An AREVA and Siemens Company

AREVA

January 20, 2010
REL:10:003

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk (03-H8)
One White Flint North
11555 Rockville Pike
Rockville, Maryland 20852-2738

Gentlemen:

Subject: Submittal of Integrated Safety Analysis (ISA) Summary Annual Update for AREVA NP Inc.'s (AREVA NP's) Richland, Washington Fuel Fabrication Facility; License No. SNM-1227; Docket No. 70-1257.

Enclosed with this letter, in CD format, is the annual update of the ISA Summary for AREVA NP's Richland, Washington nuclear fuel fabrication facility. Attachment A provides a listing of the files contained on this CD. AREVA requests that this CD-Rom in its entirety be withheld from public disclosure in accordance with 10 CFR 2.390 in that portions of all files are either commercially proprietary in nature or contain security-related information, respectively. Attachment B provides an affidavit attesting that these files are either proprietary in nature or contain security related information. The annual update is being submitted in accordance with 10 CFR 70.72 (d)(3) and documents the changes to the Richland site's ISA summary. The changes are highlighted in yellow. A list of the files contained on the ISA CD-Rom, including the file name, size, and sensitivity level (commercially proprietary or security-related) for each file, is included as Attachment C to this letter.

Technical contact information relative to the Richland Site ISA is as follows:

AREVA NP Inc.
Attn: Calvin D. Manning, Manager
Nuclear Criticality Safety
2101 Horn Rapids Road
Richland, WA 99354
Phone: 509-375-8237
Email: calvin.manning@areva.com

Additionally, I can be reached at 509-375-8409 or via email at robert.link@areva.com.

Very truly yours,

R. E. Link, Manager
Environmental, Health, Safety & Licensing

c: Rafael Rodrigues, NRC
Mary Thomas, NRC

NMSS01

Attachment A: List of Electronic Files

Attachment B: Affidavit requesting that the AREVA NP ISA summary be handled as proprietary information.

Attachment C: Table of Contents and File Designations

Enclosure: One Computer Disc with the electronic files

ATTACHMENT A

FOLDER: Chapters

Part 1 - Chapters 1 through 8 (One File)
File Name: E15-01 Chapters 1-8 - Version 10.0 - Richland Facility ISA Program.pdf

Chapter 1 - Introduction
Chapter 2 - Horn Rapids Road Site Information
Chapter 3 - Overview of AREVA Facilities, Operations and Hazards
Chapter 4 - ISA Team Credentials and Standard Methodologies
Chapter 5 - Quantitative Standards for Acute Chemical Exposures
Chapter 6 - Definition of Terms
Chapter 7 - General External and Facility Hazards
Chapter 8 - Horn Rapids Plant Administrative and Management Measures

Part 2 - Chapter 9 through 19 (Various Files)

Chapter 9 - UO_2 Building
File Name: E15-01 2.9A - Version 6.0 - UO_2 Building.pdf
Chapter 9 - UO_2 Building
File Name: E15-01 2.9B - Version 6.0 - UO_2 Building.pdf
Chapter 9 - UO_2 Building
File Name: E15-01 2.9C - Version 6.0 - UO_2 Building.pdf
Chapter 9 - UO_2 Building
File Name: E15-01 2.9D - Version 6.0 - UO_2 Building.pdf
Chapter 9 - UO_2 Building
File Name: E15-01 2.9E - Version 6.0 - UO_2 Building.pdf

Chapter 10 - Dry Conversion Facility
File Name: E15-01 2.10 - Version 8.0 - Dry Conversion Facility.pdf

Chapter 11 - SF Building
File Name: E15-01 2.11 - Version 7.0 - SF Building.pdf

Chapter 12 - ELO Building
File Name: E15-01 2.12 - Version 7.0 - ELO Building.pdf

Chapter 13 - UF_6 Cylinder Recertification Facility
File Name: E15-01 2.13 - Version 6.1 - UF_6 Cylinder Recertification Facility.pdf

Chapter 14 - Ammonia Recovery Facility and Industrial Waste Water Treatment System
File Name: E15-01 2.14 - Version 7.0 - ARF and Industrial Waste Water Tr.pdf

