

21G-16-0180
GOV-01-55-06
ACF-16-0284

October 27, 2016

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

- References:
- 1) Docket No. 70-143; SNM License 124
 - 2) Letter (21G-06-0049) from B. Marie Moore to NRC, submittal of North Site Decommissioning Plan, Revision 03, dated May 2, 2006
 - 3) Letter from NRC to B. Marie Moore, Nuclear Fuel Services, Inc. Acknowledgement and Acceptance of Revision 3 to North Site Decommissioning Plan (TAC L31949), dated May 18, 2006
 - 4) Letter (21G-16-0076) from Richard Freudenberger to NRC, submittal of Final Status Survey Final Report for Survey Units 4, 6, 7, 12, 16, 17, & 18, dated July 28, 2016 [diskette]
 - 5) Email from Kevin Ramsey (NRC) to NFS, Rejection of Final Status Survey Final Report for Survey Units 4, 6, 7, 12, 16, 17, & 18, dated August 10, 2016

Subject: Resubmittal of Final Status Survey Final Report for Survey Units 4, 6, 7, 12, 16, 17, & 18 (printed copy)

Nuclear Fuel Services, Inc. (NFS) hereby submits the Final Status Survey (FSS) Final Report for seven survey units located at the North Site (Enclosure 1) in a printed hard copy, as requested in an email from Kevin Ramsey (Reference 5). Specifically, this FSS Report is for Survey Units 4, 6, 7, 12, 16, 17, & 18. As previously submitted and noted in Reference 4, this FSS was conducted in accordance with methods specified in References 2 and 3. The radiological survey data demonstrates that the site meets the established Derived Concentration Guideline Levels (DCGLs). While NFS does not intend to request a partial site release of this area at this time, we request confirmation that these survey units will be suitable for unrestricted release in accordance with Title 10, Code of Federal Regulations (CFR), Part 20, Subpart E.

The enclosed report (Enclosure 1) contains contractor proprietary information, as set forth in the attached affidavit copies from the original submittal on July 28, 2016, (Attachments 1 and 2), in accordance with 10 CFR 2.390(a) (4), and is not suitable for public release. A redacted version that is suitable for public release has been included in Enclosure 2.

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If you or your staff have any questions, require additional information, or wish to discuss this further, please contact me, or Mr. Scott Morie, Decommissioning Environmental Unit Manager at (423) 735-5616. Please reference our unique document identification number (21G-16-0180) in any correspondence concerning this letter.

Sincerely,

NUCLEAR FUEL SERVICES, INC.



Richard J. Freudenberger, Director
Safety and Safeguards

CSM/pdj

- Attachment 1: **NFS Affidavit Trade Secrets or Commercial Information (copy of original previously submitted July 28, 2016)**
- Attachment 2: **AMEC Affidavit Trade Secrets or Proprietary Commercial Information (copy of original previously submitted July 28, 2016)**
- Enclosure 1: **Final Status Survey Report for Survey Units 4, 6, 7, 12, 16, 17, & 18 (Not Suitable for Public Release)**
- Enclosure 2: **Final Status Survey Report - Redacted Version - for Survey Units 4, 6, 7, 12, 16, 17, & 18 (Suitable for Public Release)**

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Copy with attachments/enclosures:

Mr. Kevin Ramsey
Senior Project Manager
Fuel Manufacturing Branch
Division of Fuel Cycle Safety, Safeguards,
and Environmental Review
Office of Nuclear Material Safety and Safeguards
U.S. Nuclear Regulatory Commission
Two White Flint North
11555 Rockville Pike
Rockville, MD 20852-2738

Copy without attachments/enclosures:

Regional Administrator
U.S. Nuclear Regulatory Commission
Region II
245 Peachtree Center Avenue NE,
Suite 1200
Atlanta, GA 30303-1257

