

JUL 18 2012

LES-12-00103-NRC

urencO

Attn: Document Control Desk  
Office of Nuclear Material Safety and Safeguards  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555-0001

Louisiana Energy Services, LLC  
NRC Docket No. 70-3103

Subject: Revised Affidavit

Reference: 1. Telecommunication from J. Rollins (UUSA) to M. Raddatz (NRC),  
Affidavit Marked Confidential, on July 17, 2012  
2. LES-12-00097-NRC, Revised Affidavit, dated July 9, 2012

Pursuant to the Ref. 1 telecommunication, Louisiana Energy Services, LLC (dba "UUSA") hereby provides this submittal (cover letter and enclosed affidavit) as a replacement for the entire Ref. 2 submittal.

Should there be any questions concerning this replacement submittal, please contact the undersigned at 575-394-6598.

Respectfully,



Perry D. Robinson  
VP Regulatory Affairs & General Counsel

Enclosure: Revised Affidavit

cc:

Mike G. Raddatz, Project Manager  
U.S. Nuclear Regulatory Commission  
Executive Blvd Bldg  
Mailstop: EBB2-C40M  
Washington, DC 20555-0001

Brian W. Smith  
Chief, Uranium Enrichment Branch  
U.S. Nuclear Regulatory Commission  
Executive Blvd Bldg  
Mailstop: EBB2-C40M  
Washington, DC 20555-0001

1115501

## ENCLOSURE

### Revised Affidavit

I, Perry D. Robinson, being duly sworn, state that I am the Vice President Regulatory Affairs & General Counsel for Louisiana Energy Services, LLC (dba "UUSA") at the URENCO USA Facility; that I am authorized on the part of said company to sign and file with the Nuclear Regulatory Commission ("NRC") this document; and that all statements made and matters set forth herein are true and correct to the best of my knowledge, information, and belief:

1. UUSA wishes to have withheld from public disclosure the following documents:

LES Letter No. LES-12-00062-NRC, Enclosure 1 and Enclosure 2  
(Enclosure 1 Attachments A and C through K only)

2. The information contained in the documents cited in 1 above for which exemption from public disclosure is requested is company business confidential and personal privacy information as described in Table 1 – Basis for Exemption from Disclosure. UUSA requests that this information be exempt from disclosure pursuant to the provisions in 10 CFR Part 2.390(a)(4).

Table 1 - Basis for Exemption from Disclosure

Document	Basis for Exemption
Enclosure 1	This Document contains a summary of all the UUSA responses. These responses essentially provide a clear road-map for resolution of these issues, which represents substantial investment by UUSA to develop these responses, which should not be released to competitors.
Enclosure 1 - Attachment A	This document contains detailed construction sequencing information which could allow a competitor to follow this methodology for construction of a similar facility.
Enclosure 1 - Attachment C	This 20 page document should be with-held because it contains proprietary Engineering Analysis which was developed for UUSA to justify the use of the selected methods.
Enclosure 1 - Attachment D	This 14 page document contains proprietary procedural guidance for Concrete and Grout Placement, which should not be released to competitors.
Enclosure 1 - Attachment E	This 1 page document provides test data which was obtained through the use of proprietary engineering analysis methods to justify the Exception Request, which should not be released to competitors.

Document	Basis for Exemption
Enclosure 1 - Attachment F	This 3 page document describes in detail the documentation which was available, and the basis for acceptance of this documentation for the exception request. This information should not be released to competitors.
Enclosure 1 - Attachment G	This 2 page document provides clarification for the basis for approval of the Exception Request, using proprietary analysis and justification which should not be released to competitors.
Enclosure 1 - Attachment H	This 1 page document provides clarification for the basis for approval of the Exception Request, using proprietary analysis and justification which should not be released to competitors.
Enclosure 1 - Attachment I	This 1 page document provides clarification for the basis for approval of the Exception Request, using proprietary analysis and justification which should not be released to competitors.
Enclosure 1 - Attachment J	This 1 page document provides personnel training records and personal identification information, which are to be maintained confidential for the purposes of the Exception Request.
Enclosure 1 - Attachment K	This 17 page document provides proprietary procedural guidance for Administrative Controls, which should not be released to competitors.

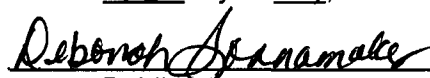
3. Public disclosure of the information cited in 1 above has the potential to result in substantial harm to the competitive position of UUSA, provide valuable business information to competitors of UUSA which they could duplicate without having to expend their own resources to develop, and reduce or foreclose the availability of profit opportunities.
4. The information sought to be withheld is not available in public sources, to the best of UUSA's knowledge and belief.
5. The information stated in this affidavit has been submitted in accordance with the applicable parts of 10 CFR 2.390 and the guidance contained in NUREG-1556, Vol. 20, Appendix C.4.

  
Perry D. Robinson

7-18-12  
Date

Vice President Regulatory Affairs & General Counsel  
URENCO USA

I certify the above named person appeared before me and executed this document on this 18 day of July, 2012.

  
Notary Public

My commission expires: 2-28-15

