April 1, 2011

Mr. Wyatt Padgett
Licensing Manager
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 January 31, 2011 (Agencywide Document Access and Management System [ADAMS] accession number ML110530477). The correspondence provided a brief summary of changes to the records made without prior U.S. Nuclear Regulatory Commission (NRC) approval, in accordance with 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
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
Gregory Smith/LES
David Trujillo/Lovington
Clint Williamson/LES
John Parker/NMED
Lee Cheney/CNIC
Roger Mulder/Texas
Ron Curry/NMED
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DATE	03/08/11	03/09 /11	04/01/11

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Request for Additional Information

Facility Change Packages Requested for
Louisiana Energy Services National Enrichment Facility

70.72 Identifier	Description
2010-0423	The proposed activity is Revision 6 to Procedure OP-3-2000-02, Fire Response. This procedure provides actions to take for fire or smoke within the facility or range fire approaching the facility. The revision includes the additional direction in Section 3.2 to sound the CAAS fire alarm to warn personnel in minihalls of evacuations as there are not site PA systems speakers in the minihalls. The specifics of the revisions are contained in the revision summary in the procedure.
2010-0460	The proposed activity is Revision 7 to Procedure OP-3-0694-01, Fire Water System Operation. This procedure provides instruction for the maintenance and operation of the Fire Water System. This revision is to remove directions to contact Siemens when performing routine evolutions and maintenance that would actuate fire alarms being monitored by Siemens. As Operations personnel now monitor the fire alarm system in the Control Room, Siemens' monitoring service is no longer needed. The specifics of the revisions are contained in the revision summary in the procedure.
2010-0479	The proposed activity is Revisions 7, 7, 6, 6, 4, 3, and 1 respectively to Procedures OP-3-2000-01, Hazardous Release Response; OP-3-2000-02, Fire Response; OP-3-2000-04, Earthquake Response; OP-3-2000-06, Severe Weather; OP-3-2000-07, Flooding; OP-3-2000-08, Winter Storm Warning; and OP-3-2000-12, Airborne Threat are abnormal operating procedures. They are being revised to reflect a change in the method of instructing employees to take precautions during certain events. They are also being revised to remove directions to have Safety communicate with URENCO USA personnel as that responsibility has been transferred to Operations. The specifics of the revisions are contained in the revision summary in the procedures

2010-0597	The proposed activity is a Revision 7 to Boundary Definition Document (BDD) NEF-BD-39a, Limit Exposure by Requiring Evacuation of Area on Seismic Event. This BDD provides actions to administratively limit exposure by requiring worker action to evacuate the area(s) of concern to ensure worker consequences of inhalation of uranic material and HF are low (ISA Summary Table 3.8-1) provides for administratively limiting personnel exposure by requiring worker action to evacuate the area(s) of concern to ensure worker consequences of inhalation of uranic material and HF are low (see ISA Summary Table 3.8-1). This revision is to resolve the open item regarding the definition of the area of concern for the UBC pad.
2010-0650	The proposed activity is Revision 6 to Boundary Definition Document (BDD) NEF-BD-39c, Limit Exposure by Requiring Evacuation of Area on Release Event. This BDD administratively limits exposure by requiring worker action to evacuate the area(s) of concern to ensure worker consequences of inhalation of uranic material and HF is low. This revision expanded the area that requires training prior to a worker being allowed unescorted access and to correct the title of that training.
2010-0525	The proposed activity is Revision 10 to ETUS-WP-019. The revision includes: Warnings to ensure the test rig is prepared specifically for the TC12 in Step 10; Correction of the control of the thermal enclosure cooling system set point value in Step 11.8.9; Clarification of the adjustment of the Baratron pressure transducers in Step 11.9; Implementation of a Nuclear Criticality Safety Mass Log by the designated Nuclear Material Custodian in Step 13.6.2; Clarification of the methods of Bi-monthly inventory in step 13.6.4; and adding the Nuclear Criticality Safety Evaluation EG-3-3200-01 - F-1 and NCS-CSE-007. Prior 70.72 Evaluation 2008-0442.
2010-0614	The proposed activity is Revision 3 to Procedure EG-3-320-001. Nuclear Criticality Safety Evaluations. This revision was to address condition reports 201 0-667, 201 0-694,2010-1702, and 201 0-1 758 and improvements for ease of use of the procedure. A change from the cross disciplinary review of the procedure was made after revision 0 of the 70.72 was signed. Revision 1 does not change the 70.72, but was resigned to incorporate the change made.
2010-0497	The proposed activity is Configuration Change Number CC-EG-1020-0221. This activity adds the Helium Leak Test Cart to the ISA Summary Section 3.4 (Process Descriptions) similar to the other mobile rigs used to support operations. The change includes the purpose, use, a functional description of the Helium Leak Test Cart, the processes systems interfaced with the Helium Leak Test Cart and address Criticality Safety. The Helium Leak Test Cart is used after the process system (feed, tails, product, blending and sampling, etc.,) area to be tested has had its UF_6, holdup removed. No new accidents were identified. There are no Items Relied On For Safety (IROFS) associated with the Helium Leak Test Cart.

