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LES-10-00106-NRC

Attn: Document Control Desk
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: Fourth Interim 2010 Summary of 10 CFR 70.72(c) Evaluations

Reference: 1) LES-10-00061-NRC, Letter from LES to NRC, Interim 2010 Summary of 10 CFR 70.72(c) Evaluations, dated March 30, 2010.
2) LES-10-00077-NRC, Letter from LES to NRC, Second Interim 2010 Summary of 10 CFR 70.72(c) Evaluations, dated April 22, 2010.
3) LES-10-00092-NRC, Letter from LES to NRC, Third Interim 2010 Summary of 10 CFR 70.72(c) Evaluations, dated May 7, 2010.

Pursuant to the requirements of 10 CFR 70.72(d)(2), Louisiana Energy Services, LLC (LES) herewith provides in the Enclosure the Fourth Interim 2010 Summary of changes to records required by 10 CFR 70.62(a)(2). It should be noted that the changes summarized were made in accordance with the applicable regulations and approved processes.

The submittal is being made to fulfil a request made by NRC Region II to provide a list of changes made by 10 CFR 70.72(c) showing the programmatic areas and the date the changes were approved to support the Operational Readiness Review. If additional changes are required to support receipt of feed material and first cascade on line, LES will provide an additional interim update when requested by the NRC.

The enclosed Interim 2010 Summary 10 of CFR 70.72(c) Evaluations provides a summary of the 10 CFR 70.72(c) evaluations numbered 2010-351 through 2010-386 performed by LES. This submittal also includes a summary of any previously open evaluations that were completed in 2010 subsequent to the submittal of References 1, 2 and 3.

If you have any questions, please contact Gary Sanford, Director of Quality and Regulatory Affairs, at 575.394.5407.

Respectfully,



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Chief Nuclear Officer and Vice President of Operations

Enclosure: Fourth Interim 2010 Summary of 10 CFR 70.72(c) Evaluations

NMS501

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Enclosure

Fourth Interim 2010 Summary of 10 CFR 70.72(c) Evaluations

70.72(c) Identifier	70.72(c) Approval Date	Change Description	License Basis Document(s) Affected	Programs Affected
2010-0207	5/7/2010	The proposed activity is Configuration Change Number CC-EG-2010-0122. This activity implements the new IROFSC22 which will be added to the existing EC3-1 accident sequence supplementing IROFSC6 enrichment control. IROFSC22 is being included to administratively verify U235 enrichment by performance of mass balance activities. This new IROFS will calculate flow and cylinder weight trends. The feed cylinder weight loss, tails cylinder weight increase, and product cylinder weight increase will be determined for the specified enrichment campaign. This data will be used to establish cylinder weight trends that will verify acceptable enrichment. A local readout weight indication will be used to perform this additional monitoring activity for the new IROFSC22. IROFSC22 provides additional assurance that subcriticality within the designed process will be maintained. A failure probability index of (-3) is selected for IROFSC22. This corresponds to an enhanced administrative IROFS for routine planned operation per NUREG-1520. For an uncontrolled sequence, the risk would still be minimized by the high vacuum standard of the plant as well as safe-by-design components utilized in the plant processes and core equipment.	None	Material Control and Accountability
2010-0208	5/15/2010	The proposed activity Configuration Change Number CC-EG-2010-0211. This activity provides for revision to the following Boundary Definition Documents and ORMS to support LAR 10-04 to clarify what is in the IROFS boundary and equipment operated. They are NEF-BD-16a and NEF-BD-38 ORM 3600-4, 3600-8 and 3600-11.	None	Nuclear Criticality Safety
2010-0344	5/1/2010	The proposed activity is Configuration Change Number CC-LS-2010-0017. This activity provides for change in the LES organization. On March 26, 2010, the LES Board of Managers announced the appointment of Gregory OD Smith as President and Chief Executive Officer of URENCO USA, effective May 3, 2010. Mr. Smith will replace Reinhard Hinterreither, who has been appointed to the position of Chief Operating Officer of Enrichment Technologies	None	None

