



October 8, 2008  
AET 08-0071

Mr. Michael F. Weber  
Director, Office of Nuclear Material Safety and Safeguards  
Attention: Document Control Desk, Mail Stop TWFN-2F1  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555-0001

**American Centrifuge Plant  
Docket Number 70-7004; License Number SNM-2011  
Submittal of Engineering Analysis Related to Implementation of Order (EA-07-140)  
Imposing Additional Security Measures for the American Centrifuge Plant (TAC L32307)**

Dear Mr. Weber:

On July 26, 2007, USEC Inc. (USEC) provided a 20-day response (Reference 1) to the U.S. Nuclear Regulatory Commission (NRC) regarding an Order issued on July 5, 2007, imposing additional security measures for the American Centrifuge Plant (ACP). In a meeting with NRC staff in Rockville, MD on March 25, 2008, USEC presented our preliminary analysis and plans for compliance with the Order.

NRC staff conducted a follow-up conference call with USEC staff on August 12, 2008 requesting confirmation of the certainty in USEC's methodology presented during the March 25, 2008 closed meeting. Enclosure 1 of this letter provides USEC's findings as documented within EE-3908-0001 (Revision 0) entitled "Engineering Analysis to Establish Critical Target Areas for the American Centrifuge Plant and Identify Additional Security Measures (U)." As requested by Reference 2, this analysis documents the evaluation of the Integrated Safety Analysis events that indicated "high" consequences. Attachment A of this Engineering Analysis provides the case summaries for the additional consequence analyses that were performed using the RASCAL consequence modeling software and is being submitted under separate cover (AET 08-0072). As discussed with NRC staff, it is anticipated that a revision to this analysis will be submitted following the finalization of the planned Feed and Withdrawal design changes.

USEC requests that NRC complete their review within 30 days of receipt of this submittal. Upon NRC notification of agreement with the Engineering Analysis, USEC will develop an action plan to meet the imposed additional security measures and submit it to the NRC for review.

~~Secret~~ - National Security Information

When separated from Enclosure 1, this cover letter is uncontrolled.

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If you have any questions regarding this matter, please contact me at (301) 564-3470 or Charles D. Ladd at (740) 897-3145.

Sincerely,



Peter J. Miner  
Director, Regulatory and Quality Assurance

cc (without enclosure unless noted):

- J. Downs, NRC HQ (w/enclosure)
- K. Everly, NRC HQ
- J. Henson, NRC Region II
- B. Smith, NRC HQ
- D. Tiktinsky, NRC HQ (w/enclosure)

References:

1. USEC letter AET 07-0046 to M.F. Weber (NRC) from P.J. Miner (USEC) regarding Response To Order Imposing Additional Security Measures for the American Centrifuge Plant (EA-07-140) – USEC Proprietary Information and Security-Related Sensitive Information, dated July 26, 2007
2. NRC letter to P.J. Miner (USEC) from S. Echols (NRC) regarding Review of the American Centrifuge Plant Critical Target Area Analysis (TAC L32307), dated August 1, 2008