


NRC FORM 7 (07-2019) 10 CFR 110		U. S. NUCLEAR REGULATORY COMMISSION		APPROVED BY OMB: NO. 3150-0027 EXPIRES: 02/28/2022 <small>Estimated burden per response to comply with this mandatory collection request 2.4 hours. This submittal is reviewed to ensure that the applicable statutory, regulatory, and policy considerations are satisfied. Send comments regarding burden estimate to the Information Services Branch (T-6 A10M), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by e-mail to Infocollects.Resource@nrc.gov, and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202, (3150-0027), Office of Management and Budget, Washington, DC 20503. If a means used to impose an information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.</small>	
 APPLICATION FOR NRC EXPORT OR IMPORT LICENSE, AMENDMENT, RENEWAL, OR CONSENT REQUEST(S) (See Instructions on Pages 4 and 5)					
PART A. FOR NRC USE ONLY		<input checked="" type="checkbox"/> Public OR <input type="checkbox"/> Non-Public		Date Received 11/23/20 JMS	
License Number XCOM1336		Docket Number 11006401		Adams Accession Number	
PART B. TO BE COMPLETED FOR ALL LICENSES, AMENDMENTS, RENEWALS, OR CONSENT REQUESTS (If more space is needed to complete any of the items, use Pages 3-4 first, and then attach additional sheets, if necessary.)					
1. Name and Address of Applicant/Licensee Orano Federal Services 4747 Bethesda Avenue, Suite 1001, Bethesda, MD 20814 U.S.A.		1a. Name of Applicant's Contact Bruno Huguet		1b. Applicant's Reference Number	
		1c. Office Telephone Number (803)-335-7885		1d. Office Facsimile Telephone Number	
		1e. Applicant's E-mail Address bruno.huguet@orano.group			
2. Type of Action Requested (Check one)		<div style="display: flex; justify-content: space-between;"> <div> <input checked="" type="checkbox"/> Export (Parts B, C, E) <input type="checkbox"/> Amendment/Renewal <input type="checkbox"/> Import (Parts B, D, E) <input type="checkbox"/> Consent Request (Parts B, C) </div> <div> Current License Number: </div> </div>			
3. Contract Number(s) Intra-group sale agreement 20C3023562		4. First Shipment Date 10/22/2020		5. Last Shipment Date 02/26/2021	
		6. Proposed Expiration Date 10/22/2021			
PART C. TO BE COMPLETED FOR EXPORT LICENSES, AMENDMENTS, OR RENEWALS (If more space is needed to complete any of the items, use Pages 3-4 first, and then attach additional sheets, if necessary.)					
7. Name(s)/Address(es) of U. S. Suppliers and/or other U. S. Parties to the Export Orano Federal Services 4747 Bethesda Avenue, Suite 1001, Bethesda, MD 20814 U.S.A.		8. Name(s)/Address(es) of Intermediate Foreign Consignee(s) N/A		9. Name(s)/Address(es) of Ultimate Foreign Consignee(s) Orano Cycle Etablissement de Melox Lieu-dit La Tourette 30200 CHUSCLAN France	
7a. Function(s) Performed/Service(s) Provided Exporter		8a. Intermediate Use(s) N/A		9a. Ultimate End Use(s) Orano Cycle Etablissement de Melox	
10. Description of Radioactive Materials, Sealed Sources, Nuclear Facilities, Equipment, or Components; for Nuclear Equipment include Total Dollar Value of Equipment for Export This is new spare parts and accessories (from canceled DOE/NNSA US MFFF project) including associated quality documentation to be used in existing MOX fabrication plant (Orano Melox) France: • baskets/pots • welding machine, material crusher, sieve, mixer screw conveyor and measurement instruments • approximate combined value of XXXXXXXXXX Additional information on page 3		10a. Maximum Total Volume/Element WGT (KG), or Total Activity (TBq) N/A		10b. Max Enrichment or WGT% N/A	
				10c. Max Isotope WGT (KG) N/A	
11. Foreign origin (or obligations by country and, if known, by percentage of maximum total volume) N/A					

NRC FORM 7
(07-2019)
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U. S. NUCLEAR REGULATORY COMMISSION

**APPLICATION FOR NRC EXPORT OR IMPORT
LICENSE, AMENDMENT, RENEWAL, OR CONSENT REQUEST(S) (Continued)**

License Number XCOM1336	Docket Number 11006401	Adams Accession Number	<input checked="" type="checkbox"/> Public OR <input type="checkbox"/> Non-Public
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PART D. TO BE COMPLETED FOR IMPORT LICENSES, AMENDMENTS, OR RENEWALS

(If more space is needed to complete any of the items, use Pages 3-4 first, and then attach additional sheets, if necessary.)