		Corporation (ETC). The Safety Analysis Report (SAR), section 1.2.1.2, will be updated to reflect these appointments. The company address will also be updated in section 1.2.1.1 to reflect the relocation from downtown Eunice NM to the site that is outside of the city limits.		
2010-0348	5/4/2010	<p>The proposed activity involves Revisions to the following Procedures: Revision 4 to Procedure AD-3-1000-05, Safety Review Committee. This procedure provides the methodology to implement the Safety Analysis Report and license requirements regarding technical and administrative review and audit of operations that could impact plant worker, public safety and environmental impacts and describes the organization, responsibilities, and method of operation of the Safety Review Committee (SRC). This procedure revision incorporates a requirement from SAR section 4.2.1 for tracking ALARA related SRC action items via the Corrective Action Program. The procedure was also changed to clarify that other SRC action items are tracked in the SRC minutes.</p> <p>Revision 11 to Procedure CA-3-1000-01, Performance Improvement Program. This procedure establishes the National Enrichment Facility program for the prompt identification, screening, evaluation, reporting, tracking, and resolution of adverse conditions. This procedure satisfies the commitments in the Safety Analysis Report, Appendix A, Quality Assurance Program Description, Section 16, Corrective Actions. This procedure was changed to remove a requirement regarding how SRC action items are tracked because the requirement has been added to AD-3-1 00-0-05 (as discussed above).</p>	None	Corrective Action, Quality Assurance
2010-0351	5/5/2010	The proposed activity Configuration Change Number CC-LS-2010-0019. This activity will update the Fundamental Nuclear Material Control Plan (FNMCP) and Attachment, the Quality Assurance Program Description (QAPD), and the Safety Analysis Report (SAR) to reflect upcoming changes to streamline the organizational structure at URENCO USA. These changes will be processed per LBDCR 10-0060. The position of Chief Operating Office and Chief Nuclear Officer will be eliminated. The duties of Chief Nuclear Officer will be assumed by the Vice President of Operations. The title of the individual fulfilling these	FNMCP, QAPD, SAR	None

		responsibilities will be changed to Vice President of Operations and Chief Nuclear Officer. The proposed change will also replace cross reporting/matrixed responsibilities of the Plant Support Director, Health and Safety Manager, Environmental Compliance Manager, and Quality Assurance Manager from the Chief Operating Officer to the Vice President of Operations and Chief Nuclear Officer.		
2010-0352	5/6/2010	The proposed activity is Revision 3 to Procedure EG-3-2100-09, Identification, Disposition, and Resolution of Nonconforming Items. This procedure establishes the URENCO USA program for the prompt identification, disposition, and resolution of nonconforming items. This procedure also satisfies the commitments in Safety Analysis Report, Appendix A, Quality Assurance Program Description, Section 15, Nonconforming Items. This procedure is to be used for identifying and correcting items identified as non-conformances associated with materials, parts, or components. This procedure establishes the method and responsibilities for the identification of non-conformances, regardless of QA Level of the item involved, to prevent the inadvertent installation or use of nonconforming items during the design, construction, operation, and decommissioning of URENCO USA. This revision deleted a step that required the responsible engineer to give QA an "info only" copy of the NCR that was generated. This was deleted as there is no requirement for this action. All NCRs that are written on QL-1, 1G or 2 items have QA involvement in the evaluation. CR 2009-3492 Action 2 requests deletion of this step. This was also suggested in CR 2009-3905 and audit report 2009-A-10-074. This will satisfy CR 2009-3492. The specifics of the revisions are contained in the revision summary in the procedure.	None	Corrective Action
2010-0353		Open		
2010-0354	5/5/2010	The proposed activity is Work Order WO# 1001 91 013003045. This activity provides for performing work in the SBM, a junction box, electrical wiring and conduit pertaining to a portion of the Criticality Accident Alarm System (CAAS) needs to be moved and re-routed. This movement (of a junction box and the re-routing of its associated conduits "2, 4, 14" identified on drawing CME-SKE-1001 -E-CAAS-101-01) is required to allow installation of concrete ceiling. The	None	Configuration Management

