



December 24, 2008
AET 08-0095

Designated
Original

Patricia K. Holahan, Director
Division of Security Operations
Office of Nuclear Security and Incident Response
Attention: Document Control Desk, Mail Stop TWFN-2F1
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

**American Centrifuge Lead Cascade Facility
Docket Number 70-7003; License Number SNM-7003**

**American Centrifuge Plant
Docket Number 70-7004; License Number SNM-2011**

**Submission of Revised Security Program for the American Centrifuge Lead Cascade Facility
and American Centrifuge Plant for Approval—Export Controlled Information, Official Use
Only, and Security-Related Information – Withhold Under 10 CFR 2.390**

**INFORMATION TRANSMITTED HEREWITH IS PROTECTED FROM PUBLIC
DISCLOSURE AS CONFIDENTIAL COMMERCIAL OR FINANCIAL INFORMATION
AND/OR TRADE SECRETS PURSUANT TO 10 CFR 2.390**

AND

**INFORMATION TRANSMITTED HEREWITH IS PROTECTED FROM DISCLOSURE
PURSUANT TO 10 CFR PART 810**

Dear Ms. Holahan:

In accordance with 10 *Code of Federal Regulations* (CFR) 95.19, USEC Inc. (USEC) hereby submits a request for U.S. Nuclear Regulatory Commission (NRC) review of changes to the Security Programs for the American Centrifuge Lead Cascade Facility and American Centrifuge Plant. This request combines the two Security Programs. This change was determined not to decrease the effectiveness of plans and program in accordance with 10 CFR 70.32, however, this change is made to satisfy license commitments and therefore was determined to be a substantive change in accordance with 10 CFR 95.19 and requires NRC prior review and approval.

~~Export Controlled Information~~, Official Use Only, and
Security-Related Information – Withhold Under 10 CFR 2.390
When separated from enclosure, this cover letter is uncontrolled.

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The revised security program provides the necessary information to document satisfaction of the requirements of 10 CFR 70.22, 73.67, and 95.15 regarding plans for the physical protection of special nuclear material of low strategic significance at a fixed site and in-transit, a Standard Practice Procedures Plan for the protection of classified information, and physical security of special nuclear material of low strategic significance in transit (security program chapters 1, 2, and 3 respectively).

The proposed change satisfies commitments and conditions specified in the License Application for the American Centrifuge Plant in Piketon, Ohio, LA 3605-0001, the associated NRC Safety Evaluation Report for the American Centrifuge Plant in Piketon, Ohio (NUREG-1851), and the ACP Security Program NR-3605-004 summarized below:

- 1) Completion of the Intrusion Detection System design, advanced notification of the NRC, and submittal of the updated security program:

The design of the Intrusion Detection System was completed and approved by the NRC for the Lead Cascade System on May 30, 2006 (Reference 1). The revised Security Program uses the same system and it is described in the enclosed updated security program. As USEC continues to expand its Intrusion Detection System for the remainder of the facilities for American Centrifuge Plant, USEC will evaluate the changes in accordance with 10 CFR 70.72 and 70.32; and 10 CFR 95.19 and obtain NRC approval accordingly. This satisfies the following ACP License Application and NRC Safety Evaluation Report commitments and conditions:

License Application Sections:

1.2.6 Security of Classified Information

1.2.7 Security of Special Nuclear Material of Low Strategic Significance

NRC Safety Evaluation Report:

Appendix I, Section I.3.1.2

- 2) Identification of areas where classified information will be used or stored, security areas, and access control measures:

Specific locations for use and storage of classified matter have been identified. The revised Security Program identifies Security Areas, including Restricted Areas and Closed Areas, their access controls, and construction features. This satisfies the following NRC Safety Evaluation Report commitments and conditions:

SER 1.2.3.7.3

SER, Appendix I, Section I.3.1.2

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The proposed changes satisfy the requirements of American Centrifuge Plant License Condition number 22.

Enclosure 1 to this letter provides a detailed description, justification and significance determination for the proposed changes. Enclosure 2 provides a copy of the proposed Security Program with illustrated (redline/strikeout) changes and revisions. Enclosure 3 provides the proposed changed pages.

Enclosures 1, 2, and 3 contain Security-Related Information and should be withheld from public disclosure per 10 CFR 2.390. They have also been determined, in accordance with guidance provided by DOE, to contain information restricting use to Official Use Only. Enclosures 2 and 3 contain Export Controlled Information and must be protected from disclosure per the requirements of 10 CFR 810.

USEC requests that a Facility Clearance be issued for the American Centrifuge Plant.

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: J. Downs, NRC HQ – NMSS
K. Everly, NRC HQ – NSIR
J. Henson, NRC Region II
B. Smith, NRC HQ – NMSS

Enclosures: As Stated

References:

1. NRC letter from Stan Echols to Steven A. Toelle regarding American Centrifuge Lead Cascade Facility, Review of Security Intrusion Detection System