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21G-08-0212
GOV-01-55-04
ACF-08-0419

December 22, 2008

Director
Office of Nuclear Material Safety and Safeguards
U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555

- References:
- 1) Docket No. 70-143; SNM License 124
 - 2) NRC Inspection Report No. 70-143/2008-202 and Notice of Violation, dated April 24, 2008
 - 3) NFS Letter, B. M. Moore to NRC, "Reply to Notice of Violation No. 70-143/2008-202-01", 21G-08-0067, dated May 23, 2008
 - 4) NFS Letter, B. M. Moore to NRC, "Extend Commitment Date in Reply to Notice of Violation No. 70-143/2008-202-01", 21G-08-0141, dated August 29, 2008

Subject: Request to Amend SNM-124 to Clarify Requirements for Reflection and Normal Case Conditions

Dear Sir:

In Reference 3 above, Nuclear Fuel Services, Inc. (NFS) stated that a license amendment request would be prepared to simplify the requirements in SNM-124 regarding reflection and normal case conditions for Nuclear Criticality Safety Evaluations. In Reference 4, NFS proposed to submit the license amendment request by December 31, 2008 rather than the original commitment date of August 29, 2008. However, SNM-124 is due to be submitted for license renewal by June 30, 2009, and NFS has already begun updating the Nuclear Criticality Safety chapter (currently Chapter 4, will become new Chapter 5) to incorporate the format and content specified in NUREG-1520.

Rather than our normal practice of submitting a revision of the current Chapter 4 (in its entirety), NFS would like to request that NRC consider amending SNM-124 by License Condition using the following wording.

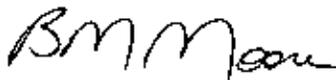
Notwithstanding the reflection requirements for individual units and multiple units or arrays in Chapter 4 of the application, NFS shall consider credible amounts of reflection for normal and credible abnormal conditions. The amount of reflection for both normal and credible abnormal conditions shall be justified in the Nuclear Criticality Safety Evaluation.

This and other existing commitments and License Conditions related to Nuclear Criticality Safety will be reviewed for incorporation into the new Chapter 5 of the License Renewal submittal due in June 2009.

If you or your staff have any questions, require additional information, or wish to discuss this, please contact me, or Mr. Randy Shackelford, Nuclear Criticality Safety Manager, at (423) 743-2504. Please reference our unique document identification number (21G-08-0212) in any correspondence concerning this letter.

Sincerely,

NUCLEAR FUEL SERVICES, INC.



B. Marie Moore
Vice President,
Safety and Regulatory

JKW/rcy

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