box 1789
Eunice, NM 88231

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION FOR REVIEW OF THE 2011
TITLE 10 OF THE *CODE OF FEDERAL REGULATIONS* 70.72 SUMMARY OF
CHANGES FOR LOUISIANA ENERGY SERVICES

Dear Mr. Rad:

The staff has completed its review of your Annual Summary of the Title 10 of the *Code of Federal Regulations* (10 CFR) 70.72 (c) Evaluations dated January 30, 2012 (Agencywide Document Access and Management System [ADAMS] accession number ML12033A035). The correspondence provided a brief summary of changes to the records made without prior U.S. Nuclear Regulatory Commission (NRC) approval in accordance with 10 CFR, Section 70.72 (c). As a result of our review, we request that Louisiana Energy Services provide additional information supporting certain facility changes identified in the attachment to this letter (Facility Change Packages). Please provide this information for our review within 30 days from receipt of this letter. Also, notify us within this time period if you believe additional time will be needed to respond to any portion of the information requested in the attachment, together with a proposed schedule for its submittal.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter and the enclosure will be available electronically for public inspection in the NRC Public Document Room or from the NRC document system ADAMS. ADAMS is accessible from the NRC Website at <http://www.nrc.gov/reading-rm/adams.html>.

If you have any questions regarding this request, please contact Mike Raddatz, of my staff, at 301-492-3108, or via email to Michael.Raddatz@nrc.gov.

Sincerely,

/RA/

Brian W. Smith, Chief
Uranium Enrichment Branch
Division of Fuel Cycle Safety
and Safeguards
Office of Nuclear Material Safety
and Safeguards

Enclosure:
Request for Additional Information

Docket No. 70-3103
License No. SNM-2010

cc:

William Szymanski/DOE
Sam D. Cobb/Hobbs
Cindy Padilla/NMED
Glen Hackler/Andrews
Gary Schubert/Lea County
Michael Marriotte/NIRS
Jon Goldstein/NMED
Tannis Fox/NMED
Lindsay Lovejoy/NIRS

Alton Dunn/Jal
Daniel Stenger/H&H
Betty Rickman/Tatum
Matt White/Eunice
Richard Ratliff/Texas
CO'Claire/Ohio
Joseph Malherek/PC
Gary King/NMAG
Butch Tongate, NMED

Gregory Smith/LES
David Trujillo/Lovington
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| DATE | 04/16/12 | 04/18/12 | 06/06/12 |

OFFICIAL RECORD

Request for Additional Information

Facility Change Packages Requested for Louisiana Energy Services National Enrichment Facility

