



**NUCLEAR FUEL SERVICES, INC.**  
 a subsidiary of The Babcock & Wilcox Company

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21Y-09-0001  
 NFE-09-0010  
 GOV-01-55-04  
 ACF-09-0004  
 January 30, 2009

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) Letter from B. M. Moore to NRC, Revisions to Unclassified Integrated Safety Analysis Summaries for Calendar Year 2008 (21G-09-0001), dated January 28, 2009

**Subject: Revisions to Classified Integrated Safety Analysis Summaries for Calendar Year 2008**

Dear Sir:

In accordance with Title 10, Code of Federal Regulations, Part 70.72, and SNM-124 License Condition S-25, Nuclear Fuel Services, Inc. (NFS) hereby submits revisions to the subject Integrated Safety Analysis (ISA) Summaries that reflect changes implemented in Calendar Year 2008. Changes are denoted by vertical lines in the margin of the affected pages and are summarized in the Record of Revision of the affected ISA Summary. Each Record of Revision also denotes the specific Internally Authorized Changes (a brief summary of which are provided under separate cover letter) that were implemented for this period to assist in your review. Additional *unclassified* ISA Summaries are being submitted under separate cover letter (Reference 2).

**The attached documents contain CONFIDENTIAL RESTRICTED DATA, as defined by Classification and UCNI Guide for Safeguards and Security Information, CG-SS-4. The unauthorized disclosure of information contained in these documents is prohibited by law.**

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The documents and drawings enclosed herewith are being submitted to the NRC for docketing in the NFS Erwin License Docket (Reference 1). Said enclosures contain NFS proprietary information, as set forth in the enclosed affidavit in accordance with 10 CFR 2.390(a)(4).

The drawings enclosed herewith have the following statement affixed:

*"This drawing and all information contained herein is the property of Nuclear Fuel Services, Inc. and shall not be used or disclosed for any purpose other than that for which it has been furnished without the express written consent of NFS."*

Notwithstanding the language of this restriction, NFS acknowledges that reproduction and controlled distribution of submitted documents, in accordance with NRC regulations and requirements, is necessary in order for the NRC to carry out its legal and regulatory responsibilities. Further, NFS acknowledges that reproduction and controlled distribution of these drawings by a third party authorized by the NRC is allowable by this language. Therefore, it is NFS' position that the enclosed drawings may be reproduced and distributed in a controlled manner, by a third party authorized by the NRC, for NRC's purposes and use without violation of the statement above.

If you or your staff have any questions, require additional information, or wish to discuss this matter, please contact me, or Mr. Rik Droke, Licensing and Compliance Director, at (423) 743-1741. Please reference our unique document identification number (21Y-09-0001) in any correspondence concerning this letter.

Sincerely,

**NUCLEAR FUEL SERVICES, INC.**



B. Marie Moore  
Director of Safety and Regulatory

JKW/pdj  
Enclosure/Attachment

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Copy:

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ENCLOSURE

AFFADAVIT  
TRADE SECRETS OR COMMERCIAL INFORMATION

(2 pages)

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AFFIDAVIT  
**TRADE SECRETS OR COMMERCIAL INFORMATION**

I, B. Marie Moore, Director of Safety and Regulatory at Nuclear Fuel Services, Inc. (NFS), that to the best of my knowledge and beliefs (and in reliance on the Contractor affidavit attached hereto, if applicable), make the following representation contained herein:

- A. The following document which Nuclear Fuel Services, Inc. (NFS) wishes to have withheld from public disclosure is the Attachment to NFS letter (21Y-09-0001), dated January 30, 2009:

**Revisions to Classified Integrated Safety Analysis Summaries  
For Calendar Year 2008:**

- 300 Complex Production Areas 100 to 900 ISA Summary, Rev. 5 (21X-09-0002/NFE-09-0002)**
- 300 Complex Recovery ISA Summary, Rev. 5 (21X-09-0003/NFE-09-0003)**
- 300 Complex Support Systems ISA Summary, Rev. 5 (21X-09-0004/NFE-09-0004)**
- Building 105 Laboratory ISA Summary, Rev. 5 (21X-09-0001/NFE-09-0001)**
- Waste Water Treatment Facility ISA Summary, Rev. 5 (21X-09-0005/NFE-09-0005)**

- B. The information contained in the document cited in A above has been held in confidence by Nuclear Fuel Services, Inc. (NFS), or its Contractor, in that it contains trade secrets or commercial information as specified in Title 10, Code of Federal Regulations, Part 2.390(a). The basis for requesting that this document(s) be withheld from public disclosure is explicitly marked on the cover page to each of the aforementioned documents and/or the top of each affected page in accordance with 10 CFR 2.390(b)(i)(B).
- C. The information contained in the document cited in A above is the intellectual property of Nuclear Fuel Services, Inc. (NFS), or its Contractor, and as such is customarily held in confidence by Nuclear Fuel Services, Inc. (NFS). As such, Nuclear Fuel Services, Inc. (NFS) has customarily submitted privileged and confidential information of this type to the Nuclear Regulatory Commission (NRC) and to its predecessor, the Atomic Energy Commission (AEC), in confidence.

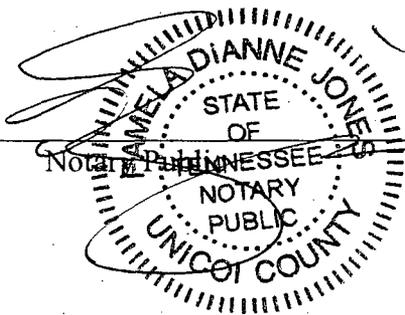
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- D. The information contained in the document cited in A above has not been made available to public sources by Nuclear Fuel Services, Inc. (NFS), nor has Nuclear Fuel Services, Inc. (NFS) authorized that it be made available. In accordance with Nuclear Fuel Services, Inc. (NFS) policies governing the protection and control of information, proprietary information contained herein has been made available, on a limited basis, to others outside NFS only as required and under suitable agreement providing for nondisclosure and limited use of the information.
  
- E. The public disclosure of the information contained in the document cited in A above is likely to cause substantial economic harm to the competitive advantage held by Nuclear Fuel Services, Inc. (NFS), or its Contractor. The basis for withholding said information is that it contains distinguishing aspects of a process, methodology, or component(s), the exclusive use of which provides a competitive advantage for NFS or its Contractor in product optimization or marketability.
  
- F. The proprietary information that Nuclear Fuel Services, Inc. (NFS) requests to be withheld from public disclosure is contained in the entire document as so marked.

B. Marie Moore      1/30/09  
B. Marie Moore      Date  
Director of Safety and Regulatory

I certify the above named person appeared before me and executed this document on this the 30<sup>th</sup> day of January, 2009.



My commission expires:  
9-28-2010

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**ATTACHMENT**

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For Calendar Year 2008:**

**300 Complex Production Areas 100 to 900 ISA Summary, Rev. 5  
(21X-09-0002/NFE-09-0002)**

**300 Complex Recovery ISA Summary, Rev. 5  
(21X-09-0003/NFE-09-0003)**

**300 Complex Support Systems ISA Summary, Rev. 5  
(21X-09-0004/NFE-09-0004)**

**Building 105 Laboratory ISA Summary, Rev. 5  
(21X-09-0001/NFE-09-0001)**

**Waste Water Treatment Facility ISA Summary, Rev. 5  
(21X-09-0005/NFE-09-0005)**

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