		function and configuration of the CAAS will not be changed. Only the routing of a portion of its electrical supply is affected.		
2010-0355	5/10/2010	The proposed activity is Minor Mod/Wo #3003064. This activity will undertake the relocation of existing Fire Protection Water Suppression System piping to support the CAB (1300) / SBM (1001) Building expansion and the new construction of the SBM 1003 Building. The work involved will consists of: 1. Connect riser located in stairwell No. 8 of SBM I001 to the existing Fire Water Suppression System piping, 2. Connect riser located in the CAB Expansion to the existing Fire Water Suppression System piping and reinstall fire hydrant 15FHY72 removed during the installation of foundation for the CAB Expansion, 3. Relocate Fire Water Suppression System piping and associated fire hydrants 13FHY72 and 14FHY72 north of their present location in preparation of the new construction for the SBM 1003 building and, 4. Install new Fire Water Suppression System piping and five (5) risers in the SBM 1003 Building.	None	Configuration Management
2010-0356	5/7/2010	The proposed activity is the initial issuance of Operating Requirements Manual ORM 3500-1, Safe By Design. This ORM requirement is applicable while enriched uranium is in process or storage. ORM 3500-1 helps to implement Safe By Design requirements. This is an update of the OP-5-3000-01 index.	None	Nuclear Criticality Safety
2010-0357	5/7/2010	The proposed activity is for the revision from Issue 4 to Issue 5 of work Procedure ETUS-WP-020, Leak Testing the Tri-Flange and Top Flange connections. This activity will be implemented by ETUS and takes place in the Separation Building Module 1001 (Cascade mini-Hall 1A) at the National Enrichment Facility (NEF) in Eunice, New Mexico. These changes were made because new Varian helium leak detectors recently replaced previously installed Pfeiffer helium leak detectors on the cascade evacuation and leak test pump sets. There are many textual changes in this revision all of which are to clarify and correct the operation of the new leak testing equipment and to clarify the operators' evaluation of the Helium leak detector readings. These ETC/ETUS leak test activities are conducted before the introduction of UF6 to the cascade so no licensed material is present. These changes have no	None	Testing

		impact on the amount of material at risk within the facility. The changes have no impact on the function or operation of engineered or administrative IROFS applicable to the facility. Prior 70.72 Evaluation 2009-0375.		
2010-0358		Open		
2010-0359	5/12/2010	The proposed activity is Revision 4 to Procedure OP-3-3300-01, Operations Surveillance Procedure. This procedure establishes the requirements for verification of IROFS Operability for 1ROFS36f, 38, 50a,b,c,d,f and h. ' This revision changed OP-3-3300-01-F-1 Required Actions to clarify the requirements for shiftly verification of cylinder fill mass. This clarification ensures that the IROFS requirements are met while not causing undue burden on the Operations crews by forcing unnecessary verifications. OP-3-3300-01-F-3 Required Actions were changed to add a check of water level in the plastic barriers.	None	Surveillance
2010-0360	5/14/2010	The proposed activity is Configuration Change number CC-EG-2010-0132. This activity consist of changing the word "assumed" to "analyzed for determining the affected fire accident identifiers' consequence (FF6-1, FF6-2, FF7-1, FF15-1, FF16-1, FF16-2, FF24-1, FF25-1, FF25-2, FF42-1, FF43-2, and FF44-1) in the ISA Summary (Table 3.7-4). The reason for this change is to update the affected fire event accident identifiers to be consistent with the integrated safety analysis documented in 51-2400553-01-LES (Assessment of Facility Fire Risk at NEF for ISA and Design Basis) and 32-2400503-01-LES Attachment F (ISA Consequence Assessments for Airborne Releases Attachment F: Fire Accident Scenarios). Condition report 2010-0873-CR (tracking CR Based on ISA Team Meeting Minutes ISA-MEM-0026-00) pertains to this change.	ISA Summary	Fire Safety
2010-0361		Open		
2010-0362	5/10/2010	The proposed activity is Revision 1 to Operator Workaround CR 2010-1484. This activity involves several minor changes made to the workaround associated with sequence of actions for Filling, Stop Filling and Drain Procedure associated with the operation of the temporary DI water system. Prior 70.72 Evaluation 2010-0345	None	None

