

JAN 07 2020

LES-20-00007-NRC



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: Integrated Safety Analysis Summary Annual Update

In accordance with 10 CFR 70.72(d)(3), Louisiana Energy Services, LLC, dba URENCO USA (UUSA), herewith submits the Integrated Safety Analysis Summary Annual Update which incorporates changes made during the 2019 calendar year.

Enclosure 1 contains the marked up pages to the Integrated Safety Analysis Summary, revisions 30 and 30a. A description of each change is provided in the revision history. Revision bars, strikethroughs, and underlines were utilized.

Enclosure 1 contains proprietary information. Therefore, UUSA requests Enclosure 1 of this letter be withheld from public disclosure in accordance with 10 CFR 2.390(a)(4). The Enclosure 2 affidavit supports this withholding request.

If you have questions concerning this submittal, please contact Wyatt Padgett, Licensing and Performance Assessment Manager at 575.394.5257.

Respectfully,

A handwritten signature in black ink, appearing to read "Stephen Cowne", is written over a horizontal line.

Stephen Cowne
Chief Nuclear Officer and Compliance Manager

Enclosures: 1) Marked up pages of the Integrated Safety Analysis Summary
2) Affidavit

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cc: via email

Kevin Ramsey, Project Manager - UUSA
U.S. Nuclear Regulatory Commission
Kevin.Ramsey@nrc.gov

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Enclosure 1

Marked up pages of the Integrated Safety Analysis Summary
(Revision bars, strikethroughs and underlines utilized)


**Enclosure 2
AFFIDAVIT**

I, Stephen Cowne, Chief Nuclear Officer and Compliance Manager at the URENCO USA Facility, make the following representations that to the best of my knowledge and belief:


1. LES wishes to have withheld from public disclosure the following document:

Enclosure 1 - Marked up pages of the Integrated Safety Analysis Summary

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.
5. The information sought to be withheld is not available in public sources, to the best of LES' knowledge and belief.

 1/7/2020
Stephen Cowne Date
Chief Nuclear Officer and Compliance Manager
Louisiana Energy Services, LLC
URENCO USA

I certify the above named person appeared before me and executed this document on this 7th day of January 2020.


Notary Public
My commission expires: June 16, 2020



OFFICIAL SEAL
Verónica Romero
NOTARY PUBLIC
STATE OF NEW MEXICO
My Commission Expires 6/16/2020