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21G-09-0036
GOV-01-55-04
ACF-09-0060
February 23, 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) NFS letter from B. Marie Moore to Director, Office of Nuclear Material Safety and Safeguards, dated August 31, 2007, (TAC L32653) License Amendment Request for Processing UF₆ in the CD Line Facility at the NFS Site
 - 3) NRC letter from Kevin Ramsey to B. Marie Moore, dated May 23, 2008 (TAC L32653), Nuclear Fuel Services, Inc., Request for Additional Information Concerning the CD Line Facility
 - 4) NFS letter from B. Marie Moore to Director, Office of Nuclear Material Safety and Safeguards, dated June 19, 2008, (TAC L32653) Responses to RAI Concerning the CD Line Facility

Subject: Submittal of NFS' CD Line Integrated Safety Analysis Summary, Revision 1

Dear Sir:

Nuclear Fuel Services, Inc. (NFS) hereby submits Revision 1 of the CD Line Integrated Safety Analysis (ISA) Summary for your use in preparation for the NRC's upcoming Readiness Review of this project. Revision 1 incorporates commitments made in Reference 4, as well as a few process changes that have occurred since the submittal of Revision 0 (Reference 2). A Record of Revision is included that provides a summary of each change to the document.

Information contained in the attached ISA Summary includes sensitive information and is marked "Official Use Only" in accordance with 5 U.S.C. 552, and is not suitable for public release.

The documents and drawings enclosed herewith are being submitted to the NRC for docketing in the NFS Erwin License Docket (Reference 1). The attached ISA Summary 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."

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nuclear fuel services, inc., a subsidiary of The Babcock & Wilcox Company

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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, please contact me, or Mr. Rik Droke, Licensing and Compliance Director, at (423) 743-1741. Please reference our unique document identification number (21G-09-0036) in any correspondence concerning this letter.

Sincerely,

NUCLEAR FUEL SERVICES, INC.



B. Marie Moore
Director of Safety and Regulatory

DMG/pdj
Attachment & Enclosure

Regional Administrator
U.S. Nuclear Regulatory Commission
Region II, Atlanta Federal Center
61 Forsyth Street, SW, Suite 23T85
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Mr. Manuel Crespo
Project Inspector
U.S. Nuclear Regulatory Commission
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Senior Resident Inspector
U.S. Nuclear Regulatory Commission

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ENCLOSURE

**AFFIDAVIT
TRADE SECRETS OR COMMERCIAL INFORMATION**

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

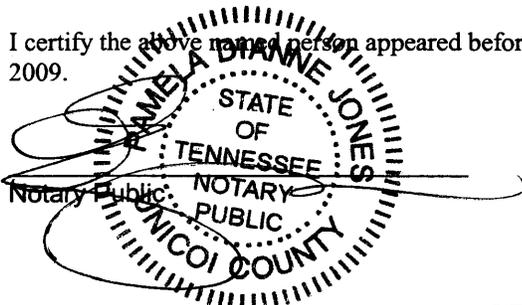
- A. The following document(s) which Nuclear Fuel Services, Inc. (NFS) wishes to have withheld from public disclosure are:

Attachment to NFS letter from B. M. Moore to Director, NMSS, NRC, dated February 23, 2009 (21G-09-0036), in its entirety.

- B. The information contained in the document(s) 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(s) 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.
- D. The information contained in the document(s) 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(s) 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(s) as so marked.

B. Marie Moore *2/23/09*
B. Marie Moore Date
 Director Safety & Regulatory

I certify the above named person appeared before me and executed this document on this the 23rd day of February, 2009.



My commission expires: *9-28-2010*

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Attachment
NFS CD Line
Integrated Safety Analysis Summary Revision 1 (21T-09-0019)
137 pages to follow

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