2010-0363	5/10/2010	The proposed activity is Revision 3 to Procedure SA-3-1000-03, General Safety. This procedure provides information, requirements and instructions for establishing and maintaining safe working conditions and safe work practices in URENCO USA structure, systems components and areas turned over and under the direct control of LES and associated offsite facilities. This revision added new Steps 4.2 and 5.1.6 regarding department safety meetings. This was added to create a management expectation to conduct department safety meetings. Attachment 2, Step 4.1.2, added "as soon as possible, and no later than by the end of shift" and removed notification of Operations Center. This was added to place a time limit for reporting injuries or illnesses. The Operations Center/Control Room is only notified of emergencies. The specifics of the revisions are contained in the revision summary in the procedure.	None	Industrial Safety
2010-0364	5/10/2010	The proposed activity is Revision 1 to Procedure LO-3-2000-05, Weighing of UF6 Cylinders. This procedure provides instructions for weighing UF6 cylinders and control standards using the WÖHWA Type 1 and Type 2 Cylinder Weighing Systems. The procedure was rewritten to match the changes in the current Fundamental Nuclear Control Plan, Rev. 10.1, specifically to remove the requirement to turn the cylinders 180 degrees and reweigh them for final measurements. The procedure applies to production weighing of 308 and 48Y cylinders and weighing artefact control standards. The procedure does not apply to the weighings performed for certification of artefact standards or qualification of the scale for Material Control and Accountability (MC&A) purposes.	None	Material Control and Accountability
2010-0365	5/11/2010	The proposed activity is Revision 3 to Procedure EP-3-0300-04, Emergency Preparedness Inventory Control. The purpose of this procedure is to describe how emergency equipment is tracked and controlled. This revision changed frequency from monthly to quarterly on all forms. To match the requirements of the Emergency Plan. Added Motorola charger. To accurately reflect equipment needing to be inventoried on Form 1. Updated list of equipment being inventoried. To accurately reflect equipment needing to be inventoried on Forms 4 and 5. Revised Form 7 to specify location being covered and updated equipment requirements. To accurately reflect equipment needing to	None	Emergency Planning

		be inventoried. Added Forms 8 - 15 to cover inventory of additional emergency caches. To ensure all emergency equipment is inventoried. Revised Form 16 to remove equipment no longer maintained in this location. To accurately reflect equipment needing to be inventoried. The specifics of the revisions are contained in the revision summary in the procedure.		
2010-0366	5/11/2010	The proposed activity is the issuance of (new) of Procedure OP-3-0590-02, Fire Detection System. This procedure standardizes operation of the installed fire detection equipment and therefore reduces response times and allows for proper training of operations and Fire Brigade Personnel.	None	Fire Protection
2010-0367	5/11/2010	The proposed activity is Revision 5 to Procedure OP-3-0660-01, Gaseous Effluent Ventilation System. This revision changes the position of some valves found in Attachment 1 of this procedure. This change is due to flow balancing of the Gaseous Effluent Ventilation System following initial startup.	None	None
2010-0368		Open		
2010-0369		Open		
2010-0370	5/11/2010	The proposed activity is revision of ETUS-WP-046 from Issue 2 to Issue 3, Inspection of Completed Cascades. This activity is implemented by ETUS and will occur in the Cascade Halls (Separations Building Modules) at the National Enrichment Facility (NEF) in Eunice, New Mexico. This revision clarifies operator technique to carefully inspect that all the M8 tri-flange bolts have been tightened. There are no changes beyond the scope of the first issue of the procedure or the previous 70.72(c) review. Prior 70.72 Evaluation 2010-0244.	None	Quality Control
2010-0371, Rev. 1	5/19/2010	The proposed activity is Revision 5 to Procedure OP-3-0700-01, General Electrical Operation. This procedure provides instruction for operation of the National Enrichment Facility general electrical components. This revision allows for proper operation of the electric plant. The specifics of the revisions are contained in the revision summary in the procedure. The 70.72(c) is being revised due to the previous revision inappropriately checking 'YES' to Section III of Part I. Prior 70.72 Evaluation 2010-0371 Rev. 0.	None	None
2010-0372 Rev. 1	5/19/2010	The proposed activity is Revision 5 to Procedure OP-3-2000-01, Hazardous Release Response. This procedure provides for identification of entry conditions and actions to be taken in the event of a release of hazardous	None	None

