

MAY 23 2010

LES-10-00104-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 Number: 70-3103

Subject: Reply to Notice of Violation 70-3103/2010-006-Part 2-Supplement

Reference: 1) Letter from Deborah A. Seymour (NRC) to Gregory Smith (LES), NRC Inspection Report No. 70-3103/2010-006 and Notice of Violation, dated May 3, 2010.
2) Letter from LES to NRC, LES-10-00095-NRC, Reply to Notice of Violation 70-3103/2010-006 Part 2, dated May 12, 2010.

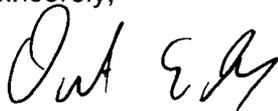
In the response to the 70-3103/2010-006 Notice of Violation (NOV) (Ref. 1), URENCO USA (UUSA) submitted Ref. 2 for Violations A and B, which was related to nuclear criticality safety issues. In the Ref. 2 submittal UUSA contested Violation B. UUSA makes the following formal commitment related to the Violations:

URENCO USA Commitment: URENCO USA commits to not make any changes under its approval authority causing a reduction in the currently established margin of subcriticality, as stated in Chapter 5 of the Safety Analysis Report, until such time that the Violations A and B from inspection report 70-3103/2010-006 are resolved. Upon disposition of the disputed violation this commitment shall expire, or be revised.

URENCO USA was cited for not following an approval process, 10 CFR 70.72(c)(4), for making changes to Chapter 5 of the Safety Analysis Report (SAR). UUSA has reviewed all prior changes to Chapter 5 of the SAR since license issuance and has not found any changes that have resulted in a reduction in the approved margin of subcriticality safety beyond the examples identified in the NRC violations. Violation B addresses NRC concerns for changes that may affect the approved margin of subcriticality for safety without prior NRC approval. The violation does not identify an actual loss of assurance that nuclear processes are subcritical under normal and credible upset conditions.

UUSA is committed to resolving the Notice of Violation and documenting the approved margin of subcriticality in the URENCO USA Licensing Basis Documents to ensure this issue does not reoccur. Should there be any questions regarding this submittal, please contact Gary Sanford, Director of Quality and Regulatory Affairs, at 505.394.5407.

Sincerely,



David E. Sexton
Chief Nuclear Officer and Vice President of Operation

JE07

cc:

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