

LES-19-164-NRC

NOV 21 2019



Attn: Document Control Desk
Director
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: Revision to LAR 19-06 Addition to Conditions of Materials License for CAAS

Reference: LAR 19-06 Addition to Conditions of Materials License for CAAS (LES-19-110-NRC / ADAMS Accession Number ML19281C336)

Pursuant to 10 CFR 70.17, Specific Exemptions, and in accordance with 10 CFR 70.34, Amendment of Licenses, Louisiana Energy Services, LLC, dba URENCO USA (UUSA), herewith requests an amendment to Materials License SNM-2010.

This License Amendment Request (LAR) proposes an addition to conditions of Materials License SNM-2010 to allow exemption from 10 CFR 70.24, Criticality Accident Requirements. UUSA proposes that an exemption from 10 CFR 70.24 requirements be authorized for circumstances in which the Criticality Accident Alarm System (CAAS) is not functional and is either returned to service within a specified period of time or compensatory measures have been employed.

Enclosure 1 provides a description and analysis of the proposed change, basis for the change, and safety significance of the proposed change. The information in Enclosure 1 is intended to replace the original request submitted in the Reference document.

Should there be any questions concerning this submittal, please contact Scott Diggs, Acting Licensing and Performance Assessment Manager at 575.394.6203.

Respectfully,

A handwritten signature in black ink, appearing to read "Stephen Cowne", followed by the text "LOUISIANA SERVICES FOR" in a smaller, less legible font.

Stephen Cowne
Chief Nuclear Officer and Compliance Manager

Enclosures: 1) Description of Proposed Changes (LAR 19-06)
2) Affidavit

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CC:

Kevin Ramsey, Senior Project Manager
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**Enclosure 2
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-19-164-NRC Enclosure 1 Description of Proposed Changes (LAR-19-06)
2. The information contained in the document cited in 1 above for which exemption from public disclosure is requested is proprietary information related to commercial aspects of the URENCO USA Facility. LES requests that this information 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 and the guidance contained in NUREG-1556, Vol. 20, Appendix C.4.

Stephen Cowne for

11/21/19

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

Date

I certify the above named person appeared before me and executed this document on this 21st day of November 2019.

Verónica Romero

Notary Public
My commission expires: June 16, 2020



OFFICIAL SEAL
Verónica Romero
NOTARY PUBLIC
STATE OF NEW MEXICO
My Commission Expires June 16, 2020