

March 18, 2014

Mr. George Harper, Vice President  
Engineering and Licensing  
AREVA Enrichment Services, LLC  
400 Donald Lynch Boulevard  
Marlborough, MA 01752

SUBJECT: APPROVAL OF LICENSE AMENDMENT REQUEST 13-03, REQUEST TO  
MODIFY MATERIALS LICENSE SNM-2015, LICENSE CONDITION NO. 13

Dear Mr. Harper:

On November 19, 2013, AREVA Enrichment Services, LLC (AES) submitted License Amendment Request 13-03, request to the U.S. Nuclear Regulatory Commission (NRC) to modify Materials License Special Nuclear Materials (SNM) SNM-2015, to modify license condition No. 13 to address the process for making changes to the license application documents using guidance provided in Regulatory Guide (RG) 3.74, "Guidance for Fuel Cycle Facility Change Processes" published in January 2012.

The proposed modification to Materials License SNM-2015, Condition No. 13, follows the guidance provided by the staff in RG 3.74. The staff agrees with the determination that the proposed changes to License Condition No. 13 are administrative only and provide clarity for evaluation and implementation of changes to the safety analysis report (SAR). The term "license application" will be replaced with the term "SAR" since the SAR is the only license application document used by AES outside the provisions of Title 10 of the *Code of Federal Regulations* (10 CFR) 70.72, that is not subject to a change control regulation or defined process. The term SAR is also consistent with the terminology used by the licensee to describe and maintain the safety evaluation in the license application. Given that this proposed change is administrative and uses terms consistent with AES processes and documentation, the staff finds that it is acceptable.

The timeframe, every six months, for submitting a summary of changes made to the SAR without NRC prior approval is consistent with what has been previously approved by the NRC and is conservative relative to the one year period provided in the guidance. The staff therefore finds this modification to also be acceptable.

AES considers that the proposed modification to Materials License SNM-2015, Condition No. 13 is acceptable for the following reasons:

1. The change is administrative in nature.
2. The proposed language is consistent with previously approved NRC guidance.
3. No 10 CFR 70.61 performance requirement is impacted.

The staff concurs with these supporting reasons and therefore finds the proposed amendment to the AES license to be acceptable.

The changes requested are considered administrative in nature (i) there is no significant change in the types or significant increase in the amounts of any effluents that may be released offsite, (ii) there is no significant increase in individual or cumulative occupational radiation exposure, (iii) there is no significant construction impact, and (iv) there is no significant increase in the potential for or consequences from radiological accidents. Therefore, the staff has determined that the changes are categorically excluded from the requirement to prepare a site-specific environmental assessment. Therefore, in accordance with 10 CFR 51.22(c)(11), neither an environmental assessment nor an environmental impact statement is warranted for this action. Upon review of the revisions the staff found that the changes are consistent with the regulatory requirements in 10 CFR Parts 20 and 70. Accordingly, approval of the amendment request is granted.

If you have any questions concerning this letter, please contact James Smith at 301-287-9138, or via e-mail to [James.Smith@nrc.gov](mailto:James.Smith@nrc.gov).

Sincerely,

**/RA/ T. Grice for**

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

Docket No. 70-7015

cc: Mr. Jim Kay

Enclosures:

1. Safety Evaluation Report
2. License Amendment

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