Mr. Leonard Pitts
Senior Fuel Facility Inspector
U.S. Nuclear Regulatory Commission
Region II
245 Peachtree Center Ave., NE, Suite 1200
Atlanta, GA 30303

Mr. Charles Stancil
Senior Resident Inspector
U.S. Nuclear Regulatory Commission

Attachment 1

**NFS Affidavit
Trade Secrets or Commercial Information
COPY
(of original previously submitted July 28, 2016)**

(2 pages to follow)

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COPY

**AFFIDAVIT
TRADE SECRETS OR COMMERCIAL INFORMATION**

I, Richard J. Freudenberger, Director of Safety & Safeguards at Nuclear Fuel Services, Inc. (NFS), that to the best of my knowledge and beliefs, make the following representation contained herein:

- A. The following document(s) which Nuclear Fuel Services, Inc. (NFS) wishes to have withheld from public disclosure is:

Enclosure 1 to letter (21G-16-0076) dated July 28, 2016:
Final Status Survey Report for Survey Units 4, 6, 7, 12, 16, 17, & 18

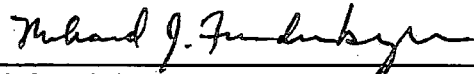
- B. The information contained in the document(s) cited in A above has been held in confidence by Nuclear Fuel Services, Inc. (NFS), in that it contains trade secrets or commercial information as specified in Title 10, Code of Federal Regulations, Part 2.390(a). The basis for requesting that this document(s) be withheld from public disclosure is explicitly marked on the cover page to each of the aforementioned documents and/or the top of each affected page, as appropriate, in accordance with 10 CFR 2.390(b)(i)(B).
- C. The information contained in the document(s) cited in A above is the intellectual property of Nuclear Fuel Services, Inc. (NFS), and as such is customarily held in confidence by Nuclear Fuel Services, Inc. (NFS). As such, Nuclear Fuel Services, Inc. (NFS) has customarily submitted privileged and confidential information of this type to the Nuclear Regulatory Commission (NRC) and to its predecessor, the Atomic Energy Commission (AEC), in confidence.
- D. The information contained in the document(s) cited in A above has not been made available to public sources by Nuclear Fuel Services, Inc. (NFS), nor has Nuclear Fuel Services, Inc. (NFS) authorized that it be made available. In accordance with Nuclear Fuel Services, Inc. (NFS) policies governing the protection and control of information, proprietary information contained herein has been made available, on a limited basis, to others outside Nuclear Fuel Services, Inc. (NFS) only as required and under suitable agreement providing for nondisclosure and limited use of the information.
- E. The public disclosure of the information contained in the document(s) cited in A above is likely to cause substantial economic harm to the competitive advantage held by Nuclear Fuel Services, Inc. (NFS). The basis for withholding said information is that it contains distinguishing aspects of a process, methodology, or component(s), the exclusive use of which provides a competitive advantage for Nuclear Fuel Services, Inc. (NFS) in product optimization or marketability.

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- F. The proprietary information that Nuclear Fuel Services, Inc. (NFS) requests to be withheld from public disclosure is contained in the entire document(s) as so marked.

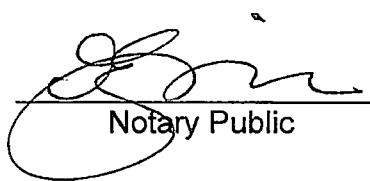


Richard J. Freudenberger
Director, Safety & Safeguards

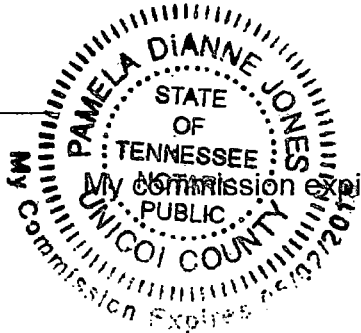
7/28/16

Date

I certify the above named person appeared before me and executed this document on this the 28 day of July, 2016.



