

December 14, 2010

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

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION FOR INTERIM LICENSE BASIS
DOCUMENTS (TAC NO. L33014)

Dear Mr. Sanford:

We have reviewed the interim license basis documents update transmitted by letter dated July 26, 2010, and additional information is needed in the review of this change. We are enclosing a Request for Additional Information and request that you provide a response within 30 days of this letter.

If you have any questions, please contact Ty Naquin of my staff at 301-492-3187, or via e-mail at Tyrone.Naquin@nrc.gov.

Sincerely,

/RA/

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

Enclosure: As stated

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

cc: William Szymanski/DOE
Gary Don Reagan/Hobbs
Cindy Padilla/NMED
Clint Williamson/LES
Michael Marriotte/NIRS
Jon Goldstein/NMED
Tannis Fox/NMED
Lindsay Lovejoy/NIRS

Cheryl Chance/Jal
Daniel Stenger/H&H
Betty Rickman/Tatum
Matt White/Eunice
CO'Claire/Ohio
Joseph Malherek/PC
Gary King/NMAG
David Sexton/LES

Gregory Smith/LES
Dixie Drummond/Lovington
Glen Hackler/Andrews
John Parker/NMED
Roger Mulder/Texas
Ron Curry/NMED
Glen Smith/NMAG

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

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION FOR INTERIM LICENSE BASIS DOCUMENTS
(TAC NO. L33014)

Dear Mr. Sanford:

We have reviewed the interim license basis documents update transmitted by letter dated July 26, 2010, and additional information is needed in the review of this change. We are enclosing a Request for Additional Information and request that you provide a response within 30 days of this letter.

If you have any questions, please contact Ty Naquin of my staff at 301-492-3187, or via e-mail at Tyrone.Naquin@nrc.gov.

Sincerely,

/RA/

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

Enclosure: As stated

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

| | | |
|---------------------------|---------------------|--------------------------|
| cc: William Szymanski/DOE | Cheryl Chance/Jal | Gregory Smith/LES |
| Gary Don Reagan/Hobbs | Daniel Stenger/H&H | Dixie Drummond/Lovington |
| Cindy Padilla/NMED | Betty Rickman/Tatum | Glen Hackler/Andrews |
| Clint Williamson/LES | Matt White/Eunice | John Parker/NMED |
| Michael Marriotte/NIRS | C. O'Claire/Ohio | Roger Mulder/Texas |
| Jon Goldstein/NMED | Joseph Malherek/PC | Ron Curry/NMED |
| Tannis Fox/NMED | Gary King/NMAG | Glen Smith/NMAG |
| Lindsay Lovejoy/NIRS | David Sexton/LES | |

DISTRIBUTION:
UEB r/f

ML102780101

| OFFICE | UEB | UEB | MODB | MODB | UEB | FFLD |
|--------|----------|----------|----------|-----------|----------|----------|
| NAME | TNaquin | W Moore | CRoman | LCampbell | RWescott | BSmith |
| DATE | 10/05/10 | 10/05/10 | 10/07/10 | 10/07/10 | 10/19/10 | 12/14/10 |

OFFICIAL RECORD COPY

Request for Additional Information
Review of Interim License Basis Documents
Dated July 26, 2010, Docket 70-3103

Provide your evaluation of the consequences to the facility worker for the uncontrolled or unmitigated scenario (without implementation of items relied on for safety [IROFS]). Demonstrate that your analysis is conservative and accounts for uncertainty.

Section 6.3.2.1.1 of the Safety Analysis Report, "Worker Exposure Assumptions", describes all the assumptions used to demonstrate that a facility worker would not receive any significant exposure after a release near his/her vicinity. All the assumptions relied on a worker action immediately after a release has occurred (IROFS39c). The current analysis does not factor in the time that the worker takes to realize that a release has occurred. Dermal exposure or other external factors that could affect the availability of IROFS 39c were not considered in the analysis.

NUREG-1520 Chapter 3, "Integrated Safety Analysis (ISA) and ISA Summary", states that the primary purpose of process hazard analysis is to identify all uncontrolled and unmitigated accident sequences. To establish the chemical consequence severity categories (e.g. high, intermediate, low), no IROFS can be credited in the analysis. Also Appendix 3B of NUREG-1520 Rev 01, states that the applicant needs to demonstrate that there is a dependable amount of conservatism in ISA methods that offsets the uncertainty arising from lack of rigor.

Enclosure