



Nuclear Fuel Services, Inc.

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21Y-19-0003
GOV-01-55-04
NFE-19-0063
ACF-19-0065

March 8, 2019

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

- Reference:
- 1) Docket No. 70-143; SNM License 124
 - 2) Letter from R. J. Freudenberger to NRC, NFS Physical Protection Plan, Revision 020 (21Y-18-0004), dated September 21, 2018
 - 3) Letter from NRC to R. J. Freudenberger, Request for Additional Information Concerning Revision 20 of the Physical Protection Plan (Enterprise Project Identifier L-2018-SPR-0005), dated November 29, 2018
 - 4) Letter from R. J. Freudenberger to NRC, Response to Request for Additional Information Concerning NFS Physical Protection Plan, Revision 020, (21Y-19-0002), dated January 31, 2019

Subject: **Resubmittal of NFS Physical Protection Plan, Revision 020**

Nuclear Fuel Services, Inc. (NFS), hereby resubmits NFS Physical Protection Plan, Revision 020 (24X-18-0010). This change is being transmitted as a 10 CFR 70.34 change pursuant to a plan commitment requiring NFS to request NRC approval before making NRC Order commitment changes. This change does not lessen the effectiveness of the security program. A technical basis for the resubmittal has been included for your review.

Documents transmitted contain National Security Information. When separated from enclosures, this transmittal document is Unclassified.

If you or your staff have any questions, require additional information, or wish to discuss this further, please contact me, or Mr. Tom Evans, Security Director at (423) 743-1704. Please reference our unique document identification number (21Y-19-0003) in any correspondence concerning this letter.

Derivative Classifier	<u>Marcus Derman</u>
(Name)	
	<u>Security compliance manager</u>
(Title)	
Nuclear Fuel Services, Inc. Date:	<u>3-8-19</u>
Derived From:	<u>CESSH, 9-12-00 DOECC</u>
(Classification Guidance, Date)	
Declassify On:	<u>25X8; upon facility closure</u>
(Declassification Instruction)	

Derivative Classifier review
required prior to declassification

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Sincerely,

NUCLEAR FUEL SERVICES, INC.



Richard J. Freudenberger, Director
Safety and Safeguards

AAM/smd

Enclosure 1: Technical Basis for Resubmittal (U)

Enclosure 2: NFS Physical Protection Plan, Revision 020

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Enclosure 1
Technical Basis for Resubmittal (U)

During review of the NFS Physical Protection Plan, Revision 020 (24X-18-0010), dated September 21, 2018, NFS identified three (3) references to NRC Regulatory Guide 5.70, Guidance for the Application of the Theft and Diversion Design-Basis Threat for Category I Fuel Cycle Facilities. NRC Regulatory Guide 5.70 was considered as part of the revision, however, the references were included before a detailed comparison of NRC Regulatory Guide 5.70 and the NRC Design Basis Threat (DBT) Order, dated April 29, 2003 could be performed. Therefore, the reference to NRC Regulatory Guide 5.70 was premature.

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Enclosure 2
NFS Physical Protection Plan, Revision 020 (U)
(100 Pages)

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