| 70.72 Identifier | Description |
|------------------|---|
| 2011-0042 | The proposed activity is for Configuration Change (CC) Number CC-EG-2011-0005. This activity involves the acceptance of a Quality Level (QL) 1 calculation that evaluates the roof transition details between SBM 1001X and the Cylinder Receipt And Dispatch Building (CRDB). The roof transition is part of the 2-hour fire barrier between these two buildings. This fire barrier is part of items relied on for safety (IROFS) 35; therefore, the transition design must meet QL 1 design requirements for tornado wind and seismic loading. CALC-2-00162 evaluates this roof transition to these requirements. The calculation demonstrates that the roof transition is structurally adequate and will perform its safety function. |
| 2011-0048, Rev 1 | The proposed activity is Revision 2 to Procedure OP-3-1000-19, IROFS 50f Construction Crane Permit and Barrier Control. This procedure provides instruction for controlling the proximity of construction cranes relative to the IROS50f area of concern when uranium hexafluoride (UF ₆) cylinders are present to prevent impact. This revision is to incorporate multiple editorial and procedure step enhancements that are minor in nature. Also, removed description of area of concern to reference procedure that controls the area of concern, OP-3-1000-24. |
| 2011-0064 | The proposed activity is Revision 7 to Procedure EG-3-3100-03, Quality Assurance (QA) Level Assignments. This procedure provides direction on assigning QA Levels to structures, systems and components and activities. This revision changed ownership of the procedure to Design Engineering Manager. This revision also added definitions for QLs 1, 2 and 3; added a line in Attachment 1 to address IROFS35 items; and changed Form 1 to allow the user to write in the QL. The specifics of the revisions are contained in the revision summary of the procedure. |
| 2011-0112 | The proposed activity is Revision 2 to Procedures OP-3-1000-15, IROFS50a UBC Storage Pad Barrier Control and OP-3-1000-22, IROFS50h UBC Storage Pad Barrier Control. This revision updates the referenced area of concern following the issuance of OP-3-1000-24, IROFS50 Series Areas of Concern. In addition, these procedures were updated to reflect modifications to similar IROFS50 breach permits that allow Operators to sign one of the required signatures on a Control Boundary Breach permit and more adequately defines the requirements for de-posting the flag person. The specifics of the revisions are contained in the revision summary of the procedures. |
| 2011-0143 | The proposed activity is for Configuration Change Number CC-EG-2011-007. This activity is the owner acceptance review (OAR) for a Simpson, Gumpertz & Heger calculation (CA-02), Response Spectra Generation for SBM-1003 Building [Ref. 21]. The purpose of this document is to analyze the response of SBM-1003 to a design basis earthquake (DBE), and demonstrate that the building design will maintain structural integrity during this event. This proposed change requires update to the ISA Summary Section 3.2.6 to describe the seismic analysis of SBM-1003. Additionally, SAR Section 1.3.5.2 is being revised to clarify the difference between the 10,000 year earthquake (0.15g) and the DBE (0.1611g). This difference is already described in ISA Summary Section 3.2.6 |
| 2011-0150 | The proposed activity is Minor Modification WO #3003581. This activity is an upgrade of a temporary modification to a permanent plant modification. Temporary Modification 10-773-001 was initiated to keep the trace heating circuits for all Low Temperature Take-off Station (LTTS) feed purification, product and tails stations in the active state. This was to ensure the cylinder surface and valve remains at an adequate temperature for normal operation. Per the temporary modification, the |