		materials. This revision clarifies actions to be taken in the event of a hazardous release response situation. The specifics of the revisions are contained in the revision summary in the procedure. The 70.72(c) is being revised due to the previous revision inappropriately checking 'YES' to Section III of Part I. Prior 70.72 Evaluation 2010-0372 Rev. 0.		
2010-0373	5/13/2010	The proposed change is Revision 6 to Procedure EG-3-3100-03, Quality Assurance Level Assignments. This procedure provides direction on assigning Quality Assurance Levels for structures, systems and components and activities at URENCO USA. This revision changed Note 2 in Attachment 1 regarding the quality level of the expansion anchors used in structures that are either IROFS27e related or are in the "Other" Category.	None	Quality Assurance
2010-0374	5/13/2010	The proposed activity is Revision 3 to Procedure LO-3-2000-04, Container Handling During Initial Plant Start-Up. This procedure provides instructions for receipt and shipment of UF6 cylinders prior to completion of shipping/receiving facilities in the Cylinder Receipt and Dispatch Building (CRDB). This revision added guidance on documenting Non-Destructive Assay results if a vendor is used to perform the analysis on incoming UF6 full feed cylinders to Form 1. Added guidance to fill out and attach "DO NOT USE" tags to cylinders before being placed in a storage location. The specifics of the revisions are contained in the revision summary in the procedure.	None	None
2010-0375	5/14/2010	The proposed activity is Revision 3 to Procedure OP-3-0450-01, Cascade System. This procedure provides detail for cascade system operation. This revision to Attachment 8 and Form 4 to implements IROFSC22 by providing for the performance of a mass balance to verify that criticality limits are not exceeded in the enrichment process. The verification is performed each shift by recording UF6 weights from the Feed, Feed Purification, and Product systems, then comparing them to the previous shift's data to calculate feed and product flow rates. These rates are plotted on a graph that shows the possible flow rates for a 6% enrichment condition in that assay unit. If the plotted point is in the correct region on the graph, then criticality limits are not violated.	None	Nuclear Criticality Safety
2010-0376		Open		
2010-0377	5/14/2010	The proposed activity is Revision 5 of Procedure MC-3-3000-01, Measurement	None	Material Control

		Control. This procedure defines the minimum requirements for the measurement control program for measurements performed in support of URENCO USA nuclear material control and accountability (MC&A) program. This revision added "Active Cylinder" in the definitions section to identify that a 30B or 48Y cylinder that is installed in a Solid Feed Station or a Low Temperature Takeoff Station and connected to the process piping via the flexible connection is considered active. The Cylinder does not have to be ONLINE, only connected. Also added Material Balance Period and other editorial changes to resolve CR 2010-657, Action #14. Integrated a reference to the application of a buoyancy correction for initial qualification of control standards in Attachment 3 to resolve CR 2010-718, Action #1. Added a reference to Procedure MC-3-3000-07, Calculations of Mass Corrections, for instructions on the performance of the buoyancy correction for CR 2010-718, Action #1. Revised Attachment 12 to reflect the details of the HPGe detector Non-Destructive Assay system used to measure uranium in in-service chemical traps and solid waste packaged in USDOT approved waste containers to resolve CR 2010-439, Action #2. Removed Step 4.5.3 that stated the Shift Operations Manager supervises operations in the enrichment plant and centrifuge test facility, because the responsibility is not specific to the measurement control program. These details have no impact on the ISA Assumptions, accident sequences, or IROFS.		and Accountability
2010-0378	5/14/2010	The proposed activity is Revision 4 to Procedure MC-3-5000-01, MC&A Physical Inventory Process. This procedure provides directions for performing bi-monthly and annual physical inventories of source material (SM) and special nuclear material (SNM) at URENCO USA and comparing the physical inventory results to the book inventory in support of nuclear material control and accounting (MC&A) as described in the Fundamental Nuclear Material Control Plan (FNMCP). This revision revised the definition of Item Control Area (ICA) to include ICA 3, the Ventilated Storage Area and included instructions in the main body of the procedure to incorporate this area during the annual inventory and completion of the annual inventory forms for CR 2010-657. Added definitions for LEID,	None	Material Control and Accountability