12. Name(s)/Address(es) of Foreign Suppliers and/or other Foreign Parties to Import	13. Name(s)/Address(es) of Foreign or U. S. Intermediate Consignee(s)	14. Name(s)/Address(es) of Ultimate U. S. Consignee(s)	
12a. NRC Export License Number(s) (if applicable)	13a. License Number(s) / Expiration Date(s)	14a. License Number(s) / Expiration Date(s)	
	13b. Intermediate Use(s)	14b. Ultimate End Use(s)	
15. Description of Radioactive Materials, Sealed Sources, Nuclear Facilities	15a. Maximum Total Volume/ Element WGT (KG), or Total Activity (TBq)	15b. Max Enrichment or WGT%	15c. Max Isotope WGT (KG)

16. Foreign obligations (By country and by Percentage of Maximum Total Volume)


PART E. TO BE COMPLETED FOR ALL LICENSES, AMENDMENTS, RENEWALS OR CONSENT REQUEST(S)

(If more space is needed to complete any of the items, use Pages 3-4 first, and then attach additional sheets, if necessary.)

17. Additional Information provided on pages 3, 4, and/or separate sheets? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	17a. Copies of Recipient's Authorizations Provided? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
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18. Certification:

I, the applicant's authorized official, hereby certify that this application is prepared in conformity with Title 10, Code of Federal Regulations, and that all information provided is correct to the best of my knowledge.

18a. Print Name and Title of Authorized Official Bruno Huguet	18b. Signature -- Authorized Official  Digitally signed by HUGUET Bruno Date: 2020.10.26 07:52:01 -04'00'	18c. Date
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NRC FORM 7

(07-2019)
10 CFR 110

U. S. NUCLEAR REGULATORY COMMISSION

APPLICATION FOR NRC EXPORT OR IMPORT
LICENSE, AMENDMENT, RENEWAL, OR CONSENT REQUEST(S) (Continued)

License Number

XCOM1336

Docket Number

11006401

Adams Accession Number



Public

OR



Non-Public

Additional Information (Reference applicable block numbers from page 1 and/or page 2 for each entry)

Continued from box 10

OFS will be sending certain new and unused equipment from the canceled DOE/NNSA Mixed Oxide Fuel Fabrication Facility project in the United States to the Orano Melox Fuel Fabrication Plant in France to be used as new spare parts and accessories at that facility. The equipment is used in training and supplement actual production line in the facility, and includes basket/pots; welding machine; material crusher; sieve and mixer; screw conveyor; and measurement instruments. This equipment is described in more detail below:

ITEM#	SYSTEM NAME	EQUIPMENT NAME	QTY	CATID
1	BASKET	DUST POT	19	CAT ID 6629
2	BASKET	LCT MO-BOAT	10	CAT ID 6633
3	BASKET	PELLET MO-BOAT	602	CAT ID 6630
4	BASKET	PELLET MO-SHOE	96	CAT ID 6631
5	BASKET	STAINLESS STEEL BOX	140	CAT ID 6651
6	ROD CLADDING AND DECONTAMINATION	WELDING GENERATOR	1	CAT ID 6967
7	SCRAP PROCESSING	CRUSHER	1	CAT ID 103378
8	FINAL DOSING	SIEVING MACHINE	1	CAT ID 8833
9	HOMOGENIZING AND PELLETIZING	LODIGE MIXER SYSTEM	1	CAT IDs 23926,
24812,24811,24809				
12	HOMOGENIZING AND PELLETIZING	SCREW CONVEYOR	1	CAT ID 79501
13	QUALITY CONTROL AND MANUAL SORTING	CHAMFER and DISHING DIAMETER MEASUREMENT	1	CAT ID 18526
STATION				
14	QUALITY CONTROL AND MANUAL SORTING	PELLET DIAMETER MEASUREMENT STATION	1	CAT ID 26891,
92186				
15	QUALITY CONTROL AND MANUAL SORTING	PELLET DISHING DEPTH MEASUREMENT STATION	1	CAT ID 26892
16	QUALITY CONTROL AND MANUAL SORTING	PELLET LENGTH MEASUREMENT STATION	1	CAT ID 26780
17	QUALITY CONTROL AND MANUAL SORTING	PELLET MEASURING DEVICE (ATI MACHINE)	1	CAT ID 09046
18	QUALITY CONTROL AND MANUAL SORTING	PELLET PERPENDICULARITY MEASUREMENT	1	CAT ID 26890
STATION				
19	QUALITY CONTROL AND MANUAL SORTING	ROUGHNESS MEASUREMENT STATION	1	CAT ID 26893



October 2, 2020
FS-20-0132

David Skeen, Deputy Director
Office of International Programs
U.S. Nuclear Regulatory Commission
11555 Rockville Pike
Rockville, MD 20852

Subject: Orano Export License Application

Dear Deputy Director Skeen,

Enclosed in Attachment 1 is an NRC export license application (NRC Form 7) for authorization to export excess equipment from the cancelled MOX program that we are purchasing from the Department of Energy. These items are new equipment and have never been exposed to or contaminated with radioactive materials. Essentially spare parts, they will be used in manufacturing nuclear power fuel rods at the Orano fuel fabrication Melox plant in France.