Chapter 15 - Blended Dysprosium and Uranium Processing Facility (BDU)
File Name: E15-01 2.15 - Version 6.1 - BDU Proc Fac.pdf

Chapter 16 - Detached Storage and Waste Handling Systems
File Name: E15-01 2.16 - Version 7.0 - Detached Storage and Waste Handl.pdf

Chapter 17 - Fuel Services Building
File Name: E15-01 2.17 - Version 6.1 - Fuel Services Building.pdf

Chapter 18 - Ventilation Systems (Plantwide)
File Name: E15-01 2.18 - Version 7.0 - Ventilation Systems (Plantwide).pdf

Chapter 19 - Product Development Test Facility
File Name: E15-01 2.19 - Version 4.3 - Product Development Test Facility.pdf

STATE OF WASHINGTON)
: ss
COUNTY OF BENTON)

Robert E. Link, being duly sworn on oath, states as follows:

1. I am employed by AREVA NP Inc. (AREVA NP) as Manager, Environmental, Health, Safety and Licensing in Richland, Washington. I am responsible for the overall administration of the safety programs at AREVA NP's Richland, Washington nuclear fuel fabrication facility, including regulatory licensing and permitting. This affidavit is based on my first hand, personal knowledge and is submitted in my capacity as Manager, Environmental, Health, Safety and Licensing.

2. I am familiar with the contents of the "Submittal of Integrated Safety Analysis (ISA) Summary Annual Update for AREVA NP Inc., Richland, Washington Fuel Fabrication Facility" (Annual ISA Summary Update), which provides the annual update to the Richland Site ISA as required by 10CFR70.72(d)(3). This Annual ISA Summary Update has been classified and designated as "Proprietary" by AREVA in accordance with the document control system and policies established by AREVA for the control and protection of proprietary and confidential information.

3. AREVA NP is engaged in the business of designing and manufacturing nuclear fuel assemblies for commercial nuclear reactors. Within the United States, there are two additional firms that design and manufacture nuclear fuel for commercial nuclear reactors and there are several other companies outside of the United States that engage in the same business as AREVA NP. Competition among these companies including AREVA NP is fierce and manufacturing costs of the nuclear fuel are critical to the maintenance of market share and to the growth of market share among utility customers.

4. The Annual ISA Summary Update contains commercial information of a confidential nature that is not available in public sources or available to the public. Sections also contain information that is considered security sensitive in accordance with USNRC RIS 2005-31. This information contained in the Annual ISA Summary Update is commercial and confidential because it:

A. Reveals distinguishing aspects of AREVA NP's manufacturing processes by relating sequences of operations and/or sub-operations to optimize the efficiency and performance of manufacturing operations which a competitor within the field of nuclear fuel manufacturing may adapt for their own processes, reducing the competitor's expenditure of resources to achieve the same efficiencies, thereby gaining a competitive advantage to the disadvantage of AREVA NP.

B. Reveals the use of process chemical additives for the enhancement of chemical processes which are believed to be unique in the industry both in terms of type and application, which if revealed to a competitor would provide for an unfair competitive advantage by reducing any expenditure by the competitor to develop and test the same concepts.

C. Reveals aspects of privately funded development of process controls and parameters derived by AREVA NP over the course of optimizing the performance of waste treatment and other processes.

D. Reveals technical rationale developed by AREVA NP relating to plant layout, structure, process flow and other technical information which a competitor could readily use without expenditure of funds and replicate in its facilities thereby gaining a competitive advantage to the disadvantage of AREVA NP.

5. AREVA NP Inc. will suffer considerable competitive harm if the contents of the license amendment package are made available to AREVA NP domestic and international competitors. Finally, this material cannot be reasonably segregated from other material which may not meet the criteria set forth in 10 CFR § 2.390.

Dated this 26th day of January, 2010.

Robert E. Link
Manager, Environmental, Health, Safety and Licensing

STATE OF WASHINGTON)
: ss
COUNTY OF BENTON)

On this 26th day of January, 2010, before me, the undersigned, a Notary Public in and for the State of Washington, duly commissioned and sworn, personally appeared Robert E. Link to me known to be the Manager, Environmental, Health, Safety and Licensing of AREVA NP Inc., the corporation that executed the foregoing instrument, and acknowledged the said instrument to be the free and voluntary act and deed of said corporation, for the uses and purposes therein mentioned, and on oath stated that he is authorized to execute the said instrument.

