

August 12, 2009

Mr. Stephen Cowne, Director
Quality and Regulatory Affairs
Louisiana Energy Services, L.P.
P.O. Box 1789
Eunice, NM 88231

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION FOR LICENSE AMENDMENT
REQUEST TO MATERIALS LICENSE SNM-2010 FOR ALTERATIONS TO SOLE
IROFS FOR FIRE PROTECTION (LAR-09-011) (TAC No.L32839)

Dear Mr. Cowne:

We have reviewed your licensing amendment request transmitted by letter dated May 22, 2009, and additional information is needed before final action can be taken on your submittal. We are enclosing Requests for Additional Information and request you provide response within 30 days of this letter.

If you have any questions, please contact me at 301-492-3187, or Via e-mail Tyrone.Naquin@nrc.gov.

Sincerely,

/RA/

T. D. Naquin, Project Manager
Uranium Enrichment Branch
Fuel Facility Licensing Branch
Division of Fuel Cycle Safety
and Safeguards
Office of Nuclear Material Safety
and Safeguards

Enclosure: As stated

Docket No.: 70-3103
License No.: SNM-2010

cc: Gregory Smith/LES
Reinhard Hinterreither/LES
Clint Williamson/LES

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OFC	UEB	UEB	UEB	UEB
NAME	TNaquin	THristopoulos	RWescott	BSmith
DATE	8/ 5/2009	8/ 5/2009	8/ 5 /2009	8/12 /2009

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REQUEST FOR ADDITIONAL INFORMATION TO ADD SOLE ITEMS
RELIED ON FOR SAFETY FOR AN UNANALYZED ACCIDENT
INVOLVING THE ASSAY SAMPLING RIG (LAR-09-011)

1. Enclosure 1, Page 5, Paragraph 2, Proposed Changes.

For new facilities or new processes at existing facilities, 10 CFR 70.64(b)(1) requires that the facility and system design and facility layout must be based on defense-in-depth practices.

The design must incorporate to the extent practicable:

- (1) Preference for the selection of engineered controls over administrative controls to increase overall system reliability; and
- (2) Features that enhance safety by reducing challenges to IROFS.

Explain how, with the removal of IROFS 35, the facility complies with the Title 10 of the *Code of Federal Regulations* (10 CFR) 70.64 (b)(1), which requires the design to incorporate, to the extent practicable, preference for the selection of engineered controls over administrative controls.

2. Enclosure 1, Page 8, Section 3.2, Affected IROFS, IROFS36j (proposed)

The accident sequences in which IROFS36j helps prevent consequences have initiation frequencies based on operational experience. The staff expects that this operational experience includes the effects of normal fire prevention measures, such as control of ignition sources. These initiation frequencies are applicable to the National Enrichment Facility (NEF) facility because of the NEF fire prevention program described in Section 7.1.3 of the NEF License Application. The staff notes that according to Section 3.3.3.2, "Fire in the Ventilated Room", it is proposed to remove IROFS 37 after a configuration change is processed and use IROFS36j to meet the performance requirements for sequences FF25-2 c-f.

Explain how IROFS36j acts as an additional preventive control beyond that provided by the Louisiana Energy Services fire protection program as described in your license application and can be used to meet the performance requirements of 10 CFR 70.61 without IROFS 37.

10 CFR 70.65(b)(4) requires the integrated safety analysis summary to contain information that demonstrates the licensee's compliance with the performance requirements of 10 CFR 70.61.