The export license application contains confidential information within the meaning of Exemption 4 of the Freedom of Information Act (5 U.S.C. § 552(b)(4)) and 10 C.F.R. § 2.390, and therefore certain information within the application should be withheld from public disclosure. A redacted version of the export license application, which can be made public, is provided as Attachment 2. The supporting affidavit required by 10 C.F.R. § 2.390 is contained in Attachment 3.

Should you have any questions or comments concerning this request, please do not hesitate to contact our general council, Mike Woods at (202) 748-3673/Michael.woods@orano.group

Sincerely,

Gilles Rousseau
Senior Vice President / COO
Orano Federal Services LLC

Enclosures: Attachment 1, Completed NRC Form 7 Application (Non-Public)
Attachment 2, Redacted NRC Form 7 Application (Public)
Attachment 3, 10 C.F.R § 2.390 Affidavit

Cc: Amy Roma, Hogan Lovells US LLP
Mike Woods, General Council Orano US

**WITHHOLD FROM PUBLIC DISCLOSURE UNDER 10 CFR 2.390
UPON REMOVAL OF ATTACHMENT 1, DOCUMENT CAN BE MADE PUBLIC**

ATTACHMENT 3

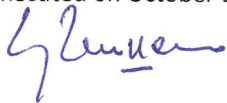
AFFIDAVIT

I, Gilles Rousseau, hereby affirm and state as follows:

- (1) I am the Senior Vice President/COO of Orano Federal Services ("OFS"), and I have been authorized to execute this affidavit on behalf of OFS.
- (2) I am submitting this affidavit in accordance with the U.S. Nuclear Regulatory Commission's ("NRC's") regulations at 10 C.F.R. § 2.390 in conjunction with an NRC specific export license application set forth in Attachment 1 to this transmittal.
- (3) In accordance with 10 C.F.R. § 2.390, it is requested that certain bracketed information set forth in Block 10 of the NRC Form 7, which is contained in Attachment 1, be withheld from public disclosure.
- (4) In making this application for withholding of proprietary information of which it is the owner, OFS believes that the information qualifies for withholding under the exemption from disclosure set forth in the Freedom of Information Act ("FOIA"), 5 U.S.C. Section 552(b)(4), the Trade Secrets Act, 18 U.S.C. § 1905, and NRC regulations 10 CFR § 9.17(a)(4) and 2.390(a)(4) for trade secrets and commercial or financial information because:
 - i. This information is and has been held in confidence by OFS, and our customer has asked us to maintain this information in confidence.
 - ii. This information is of a type that is customarily held in confidence by OFS, and there is a rational basis for doing so because the information contains sensitive commercial information about OFS's product, pricing, and customers.
 - iii. The information is being transmitted to the NRC voluntarily and in confidence.
 - iv. This information is not available in public sources and could not be gathered readily from other publicly available information.
 - v. Public disclosure of this information would create substantial harm to the competitive position of OFS by disclosing OFS's product, pricing, and customer information. Development and evaluation of this proprietary information was achieved at a significant cost to OFS, and disclosure could lead to additional significant cost or competitive harm to OFS.
 - vi. OFS's competitive advantage will be lost if its competitors are able to use the results of OFS's activities to aid their own commercial activities. The value of this information to OFS would be damaged if the information were disclosed to the public. Making such information available to competitors without their having been required to undertake a similar expenditure of resources would unfairly provide competitors with a windfall, and deprive OFS of the opportunity to exercise its competitive advantage to seek an adequate return on its significant investment.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on October 1, 2020.



Gilles Rousseau
Senior Vice President/COO
Orano Federal Services LLC



11/19/2020
FS-20-0132-1

David Skeen, Deputy Director
Office of International Programs
U.S. Nuclear Regulatory Commission
11555 Rockville Pike
Rockville, MD 20852

Subject: Supplement to Orano October 2, 2020 Export License Application

Dear Deputy Director Skeen,

Orano Federal Services LLC
4747 Bethesda Avenue
Suite 1001
Bethesda, MD 20814
Tel: +1 (301) 841-1732

On October 2, 2020, Orano Federal Services LLC (Orano) submitted an application to the U.S. Nuclear Regulatory Commission (NRC) to export fuel fabrication equipment from the United States to Orano Cycle's Etablissement de Melox (Melox) in France (the Application). Following discussions with the NRC staff, Orano is providing this supplement to the Application to offer more information about the planned export and to assist the NRC and Executive Branch in their review.