Notary Public


My Commission Expires: 5-2-18

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Attachment 2

**AMEC Affidavit
Trade Secrets or Proprietary Commercial Information
COPY
(of original previously submitted July 28, 2016)**

(1 page to follow)

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**AFFIDAVIT
TRADE SECRETS OR PROPRIETARY COMMERCIAL INFORMATION**

AL
7/27/16
I, Alejandro Lopez, Senior Principal Health Physicist, at AMEC Environment & Infrastructure, Inc. (AMEC), that to the best of my knowledge and beliefs, make the following representation contained herein:

- A. The following document(s), portions of which AMEC Environment & Infrastructure, Inc. (AMEC) wishes to have withheld from public disclosure is/are:

Final Status Survey Report for Survey Units 4, 6, 7, 12, 16, 17, & 18 dated July 2016
(Enclosure 1 to NFS letter (21G-16-0076) to NRC, dated July 2016.)

- B. Parts of the information contained in the document(s) cited in A above has been held in confidence by AMEC Environment & Infrastructure, Inc. (AMEC), in that it contains trade secrets or proprietary commercial information as specified in Title 10, Code of Federal Regulations, Part 2.390(a). The basis for requesting that portions of this document(s) be withheld from public disclosure is explicitly marked on the cover page to each of the aforementioned documents and/or the top of each affected page in accordance with 10 CFR 2.390(b)(1)(B).
- C. The information contained in the document(s) cited in A above is the intellectual property of AMEC Environment & Infrastructure, Inc. (AMEC), and as such is customarily held in confidence by AMEC Environment & Infrastructure, Inc. (AMEC). As such, AMEC Environment & Infrastructure, Inc. (AMEC) has customarily submitted privileged and confidential information of this type to the Nuclear Regulatory Commission (NRC) in confidence.
- D. The information contained in the marked pages of the document(s) cited in A above has not been made available to public sources by AMEC Environment & Infrastructure, Inc. (AMEC), nor has AMEC Environment & Infrastructure, Inc. (AMEC) authorized that it be made available. In accordance with AMEC Environment & Infrastructure, Inc. (AMEC) policies governing the protection and control of information, proprietary information contained herein has been made available, on a limited basis, to others outside AMEC Environment & Infrastructure, Inc. (AMEC) only as required and under suitable agreement providing for nondisclosure and limited use of the information.
- E. The public disclosure of the information contained in the marked pages of the document(s) cited in A above is likely to cause substantial economic harm to the competitive advantage held by AMEC Environment & Infrastructure, Inc. (AMEC). The basis for withholding said information is that it contains distinguishing aspects of a process, methodology, or component(s), the exclusive use of which provides a competitive advantage for AMEC Environment & Infrastructure, Inc. (AMEC) in product optimization or marketability.
- F. The proprietary information that AMEC Environment & Infrastructure, Inc. (AMEC) requests to be withheld from public disclosure is contained on clearly marked pages within the entire document(s) as so marked.

AL
7/27/16
Alejandro Lopez
Senior Principal Health Physicist
Date 7/27/16

I certify the above named person appeared before me and executed this document on this the 27th day of July, 2016.

Deborah B. Moretti
Notary Public

My commission expires: 12/02/2018 COMMONWEALTH OF PENNSYLVANIA

NOTARIAL SEAL
Deborah B. Moretti, Notary Public
Carnegie Boro, Allegheny County
My Commission Expires Dec. 2, 2018
MEMBER, PENNSYLVANIA ASSOCIATION OF NOTARIES

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Enclosure 1

**Final Status Survey Report
for Survey Units 4, 6, 7, 12, 16, 17, & 18**

NOT SUITABLE FOR PUBLIC RELEASE

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Enclosure 2

**Final Status Survey Report
– Redacted Version –
for Survey Units 4, 6, 7, 12, 16, 17, & 18**

SUITABLE FOR PUBLIC RELEASE

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