

JAN 12 2010

LES-10-00010-NRC

Attn: Document Control Desk
Director
Office of Nuclear Material Safety and Safeguards
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

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

Subject: Louisiana Energy Services Operational Safety Program Readiness in Support
of NRC Operational Readiness Review

The Louisiana Energy Services, LLC (LES) Program Readiness Assessment has been completed for the Operational Safety Program. Readiness was validated by performance of an Operations self assessment. The Operational Safety Program assessment has been transmitted electronically to Cynthia Taylor for your review prior to the start of the NRC's Operational Readiness Review. The Operational Safety Program is ready for the NRC to inspect.

Operational Safety is implemented through the following programs (assessments have completed for each of these programs):

- Operator Training Program
- Nuclear Criticality Safety Program
- Fire Protection Program
- Radiation Protection Program
- Process Safety Information Program
- Transportation Program
- Management Organization and Controls Program
- Maintenance and Surveillance of Safety Controls Program
- Integrated Safety Analysis (ISA) Implementation Program
- Emergency Preparedness Program
- Environmental Protection Program
- Effluent Controls Program
- Permanent Plant Modification Program

In addition to the programs that implement Operational Safety other key components of Operational Safety include:

- Conduct of Operations (Procedure OP-3-1000-01)
- Items Relied on For Safety (IROFS) and Associated Management Measures – IROFS needed for the First Cascade on Line have been identified and discussed with the NRC.

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In addition to the programs listed above (with the exceptions noted below as applicable), the following are some of the items that can be inspected now:

- Shift Turnover meetings
- Plan of the Day meetings
- Control Room communications
- Operator monitoring and alarm response for IROFSC15 and C16 (CTF)
- Operator rounds and plant tours
- Coordination of maintenance and surveillance activities
- Resolutions of Problems affecting plant operation
- Operational history including shift logs
- Contaminations controls (CTF)
- Implementation of fire protection controls (CTF, hot work permitting)
- Procedure use and adherence
- Housekeeping
- Operations oversight of excavation activities
- Operations conduct of infrequently performed evolutions associated with commissioning and equipment turnover
- Operations work around program
- Control of chemical hazards

Exceptions to the programs that implement Operational Safety are as follows:

Exceptions to the Operator Training Program

- Operator Certification Program system qualifications will be completed as follows:

System:	Completion Date
Gaseous Effluent Ventilation System	January 22, 2010
Tails System*	January 27, 2010
Compressed Air System	**
Sampling	**
Product System*	**
Plant Control System (PCS)	**
Cascade and Dump Systems	**
Feed System*	**
Standby Diesels	**
Centrifuge Cooling Water System	**

* Delta Training between SP5 (Almelo) and NEF

** Classroom training has been completed for these systems as well as familiarity training at the Almelo plant. In addition, the operators are gaining familiarity with the LES systems during the testing and commissioning of these systems. Final system construction must be completed before the final qualification can be completed. The project schedule is currently being reviewed to finalize the completion dates of the training for these systems.

- IROFS and Operations Requirement Manual (ORM) training is on-going as Boundary Definition Documents and procedures are approved. Crews have been trained on a majority of the IROFS and associated ORM sections except for recently identified or revised IROFS, such as the IROFS50 series for Operating While Constructing. Training on these new or revised IROFS will be completed by February 15, 2010.

Exceptions to the Nuclear Criticality Safety Program:

- Verification of Safe-by-Design attributes for certain system components and miscellaneous components are not yet complete, pending receipt and/or final installation of these items – will be completed with the final verification of the Cascade Evacuation Rig by 3/3/2010.
- The Criticality Accident Alarm System (CAAS) installation and testing activities – will be completed by 1/15/2010.

Exceptions to the Fire Protection Program:

- Completion of construction activities in the SBM for the fire detection system and fire suppression system – will be completed by 2/3/2010.

Exceptions to the Transportation Program:

- The gantry crane is installed and functional. Rigging devices and procedures for cylinder handling during will be complete by 1/13/2010.
- Training for cylinder handling and NDA verification – will completed by 1/15/2010.

Exceptions to the Maintenance and Surveillance of Safety Controls Program:

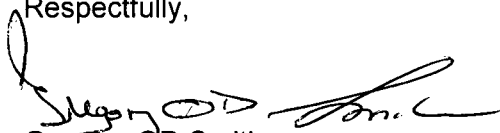
- Surveillance procedures for inspections and testing of IROFS35 fire barriers (penetration seals, fire doors, and fire dampers) for the UF6 Area – will be approved by 1/15/2010.
- Criticality Accident Alarm System (CAAS) installation and testing activities – will be completed by 1/15/2010.

Exceptions to the Integrated Safety Program:

- Updated Safe-by-Design (SBD) Tables for the Cascade, Product, Tails, and Contingency Dump systems in Section 3.7 and associated text of the ISA Summary and SBD Boundary Definition Document – will be completed by 2/17/2010.
- ISA Impact Evaluations, Team Meetings, and resulting LBD changes for Configuration Changes (CCs) and Modifications that are in progress.
- LBD changes for License Amendment Requests (LARS) that are in progress, such as LAR-09-14, Operating While Constructing.

Should you have any questions or comments, please contact Gary Sanford, LES Director of Quality and Regulatory Affairs at 575.394.5407.

Respectfully,



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Chief Operating Officer and Chief Nuclear Officer

cc:

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