Witness my hand and official seal hereto affixed the day and year first above written.

Mary Anne Heilman
Notary Public in and for the State of Washington,
residing at Benton, Washington.
My commission expires: June 9, 2012

Attachment C - Table of Contents (2010)

Sequence Number & File Name	Size in KB	Commercially Proprietary or Security Related
File: 001 E15-01-1 Chapters 1-8 Version 10.pdf	2,069	Yes
File: 002 E15-01-2.9A Version 6.0 - UO2 Building.pdf Includes systems: • System 065 (UF_6 Cylinder Washing) • System 070 (ADU Precipitation and Drying) • System 080 (ADU Uranium Recovery) • System 090 (ADU Powder Production) • System 100 (ADU Process Offgas (POG))	2,400	Yes
File: 003 E15-01-2.9B Version 6.0 - UO2 Building.pdf Includes systems: • System 120 (UNH Reprocessing) • System 130 (Conversion of UO_2 Pellets to U_30_8 Powder) • System 150 (Miscellaneous Uranium Recovery System (MURS)) • System 190 (UO_2 Pellet Dissolution) • System 335 (TNF-XI Inner Powder Filling, Storage, and On Plant Movement) • System 322 (UO_x Powder Download Operation) • System 350 (Powder Drum Warehouse) • System 360 (Lube Blend Press Feed)	3,574	Yes
File: 004 E15-01-2.9C Version 6.0 - UO2 Building.pdf Includes systems: • System 370 (UO_2 Pellet Pressing) • System 380 (UO_2 Pellet Sintering) • System 390 (UO_2 Pellet Grinding and Inspection) • System 400 (UO_2 Pellet Storage) • System 410 (Powder Characterization Facility) • System 420 (Pellet QC Inspection)	692	Yes
File: 005 E15-01-2.9D Version 6.0 - UO2 Building.pdf Includes systems: • System 460 (Rod Loading) • System 470 (Rod Testing) • System 480 (Rod Transport and Storage) • System 490 (Rod Downloading) • System 540 (Bundle Assembly and Storage) • System 550 (Bundle Disassembly) • System 790 (Analytical Laboratories)	1,819	Yes
File: 006 E15-01-2.9E Version 6.0 - UO2 Building.pdf Includes systems: • System 323 (BLEU Receipt and Download) • System 355 (BLEU Powder Storage) • System 325 (BLEU Powder Preparation) • System 365 (BLEU Lube Blend) • System 375 (BLEU Pellet Pressing)	3,946	Yes

Sequence Number & File Name	Size in KB	Commercially Proprietary or Security Related
• System 385 (BLEU Pellet Sintering) • System 395 (BLEU Pellet Grinding/Inspection) • System 135 (BLEU Scrap Recovery) • System 405 (BLEU Pellet Storage)		
File: 007 E15-01-2.10 Ver 8.0 - Dry Conv Facility.pdf	2,508	Yes
File: 008 E15-01-2.11 Ver 7.0 - SF Building.pdf	5,225	Yes
File: 009 E15-01-2.12 Version 7.0 - ELO Building.pdf	2,603	Yes
File: 010 E15-01-2.13 Ver 6.1 - UF6 Cyl Recert.pdf	4,356	Yes
File: 011 E15-01-2.14 Ver 7.0 - ARF and Ind Waste.pdf	1,495	Yes
File: 012 E15-01-2.15 Ver 6.1 - BDU Proc Fac.pdf	169	Yes
File: 013 E15-01-2.16 Ver 7 - Detached Storage.pdf	5,370	Yes
File: 014 E15-01-2.17 Ver 6.1 - Fuel Services Bldg.pdf	703	Yes
File: 015 E15-01-2.18 Ver 7 - Vent Syst Plantwide.pdf	15,205	Yes
File: 016 E15-01-2.19 Ver 4.3 PDTF.pdf	162	Yes