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| | functionality of the Safety Control Points (SCP) was overridden to ensure adequate temperature was maintained. Prior 70.72 Evaluation 2010-0438. |
| 2011-0218 | The proposed activity is Revision 7 to Procedure PR-3-2000-01, URENCO USA (UUSA) Control of Procurement. This procedure specifies process and responsibilities for controlling the procurement of items, materials, parts, and components, and services required for UUSA. This revision is primarily to implement a number of UUSA programmatic and procedural changes involving: (1) how IROFS Support Components (Safety Analysis Report [SAR] Table 3.4-1) are to be procured (QL-3) and then controlled as QL-2AC after receipt inspection; (2) how basic components of QL-1 F fire rated features like bolts, screws and sheet metal, can be procured as QL-3 items if the supplier does not have a Underwriters Laboratories or Factory Mutual certification; (3) reduction in the scope of QA review of procurement documents to only those involving QL classifications QL-1, QL-1F and QL-1G; and (4) removal of the current mixing of QL classifications and equipment groupings in the same sentence to that of QLs and "Applications." Other intent changes made that corrects procedural structure weaknesses or enhances the procedure. The specifics of the revision are contained in the revision summary of the procedure. |
| 2011-0239 | The proposed activity is for Revision 2 to CC Number CC-QA-2011-0001. This activity involves changes to SAR, Appendix A to the SAR involving the Quality Assurance Program Description (QAPD), and the Integrated Safety Analysis Summary (ISAS) are being revised to include Licensing Basis clarification information provided by License Amendment Request (LAR)-10-08 correspondence LES-10-00127-NRC, LES-10-0212-NRC, LES-10-00257-NRC, and LES-10-00261-NRC as approved by reference by the U.S. Nuclear Regulatory Commission (NRC) in its Safety Evaluation Report (SER) issued December 23, under IN-10-00166-NRC. The reason for the change occurred while trying to implement procurement of certain QL-1 F items where it became clear that certain information contained in the NRC SER for LAR 10-08 for implementation of Fire Protection IROFS had NOT been incorporated into the QAPD. |
| 2011-0295 | The proposed activity is CC Number CC-EG-2011-0010. This activity removes Accident Sequence PB1-3 from the ISAS and SAR and changes the applicability of IROFS45 to only apply to the CRDB and not to the Blending and Liquid Sampling Area (BLSA) or the UF ₆ Handling Area. (Note the BLSA was previously located in the CRDB, but is now contained in the UF ₆ Handling Area). Previously IROFS45 included language that it applied to the BLSA and the CRDB. However, when the CRDB was redesigned the BLSA was relocated to within the UF ₆ Handling Area in SBM-1001, and the accident described in Accident Sequence PB1-3 is not credible in the UF ₆ Handling Area. |
| 2011-0296 | The proposed activity is CC Number CC-OP-2011-0007. This activity removes Accident Sequence PB1-3 from the ISAS and SAR and changes the applicability of IROFS45 to only apply to the CRDB and not to the BLSA or the UF ₆ Handling Area. In addition, this activity revises the definition and implementation of IROFS45 and revises Accident Sequence RDI-1. The intent of IROFS45 is to ensure that no more than one filled or heeled 30B product cylinder is stacked or suspended above an array of other filled or heeled 308 cylinders, thus preventing the possibility of a nuclear criticality. |
| 2011-0297 | The proposed activity is the issuance of new Procedure MA-3-3400-11, IROFS11 Autoclave Heater and Fan High Temperature Trip - RTD Surveillance. This procedure provides instructions for functionally testing and calibrating the Autoclave Heater/Fan Trip generated by the PT100 Resistance Temperature Detector (RTD)(IROFS11). This procedure satisfies the surveillance requirements of ISA Summary IROFS11 and the Operating Requirements Manual (ORM) 3470-2. |
| 2011-0300 | The proposed activity is Design Change Notice DCN-2011-004. This activity is to install IROFSC21 in the Pressure Transducer Calibration Rig (0000-499-1U1). |

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| | There is a postulated scenario where if the valve lineup is incorrect (operator error), the rig could vent to atmosphere. The IROFSC21 orifice spool is installed in locations upstream of the two pumping trains to reduce flow and minimize consequence to the local worker. |
| 2011-0440 | The proposed activity is CC Number CC-EG-2008-0126. This activity is for the removal of Accident Sequence PB3-3 and associated IROFS3 and 47a. An ISA Team Meeting held on August 3, 2010, determined that accident sequence falls into the category of not credible based on NUREG 1520, Rev. 1 criteria: a process deviation that consists of a sequence of many human actions or errors for which there is no reason or motive. |
| 2011-0588 | The proposed activity is CC Number CC-EG-2011-0124. This activity involves the SAR and ISA Summary which are being changed to incorporate various corrective actions from Condition Reports (CR) CR-2011-0301 (Facility Fire Accident Sequences Need Updating), CR-2011-1591 (SAR Statement needs to be broader to include current operations), CR-2011-2127 (Tracking CR for documentation impact from creating NCS-CSA-016), CR-2011-3142 (Accident Sequences applicable to IROFSC21). The SAR changes include updating the Table 6.1-2 to the new values identified in the ISA Calculation 32-2400503-01-LES Attachment F (ISA Consequences Assessments of Airborne Releases Attachment F: Fire Accident Scenarios) and broaden the SAR statement pertaining to Separations Building Module (SBM) operations due to allowance to store product cylinders in the UF6 Handling Area. The ISA Summary changes were to: 1) Update the facility fire accident sequences to be consistent with the applicable ISA, which was updated due to the addition of SBM-1003 as each SBM has a different material at risk inventory (the description of the UF6 inventory was described in more generic terms); 2) Correct the public consequences statement in Accident Sequence EC4-1 as the public consequences are low; and 3) Update the 30B product cylinder criticality analysis on the nuclear criticality safety analysis (NCS-CSA-016). |