******Due to pressing business and U.S. federal government needs, Orano requests that the NRC complete action and issue the requested export license by 04/15/2021.******

I. Additional Information on the Equipment to be Exported

Box 10 (Description of Equipment) – The equipment to be exported and described in Box 10 of the Application (Equipment) consists of excess fuel fabrication equipment from the cancelled Mixed oxide (MOX) Fuel Fabrication Facility (MFFF) to be constructed at the U.S. Department of Energy (DOE) Savannah River Site near Aiken, South Carolina. It would be shipped to Melox in France to assist with MOX fuel fabrication there, serving as spare parts for the facilities already in operation.

Although the Equipment may be used for MOX fuel fabrication once at Melox, this export does not transfer any new capability to France in the area of MOX fuel fabrication, and does not otherwise raise national security or proliferation concerns:

- This Equipment is identical to traditional uranium fuel fabrication equipment, and is not specially designed for MOX fuel fabrication. This Equipment would be used for spare parts for Melox only, and does not require specialized technology compared to traditional uranium fuel fabrication.
- This Equipment is already based on French-origin technology, and the detailed designs of the Equipment are already in French possession. In fact, Orano was an indirect 30% participant in the US MFFF project, and the MOX fuel technology to be used at the MFFF was based on French-origin technology already in use at Melox.

- This Equipment will serve as spare parts for fuel fabrication lines already in operation at Melox, and will not otherwise enhance Melox's MOX fuel capabilities.

Box 16 (Foreign Obligations) – Except for the item listed below, all of the Equipment listed in the Application was manufactured in the United States:

- **Item #8, Sieving Machine (Forced Sieve MF3) – FreNuc SA, Route du Coteau, 7 Granges Paccot, CH1763 Switzerland**

There are no foreign obligations on the Equipment that we are aware of that would impact their use at Melox. Their end use remains the same (MOX fuel fabrication), just the location of use (France versus United States) is different.

II. Additional Information on Shipment Plan

Boxes 4-5 (Shipment Dates) – The exact dates of the shipment will depend on the timing of NRC's issuance of the export license. Presuming the Application is approved by the requested date of 04/15/2021, then the shipment dates would be approximately:

- Anticipated First Shipment Date: 06/15/2021
- Anticipated Last Shipment Date: 09/15/2021

Box 6 (Proposed Expiration Date) – The shipment or shipments are anticipated to occur in short order upon issuance of the export license. We understand from discussions with the NRC staff that a five-year license term is standard for this type of license, and thus the expected license expiration date would be 5 years from the date of submission of the Application, or October 2, 2025.

Box 7 (U.S. Suppliers/Parties to Export) – The information provided in Box 7 of the Application pertains to the corporate address for Orano Federal Services LLC, the ultimate U.S. exporting party. To provide further detail as to the planned shipment:

- The Equipment is currently owned by DOE and located as the DOE Savannah River Site near Aiken, South Carolina. DOE will sell the Equipment to Orano before its export to Melox, approximately around April-July 2021.
- After the sale of the Equipment to Orano, it will be transferred to the custody of Orano TN, an Orano affiliate, who will prepare the Equipment for shipment prior to export. The address where the Equipment will be held is Orano TN Americas, 357 Woodward Drive, Aiken, SC 29803, USA.
- At the time of the export, the Equipment will be shipped directly from the Orano TN facility (USA) to Orano Cycle – Etablissement de Melox (France) in Lieu-dit La Tourette, CHUSCLAN 30200.



III. Request for Expedited Review

As stated above, Orano requests NRC issuance of the export license by 04/15/2021. First, DOE needs to move the Equipment from the former MFFF site as soon as possible to facilitate its work to repurpose the MFFF site for other national security purposes. Second, the Equipment should arrive at Melox by September 2021 to smoothly fit into Melox's facility operations.

* * *

Should you have any questions or comments concerning this supplement or the earlier Application, please do not hesitate to contact our General Counsel, Mike Woods at (202) 748-3673/Michael.woods@orano.group.

Sincerely,

A handwritten signature in blue ink, appearing to read "G. Rousseau".

Gilles Rousseau
Senior Vice President / COO
Orano Federal Services LLC

Cc: Barry Miller, U.S. Nuclear Regulatory Commission
Mike Woods, Orano USA LLC
Amy Roma, Hogan Lovells US LLP
Sachin Desai, Hogan Lovells US LLP