

NOV 12 2019

LES-19-142-NRC



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: License Amendment Request for Changes to License Condition 6B and Enrichment Limit (LAR-19-01)

References: 1) LES-13-00073-NRC, Submittal of License Amendment Request for Changes to License Condition 6B and Enrichment Limit (LAR-13-02), dated July 16, 2013.

Pursuant to the requirements of SNM-2010, Conditions 25 and 30 and 10 CFR 70.72 (c)(4), and in accordance with 10 CFR 70.34, Louisiana Energy Services, LLC (LES), dba URENCO USA (UUSA), hereby requests an amendment to Material License SNM-2010.

As stated in the referenced submittal, UUSA anticipated submitting a follow-on Amendment to LAR-13-02 to request the removal of the last sentence of Materials License Condition 6B upon the completion of supporting technical safety documentation. The supporting technical analysis has been completed and this request is to remove the operational constraint, which will allow UUSA to not only possess, but also produce enriched UF<sub>6</sub> at 5.5 wt. % <sup>235</sup>U.

Enclosure 1 provides an affidavit whereby UUSA considers the information provided in Enclosures 2 and 3 as Sensitive Unclassified Non-Safeguards Information (SUNSI), and requests that the information be withheld from public disclosure in accordance with 10 CFR 2.390 and the guidance described in RIS 2005-31, Appendix 1.

Enclosure 2 provides a description and analysis of the proposed change, basis for the change, and safety significance of the proposed change. Enclosure 3 provides the pages of the License Basis Documents proposed to be revised with the changes annotated on the pages.

UUSA appreciates the efforts of NRC staff in supporting this review. If you have any questions regarding this License Amendment Request, you may contact Wyatt Padgett, Licensing and Performance Assessment Manager, at 575-394-5257.

Stephen Cowne  
Chief Nuclear Officer and Compliance Manager

Enclosures: 1) Affidavit  
2) Description of Proposed Changes (LAR-19-01)  
3) Markup Pages to the Licensing Basis Document

NMSSO1

cc: via email

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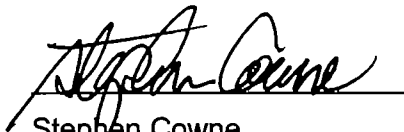
Kevin Ramsey  
Project Manager  
U.S. Nuclear Regulatory Commission  
[Kevin.Ramsey@nrc.gov](mailto:Kevin.Ramsey@nrc.gov)

## ENCLOSURE 1

### Affidavit

I, Stephen Cowne, being duly sworn, state that I am the Chief Nuclear Officer and Compliance Manager for Louisiana Energy Services (LES), dba URENCO USA (UUSA); 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:

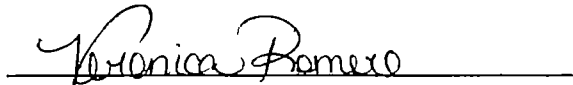
1. LES wishes to have withheld from public disclosure the following document:
  - LES-19-142-NRC Enclosure 2, UUSA Enrichment Level Limit License Amendment Request (LAR-19-01)
  - LES-19-142-NRC Enclosure 3, Markup Pages to the Licensing Basis Documents (Materials License only)
2. The information contained in the documents cited above for which exemption from public disclosure is requested is 1) proprietary information related to commercial aspects of the URENCO USA Facility and 2) security related information. LES requests that the proprietary and Sensitive Unclassified Non-Safeguards Information (SUNSI) be exempt from disclosure pursuant to the provisions in 10 CFR Part 2.390(a)(4).
3. Public disclosure of the information in the above enclosure to this submittal has the potential to result in substantial harm to the competitive position of LES, provide valuable business information to competitors of LES 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 stated in this affidavit has been submitted in accordance with the applicable parts of 10 CFR 2.390, the guidance contained in NUREG-1556, Vol. 20, Appendix C.4 and the guidance from NRC RIS-2005-31, Attachment 2, Appendix 1 (Fuel Cycle Facility Reviews).
5. The information sought to be withheld is not in the public domain, to the best of LES's knowledge and belief.



Stephen Cowne  
Chief Nuclear Officer and Compliance Manager  
Louisiana Energy Services, LLC

11/12/2019  
Date

I certify the above named person appeared before me and executed this document on this 12<sup>th</sup> day of November 2019.



Notary Public  
My commission expires: June 11, 2020



OFFICIAL SEAL  
Veronica Romero  
NOTARY PUBLIC  
STATE OF NEW MEXICO  
My Commission Expires 6/11/2020