		<p>LEID Limit, and SEID Limit in Section 3. Revised/corrected Step 5.8.7 to also Calculate/determine the SEID Limit, the LEID, and LEID Limit. Revised Section 5.8.1 1 to differentiate the ID Limit term and the ID Limit threshold levels. Revise Section 6.1 for clarification of records that may be generated in the course of performing an annual inventory for CR 2010-657. Replaced MC-4-1000-01 with MC-4-2000-01 the desktop guide for conversion of mass of UF6 to mass of uranium has been revised and was assigned a "2000" designation under CR-2010-657 Action #7. Inserted 'obtain Authorized Derivative Classifier review' Step in Physical Inventory Checklist Form F-1 for CR 201 0-657, Action #7. Deleted Step 5.3.6 and sub-steps b. and c. of step 5.4.4 as the determination was made that Tamper Indicating Devices (TIDs) were not required on processing chests for CR 2010-657, Action #7. Integrated use of buoyancy correction on inventory entries in Attachments 1 and 2. Added a reference to Procedure MC-3-3000-07 to Step 8.1 in the User References section for CR 201 0-71 8, Action #1. The specifics of the revisions related to editorial changes are contained in the revision summary in the procedure.</p>		
2010-0379	5/14/2010	<p>The proposed activity is Revision 4 to Procedure MC-3-7000-01, MC&A Requirements for UF6 Receipts and Shipments. This procedure provides the material control and accounting (MC&A) requirements for receiving nuclear material in the form of uranium hexafluoride (UF6) at URENCO USA and shipping UF6 from URENCO USA. This revision added the term "UF6" to the title of the procedure for clarification. (CR-2010-657). The term "Standard Error" was added to the definitions because it is used for the determination of combined standard error. Changed or deleted notes in Section 5.1, which are regulatory requirements, to steps in this procedure or referenced to another MC&A procedure. Replaced all instances referencing LO-3-2000-01, Receipt and Shipment of Cylinders, with LO-3-2000-04, Container Handling During Initial Start Up as a resolution to an independent review comment form submitted by Logistics. Added a third bullet to the NOTE that precedes Section 5 to identify the Logistics procedure used for the receipt of sample cylinders and verification of the contents. Removed steps that described the use of buoyancy corrections on inventory entries because entries are not</p>	None	Material Control and Accountability

		performed under this procedure. CR 2010-71 8. The specifics of the revisions related to editorial changes are contained in the revision summary in the procedure.		
2010-0380	5/14/2010	The proposed activity is Revision 3 to Procedure PR-3-3000-02, Packaging, Handling, Shipping, and Storage Requirements. This procedure establishes the methods and responsibilities, as well as the minimum requirements for storage URENCO USA materials, parts and components. The controls are intended to prevent damage, deterioration, and/or loss during the warehousing and storage of QA Level 1, 2, or 3 items, and to assure that the items remain in acceptable condition for installation or use. This revision was global in nature and revised the procedure to clarify requirements for storage areas and clarify that the procedure is applicable to non-warehouse areas as well. To ensure there is adequate guidance on in-field storage areas (CR 2009-1615). Removed verbiage to clearly identify the License Basis Document section that is applicable to this procedure. Revised the inspection form (Form 1), to clarify inspection criteria for storage areas/locations. The specifics of the revisions related to editorial changes are contained in the revision summary in the procedure.	None	Quality Assurance
2010-0381		Open		
2010-0382	5/17/2010	The proposed activity is Revision 5 to Procedure OP-3-420-01, Product Change. This revision is to revise Attachment 1 and add Attachment 11. This revision implements IROFS16a without using the Plant Control System (PCS). IROFS16a requires that vapor pressure in a new or cleaned product cylinder be measured prior to introducing UF6. The previous method obtained vapor pressure measurements via the PCS. The procedure change provides a means to measure the required vapor pressure directly and locally, i.e., without a signal that has been transmitted through the PCS.	None	Nuclear Criticality Safety
2010-0383		Open		
2010-0384		Open		
2010-0385		Open		
2010-0386		Open		