



10 CFR 2.390

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NEF-09-00059-NRC

Director  
Office of Nuclear Material Safety and Safeguards  
U.S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
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Rockville, MD 20852

Louisiana Energy Services, LLC  
National Enrichment Facility  
NRC Docket No. 70-3103

Subject: License Amendment Request for the National Enrichment Facility to change the applicability of Items Relied On For Safety to the Cylinder Receipt and Dispatch Building for Design Basis Events (LAR-09-07)

- References:
- 1) NEF-08-0095-NRC, License Amendment Request for the National Enrichment Facility to provide an alternate sole Item Relied On For Safety (IROFS) for minimizing UF<sub>6</sub> releases after a Design Basis Earthquake (DBE) (LAR-08-07).
  - 2) NEF-08-0269-NRC, Revision to the National Enrichment Facility License Amendment Request (LAR-08-07) to provide an alternate sole Item Relied On For Safety (for minimizing UF<sub>6</sub> releases after a Design Basis Earthquake (DBE).
  - 3) IN-09-00027-NRC, Safety Evaluation Report (SER) of Louisiana Energy Services Amendment Request for the National Enrichment Facility to Provide an Alternate Sole Item Relied On For Safety For Minimizing UF<sub>6</sub> Releases After a Design Basis Earthquake.
  - 4) NEF-09-00004-NRC, LAR-09-01, License Amendment Request for the Fundamental Nuclear Material Control Plan, Revision 7.

Louisiana Energy Services requests an amendment to the Materials License for the National Enrichment Facility to authorize changes in the applicability of IROFS for the Cylinder Receipt and Dispatch Building (CRDB) for natural phenomena events.

This amendment follows a similar methodology used for the Separations Building Module (SBM) License Amendment (Ref. 1 & 2) as reviewed previously in the Safety Evaluation Report (Ref. 3). This submittal proposes the removal of IROFS27c and its replacement with IROFS27e to the CRDB building superstructure/shell. Thus the CRDB superstructure will be designated as a QA Level-1 Graded structure, which will provide the quality control of the critical CRDB elements necessary to ensure IROFS27e

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performs its intended function. Activities performed to date on the CRDB superstructure designated at other quality levels will be evaluated by LES to confirm elements critical to the functionality of IROFS27e are met and QA Level 1G requirements are satisfied.

This proposed amendment also modifies sole IROFS27c and applies it to the CRDB "Bunkered Area" structure, which houses the rooms that were previously located in the Technical Services Building (TSB).

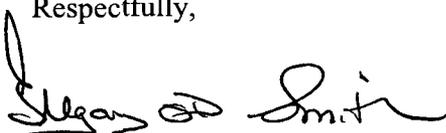
The submittal incorporates a description of the proposed changes (Enclosure 1) and Licensing Basis Document (LBD) markup pages including minor revisions to the LES Quality Assurance Program Description (QAPD), which adds the CRDB superstructure as a QA Level-1 Graded facility (Enclosure 2). Enclosure 2 requires NRC approval in accordance with 10 CFR 70.72(c). The submittal also includes a comprehensive set of LBD markup pages for information (Enclosure 3) to assist NRC in its review of this LAR. Enclosure 3 includes all LBD changes associated with the CRDB and TSB, including the changes encompassed in Enclosure 2 that require prior NRC approval.

Louisiana Energy Services requests that the information in the Emergency Plan in Enclosure 3 to this letter be withheld from public disclosure pursuant to Title 10 of the Code of Federal Regulations Part 2.390(a)(4). The Emergency Plan contains security related information and thus disclosure of it could pose a security vulnerability.

Note that this License Amendment Request contains mark-ups of Revision 7 of the Fundamental Nuclear Material Control Plan (FNMCP) which has been submitted for NRC approval (Ref. 4). The changes to the FNMCP are therefore dependent upon approval of LAR-09-01.

If you have any questions, please direct them to Steve Cowne, Director, Quality and Regulatory Affairs, at 505-394-5253.

Respectfully,



Gregory OD Smith  
Chief Operating Officer and Chief Nuclear Officer

- Enclosures:
- 1) Description of Proposed Changes
  - 2) Markup Pages to the Licensing Basis Documents
    - Requiring NRC approval
  - 3) Markup Pages to the Licensing Basis Documents
    - Comprehensive set

cc:

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