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NEF-09-00106-NRC

Attn: Document Control Desk Office of Nuclear Material Safety and Safeguards Washington, DC 20555-0001

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

Subject:

Integrated Safety Analysis Summary Update

Reference:

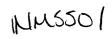
1) Letter from LES to NRC, NEF-09-00054, License Basis Documents

Update to reflect LAR-08-07, Mar 5, 2009

In accordance with 10 CFR 70.72(c), Louisiana Energy Services (LES) is allowed to make changes to Licensing Basis Documents under LES' approval authority. LES is required to furnish any changes made under such authority to the NRC in accordance with 10 CFR 70.72(d)(3) within 30 days of the end of the calendar year.

This letter provides an update to the Integrated Safety Analysis Summary. A total of 10 changes were made under revision 9a, 9b and 9c. The previous update of the ISA Summary was provided on Mar 5, 2009 (Ref. 1). As discussed with the NRC, LES was to provide the changes made that reflects the phased operation approach to the NRC upon completion. These changes are reflected as LBDCR 09-0046 and include, among other things, the creation of section 3.9.

ISAS section 3.9, Phased Approach, is being added to provide a description of the startup phased operation concept. Existing sections of the ISAS are written as though the facility was complete and operating. Section 3.9 identifies the differences between the descriptions in the existing ISAS and the actual configuration or operation. The existing ISAS sections were not changed except to add a "pointer" to the appropriate subsection of section 3.9 that describes the differences for the phased operation (Section 3.9 also includes a pointer to the applicable existing ISAS section). Some ISAS sections were not impacted and therefore do not have a pointer.



The changes do not include specific design details for system and components impacted by the phased operation approach. As these design details are obtained, section 3.9 will be updated as required to provide appropriate level of detail. The update to section 3.9 as well as the review and approval of the specific designs will be reviewed in accordance with 10 CFR 70.72(c) requirements.

The License Basis Documents are required to accurately reflect current plant configuration. Since the National Enrichment Facility will be in a dynamic state of operation during construction, section 3.9 was added to the ISA Summary to describe the phased operation approach that we are using for plant start up.

Attached as Enclosure 1 are the marked up pages to the Integrated Safety Analysis Summary as a result of each revision. Changes were made under revisions 9a, 9b and 9c and a description of each change is provided in the revision history. Revision bars, strikethroughs and underlines were utilized. A complete copy of the Integrated Safety Analysis Summary without revision bars, strikethroughs or underlines is attached as Enclosure 2.

If you have any questions, please contact Stephen Cowne, Director of Quality and Regulatory Affairs at (575) 394-5253.

Respectfully,

Chief Operating Officer and Chief Nuclear Officer

Enclosures:

- 1) Marked up versions of the ISA Summary, showing changes made under revisions 9a, 9b and 9c.
- 2) Clean copy of the ISA Summary, Revision 10

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