February 24, 2010

Mr. Gary Sanford, Director
Quality and Regulatory Affairs
Louisiana Energy Services, LLC
P.O. Box 1789
Eunice, NM 88231

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION FOR REVIEW OF THE 10 CFR 70.72 SUMMARY OF CHANGES FOR LOUISIANA ENERGY SERVICES

Dear Mr. Sanford:

The staff has completed its review of your Annual Summary of the 10 *Code of Federal Regulations* (10 CFR) 70.72 (c) Evaluations dated February 1, 2010 (Agencywide Document Access and Management System [ADAMS] accession number ML100350169). The correspondence provided a brief summary of changes to the records made without prior U.S. Nuclear Regulatory Commission (NRC) approval, in accordance with to 10 CFR, Section 70.72. As a result of our review, we request that Louisiana Energy Services provide additional information supporting certain facility changes identified in the attachment to this letter (Facility Change Packages). Please provide this information for our review within 30 days from receipt of this letter. Also, notify us within this time period if you believe additional time will be needed to respond to any portion of the information requested in the attachment, together with a proposed schedule for its submittal.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter and its enclosures will be available electronically for public inspection in the NRC Public Document Room or from the NRC document system ADAMS. ADAMS is accessible from the NRC Website at http://www.nrc.gov/reading-rm/adams.html.

If you have any questions regarding this request, please contact Ty Naquin, of my staff, at (301) 492-3187, or via email at Tyrone.Naquin@nrc.gov.

Sincerely,

/RA/

Brian W. Smith, Chief
Uranium Enrichment Branch
Fuel Facility Licensing Directorate
Division of Fuel Cycle Safety
and Safeguards
Office of Nuclear Material Safety
and Safeguards

Enclosure:
Request for Additional Information

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

cc:
William Szymanski/DOE
Gary Don Reagan/Hobbs
Cindy Padilla/NMED
Glen Hackler/Andrews
Gary Schubert/Lea County
Michael Marriotte/NIRS
Jon Goldstein/NMED
Tannis Fox/NMED
Lindsay Lovejoy/NIRS
Alton Dunn/Jal
Daniel Stenger/H&H
Betty Rickman/Tatum
Matt White/Eunice
Richard Ratliff/Texas
CO'Claire/Ohio
Joseph Malherek/PC
Gary King/NMAG
Clint Williamson/LES
Gregory Smith/LES
David Trujillo/Lovington
Reinhard Hinterreither/LES
John Parker/NMED
Lee Cheney/CNIC
Roger Mulder/Texas
Ron Curry/NMED
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DATE	02/18/10	02/17/10	02/18/10	02/24/10

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Request for Additional Information

Facility Change Packages Requested for
Louisiana Energy Services National Enrichment Facility

70.72 Identifier	Description
2008-0493	CC-EG-2008-0486 is an owner acceptance review (OAR) of ECR-2247, SBM Door Schedule and Specification Changes. The documents are Quality Assurance (QA) Level 1 and QA Level 3. Specific changes include: (1) Change specifications to allow for Commercial Grade Dedication of QA-1 doors and hardware, if required. Establish testing and acceptance criteria. (2) Revise door schedule to add new doors, add thermal rating, update door types, change NL security doors (with windows) to flush type, security set type, hardware set, QA Level. Doors w/ removable transoms and B label fire rating changed to 10" high door. (3) Revise door details to add new header details to accommodate change in PSC 2nd floor elevations. (4) Change direction of door swing for security and egress requirements. (5) Correct door dimensions.
2009-0169	This Operations workaround is being implemented because of spurious centrifuge assembly building (CAB) fire alarms that result from various routine fire protection system operations. These alarms cause unnecessary cycling of various organizations and contribute to desensitizing personnel to fire alarms. The following compensatory action to minimize the affect of these spurious alarms has been established: (1) Prior to routine fire protection system operations the following actions will be taken: A. Generate a CAB Fire Alarm System Impairment; B. Place the CAB Fire Alarm in test; C. Notify Security, ETUS, CAB occupants and the Fire Alarm System monitoring company of the potential for a spurious alarm. (2) If an alarm is received during the course of the routine operation, then Operations will investigate to confirm the spurious alarm condition or a fire. (3) On completion of the fire protection system operation restore the system as follows: A. Return the CAB Fire Alarm System to normal; B. Notify security, ETUS, CAB occupants and the Fire Alarm System monitoring company that the system is returned to normal operation; C. Clear the CAB Fire Alarm System Impairment. This workaround has no scheduled repair date.
2009-0397	(CC-RP-2009-0001) This 70.72 (c) Evaluation evaluates an increase of the lower limit of detection (LLD) for effluent sample analyses from 2.5e-15 µCi/mL to 1e-14 µCi/mL. The original LLD was based on Class Y compounds (specifically U3O8) and was not achievable under certain conditions. This proposed changed is based on the justification that Class Y compounds are not applicable to the NEF for gaseous effluent monitoring; and therefore, Class W is the most restrictive class to base LLD. The proposed higher LLD is still significantly below (i.e., 2 orders of magnitude below) the highest allowable LLD of 1e-12 µCi/mL.

