



Nuclear Fuel Services, Inc.

~~CONFIDENTIAL RD~~

21Y-19-0001
NFE-19-0007
GOV-01-55-04
ACF-19-0003
January 24, 2019

Director, Office of Nuclear Material Safety and Safeguards
U.S. Nuclear Regulatory Commission
Caller Box 2500
Rockville, MD 20852
ATTN: Document Custodian

References: 1) Docket No. 70-143; SNM-124
2) Letter from R. J. Freudenberger to NRC, Revisions to Unclassified Integrated Safety Analysis Summaries for Calendar Year 2018 (21G-19-0005), dated January 24, 2019

Subject: Revisions to Classified Integrated Safety Analysis Summaries for Calendar Year 2018

In accordance with Title 10, Code of Federal Regulations, Part 70.72(d)(3), and SNM-124, Section 3.1.4, paragraph 3, Nuclear Fuel Services, Inc. (NFS), hereby submits revisions to the subject Integrated Safety Analysis (ISA) Summaries that reflect changes implemented in Calendar Year 2018. Changes are denoted by vertical lines in the right margin of affected pages and are summarized in the Record of Revision of the affected ISA Summary. Additional *unclassified* ISA Summaries are being submitted under separate cover letter (Reference 2).

A review of the changes incorporated in the Calendar Year 2018 submittal was performed, and none of the changes implemented in the summaries were associated with licensing actions processed since the NFS license (SNM-124) was renewed in 2012.

Derived from: DOE-DOD Classification Guide
CG-RN-1 Revision 3 dtd February 1996

RESTRICTED DATA

This document contains Restricted Data as defined in the Atomic Energy Act of 1954. Unauthorized disclosure subject to Administrative and Criminal Sanctions.

Derivative Classifier

R. Shaeferford

(name)

Nuclear Safety & Licensing mat.

(title)

/Nuclear Fuel Services, Inc.

1/21/19

(date)

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The documents and drawings enclosed herewith are being submitted to the NRC for docketing in the NFS Erwin License Docket (Reference 1). Said enclosures contain NFS proprietary information, as set forth in the enclosed affidavit in accordance with 10 CFR 2.390(a)(4).

The drawings enclosed herewith have the following statement affixed:

"This drawing and all information contained herein is the property of Nuclear Fuel Services, Inc. and shall not be used or disclosed for any purpose other than that for which it has been furnished without the express written consent of NFS."

Notwithstanding the language of this restriction, NFS acknowledges that reproduction and controlled distribution of submitted documents, in accordance with NRC regulations and requirements, is necessary in order for the NRC to carry out its legal and regulatory responsibilities. Further, NFS acknowledges that reproduction and controlled distribution of these drawings by a third party authorized by the NRC is allowable by this language. Therefore, it is NFS' position that the enclosed drawings may be reproduced and distributed in a controlled manner, by a third party authorized by the NRC, for NRC's purposes and use without violation of the statement above.

If you or your staff have any questions, require additional information, or wish to discuss this further, please contact me at (423) 743-1705, or Mr. Robert Maurer, ISA and Fire Protection Manager, at (423) 735-5583. Please reference our unique document identification number (21Y-19-0001) in any correspondence concerning this letter.

Sincerely,

NUCLEAR FUEL SERVICES, INC.



Richard J. Freudenberger, Director
Safety and Safeguards

/pdj

Enclosure: Affidavit

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Attachment: **Revisions to Classified Integrated Safety Analysis Summaries for Calendar Year 2018:**

300 Complex Production ISA Summary (U), Rev 15, (21X-19-0002/NFE-19-0002)

300 Complex Recovery ISA Summary(U), Rev 15, (21X-19-0003/NFE-19-0003)

300 Complex Support Systems ISA Summary (U), Rev 14, (21X-19-0004/NFE-19-0004)

Building 105 Laboratory ISA Summary (U), Rev 15, (21X-19-0005/NFE-19-0005)

Waste Water Treatment Facility ISA Summary (U), Rev 14, (21X-19-0006/NFE-19-0006)

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ENCLOSURE

AFFIDAVIT
TRADE SECRETS OR COMMERCIAL INFORMATION

(2 pages)

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AFFIDAVIT

TRADE SECRETS OR COMMERCIAL INFORMATION

I, Richard J. Freudenberger, representing the Safety and Safeguards Department 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 which Nuclear Fuel Services, Inc. (NFS) wishes to have withheld from public disclosure is the Attachment to NFS letter (21Y-19-0001), dated January 24, 2019:

Revisions to Classified Integrated Safety Analysis Summaries for Calendar Year 2018:

300 Complex Production ISA Summary (U), Rev 15, (21X-19-0002/NFE-19-0002)
300 Complex Recovery ISA Summary(U), Rev 15, (21X-19-0003/NFE-19-0003)
300 Complex Support Systems ISA Summary (U), Rev 14, (21X-19-0004/NFE-19-0004)
Building 105 Laboratory ISA Summary (U), Rev 15, (21X-19-0005/NFE-19-0005)
Waste Water Treatment Facility ISA Summary (U), Rev 14, (21X-19-0006/NFE-19-0006)

- B. The information contained in the document cited in A above has been held in confidence by Nuclear Fuel Services, Inc. (NFS), or its Contractor, 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 in accordance with 10 CFR 2.390(b)(i)(B).
- C. The information contained in the document cited in A above is the intellectual property of Nuclear Fuel Services, Inc. (NFS), or its Contractor, 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 cited in A above has not been made available to public sources by Nuclear Fuel Services, Inc. (NFS), nor has Nuclear

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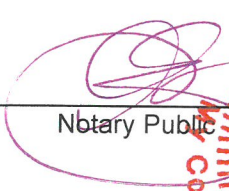
Fuel Services, Inc. (NFS) authorized that it be made available. In accordance with Nuclear Fuel Services, Inc. (NFS) policies governing the protection and control of information, proprietary information contained herein has been made available, on a limited basis, to others outside NFS only as required and under suitable agreement providing for nondisclosure and limited use of the information.

- E. The public disclosure of the information contained in the document cited in A above is likely to cause substantial economic harm to the competitive advantage held by Nuclear Fuel Services, Inc. (NFS), or its Contractor. 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 NFS or its Contractor in product optimization or marketability.
- F. The proprietary information that Nuclear Fuel Services, Inc. (NFS) requests to be withheld from public disclosure is contained in the entire document as so marked.


Richard J. Freudenberger
Safety and Safeguards Director

1/24/19
Date

I certify the above named person appeared before me and executed this document on this the 24 day of January, 2019.


Notary Public


My commission expires:

4-30-22

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ATTACHMENT

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