2009-0441	This change is the initial submittal of ORM-3600-4. This change establishes the actions for Sole items relied on for safety (IROFS) 16a (administratively limit moderator mass [oil and water] in cylinders containing enriched uranic material to ensure sub criticality by allowing no visible oil and limited cylinder vapor pressure). Included are testing criteria, independent inspection, and actions to be taken in the event of the compromise of Sole IROFS 16a.
2009-0476	(CC-EG-2007-0199) During construction of the TSB heating, ventilation and air conditioning, a lack of fire dampers through fire rated walls was identified that does not meet the required code. The proposed change (ECR-3578) has changed fire ratings of certain walls and doors to one-hour rated thereby eliminating the need for an estimated 10 fire dampers in TSB room 227.
2009-0539	(CC-EG-2009-0348) This 70.72 pertains to the removal of the underground fire water lines that are located just south of the CAB. Terminating and adding retaining plugs to the remaining 6" fire piper which will facilitate the construction of the CAB expansion as shown in attachment 1 of the EG-DCR-2009-103. Reference: DCN-2009-021, EG-DCR-2009-0103.
2009-0552	The proposed activity is summarized as follows: EG-3-3200-01, Nuclear Criticality Safety Evaluations, Rev.2 – this procedure provides instructions for evaluating changes involving or affecting uranium to determine that the entire process will be subcritical (with approved margin for safety) under both normal and credible abnormal conditions. The evaluation is non-calculational and determines whether existing Nuclear Criticality Safety Analyses (NCSAs) bound the issue being evaluated or whether new or revised NCSAs are required. EG-3-3200-02, NCSA, Rev.2 – this procedure performs calculational analyses of individual systems or components and their interactions with other systems or components containing enriched uranium to ensure that criticality safety criteria are met. See procedure revision summary for procedure changes. These procedures remain bounded by 2008-0378.
2009-0553	(CC-_ _- 2009-001) LES ISSP-1.3. Rev. 1.1 is being updated to Rev. 1.2. This is being done to: 1. To provide a more complete security plan for implementation. 2. To integrate updates specifically directed by the U.S. Nuclear Regulatory Commission (NRC). 3. To ensure uniform terminology is used throughout all ISSPs.

2009-0586	CC-EG-2009-0291 is an owner acceptance review (OAR) titled Temporary Location of Weigh Scale in the uranium hexafluoride (UF_6) Area. The affected drawing is LES-1001-C-STL-009-01 Rev.3, which is designated "QA Level 1& 3." This revision of this drawing temporarily locates the cylinder Weigh Scale as well as the Container Support Stillage in the UF_6 area until the CRDB is completed. The designated location for the scale is near Column Line F south of the rail and the stillage is near Column Line E north of the rail. The drawing also reserves a space for a ventilation room near Column Line D south of the rail.
2009-0673	The proposed activity is EG-3-2100-05, Commercial Grade Dedication Process (CGDP), Rev. 3. This procedure establishes responsibilities and methods for the Commercial Grade Dedication process. This process prepares reviews, evaluates, and accepts Commercial Grade Dedication Plans (CGDPs) for items or services not readily available from a supplier with a quality program meeting the Louisiana Energy Services requirements, to ensure they are suitable for the applicable quality assurance level. Generally, this will apply to QA Level 1 or QA Level 1G. The proposed changes are described in the procedure revision summary.
2009-0751	Configuration Change CC-EG-2009-0285 identified one (1) report and seventeen (17) criticality calculations performed by ETC. ETC document ETC4077747 summarizes the results from the other seventeen (17) calculations. Each calculation was tasked to determine the critical and safe parameters for Generic Uranyl Fluoride systems of 5%, 6%, and 7% 235U enrichment. Parameters presented were calculated using the ANSWERS criticality code MONK, version 8A, which has been approved for use by the NRC for criticality calculations. The Nuclear Criticality Safety non-critical Interdisciplinary Review comments are being tracked by CRR-2009-0285-01 through CRR-2009-0285-18

2009-0781	(CC-EG-2009-0408) This Configuration Change (CC) encompasses the design and utilization of the Mobile Feed Sampling Rig that is used to take samples of UF_6 feed cylinders for analysis to ensure that the material meets the proper ASTM specifications and enrichment limits prior to the material being introduced to the cascades. The Mobile Feed Sampling Rig is not currently described in the License Basis Documents. This CC includes the new markups to describe the system and it also includes a new chemical accident sequence that is mitigated by the application of IROFSC21 that was recently approved by the NRC via a safety evaluation report (SER), IN-09-00195-NRC (LAR-09-08) Under this CC the use of IROFSC21 (an orifice spool piece) is applied to the Mobile Feed Sampling Rig to mitigate the consequences of a chemical release as described in the new Accident Sequence UF3-2. The orifice spool piece is detailed in ETC4066112 Rev. 0 is a passive engineered flow restriction device that ensures that the maximum flow rate is less than the flow rate assumption of the consequence analysis. This conclusion is supported by the Feed Sampling Orifice Plate IROFS Calculation, ETC4056082 that is also included in this CC. This flow restriction is being provided to ensure that consequences to the worker for inhalation of HF or uranic material in the event of a postulated release will be mitigated to low. The use of this IROFS (with different orifice opening diameters for different applications) was approved under LAR-09-09 (Assay Sampling Vacuum Pump/Trap Set) and LAR-09-08 (Tails Evacuation Vacuum Pump/Trap Set and Cascade Sampling Rig). The use of the Mixed-Bed Trap was approved in LAR-09-09 and this same trap is used in the Mobile Feed Sampling Rig. This CC also includes the mechanical drawings for the Mobile Cascade Sampling Rig. The use of IROFSC21 in the Mobile Cascade Sampling Rig was approved in the SER for LAR-09-08 listed above.