2010-0368	The proposed activity is Configuration Change Number CC-EG-2010-0122, Rev. 2. This activity provides more descriptive information for the new IROFSC22 (EC3-1) change in Revision 1 and includes the Operations Requirements Manual (ORM) and Boundary Definition Document (BDD), Rev. 0, for IROFSC22. The mass balance (IROFSC22) can be used for detecting changes from planned enrichment. The number of running cascades and the campaign assays that have been set have unique product and tails flows due to the mass balance. This point can be plotted on a chart alongside a set of points that model one cascade running at product assay 6% over a range of tails assays. The IROFSC22 function, scope, or activity has not been changed in this revision. There are no license page changes associated with this Rev. 2 package. Prior 70.72 Evaluation 201 0-0207.
2010-0608	The proposed activity is a Revision 8 to Boundary Definition Document (BDD) NEF-BD-39b, Limit Exposure by Requiring Evacuation of Area on Fire Event. This BDD administratively limits exposure to personnel by requiring worker action to evacuate the area(s) of concern to ensure worker consequences of inhalation of uranic material and HF is low. This revision will revise the definition of the area of concern for the UBC Storage Pad as applicable to IROFS39b. It also adds a table of contents and updates references.
2010-0433	The proposed activity is Configuration Change Number CC-EG-2009-0341. This activity is for IROFS37 which is an automatic hardwired, fail-safe, trip of the Ventilated Room HVAC and isolation from the GEVS on smoke detection and limited Ventilated Room design leakage to ensure offsite exposure from building out flow maintains consequences to the public low. LES Calculation CALC-S-00095 shows that a release of the entire assumed Material at Risk (MAR) for the accident sequence (50 kg) would result in low consequences to the public based on 10 CFR 70.61 performance requirements. Therefore, associated IROFS37 can be eliminated from the ISA Summary. CALC-S-00095 is for the SBM and IROFS37 is for the CRDB Ventilated Room. However, the calculation determination of a release of < 600 kg as low consequence to the public bounds the assumed CRDB release of 50kg as described in accident sequence FF25-2.
2010-0586	The proposed activity is Revision 3 to TQ-3-050042, ISA Team Training and Qualification. This procedure provides the guidance for qualification of personnel as Integrated Safety Analysis (1%) Team Members to perform, maintain or update the integrated safety analysis of UUSA hazards, IROFS, or accident sequences, likelihoods, or consequences. This revision added guidance to identify/clarify personnel that are able to be qualified as ISA Team Members based on their positions, training, and experience. Clarified that members qualified under previous revisions of this procedure do not have to be requalified. The specifics of the revisions are contained in the revision summary in the procedure.

2010-0500	The proposed activity is Revision 3 to Configuration Change Number CC-EG-2009-0012. This activity is associated with the approval and implementation of CC-LS-2010-0007, Modify Receptor Definitions in NEF Consequence Methodology, the "local worker" receptor has been combined with "area worker" and been replaced with a new "facility worker" receptor for URENCO USA consequence methodology. A facility worker is now the only worker receptor. This revision, through CALC-S-00116, demonstrates that the uncontrolled consequences to the facility worker for this new accident sequence are low; therefore, no controls (IROFS) are required to meet the performance requirements of 10 CFR 70.61.
2010-0517	The proposed activity is Configuration Change Number CC-EG-2010-0279. This activity is for Accident Identifier: OC2-1 (External Construction) to add the following sentence to thefirst paragraph of the Accident Sequence: "For the SBM1001, an external construction site preparation vehicle is defined as a vehicle that will impart 408,000 pounds force or more to the SBM1001 wall at the vehicle's maximum weight and speed."
2010-0526	The proposed activity is issuance of new document ETUS-WP-047, Hot Acceptance Test TC21 Centrifuge Test Facility NEF. The centrifuge test facility [CTF] within building 1300 at the NEF is being modified to accommodate the performance testing of TC21 gas centrifuges in addition to its original design for TC12 gas centrifuges through CC-EG-2010-0143 with 70.72(c) review 2010-0659. ETUS-WP-47 was drafted from, and relied heavily on, the existing TC12 gas centrifuge hot acceptance testing procedure ETUS-WP-018 i10. These two documents are each 119 pages long and almost identical accept for the specific process parameters unique to each type of gas centrifuge. The same HAT Rig is used to test both types of gas centrifuges with almost exactly the same operating methods. Generally, the only differences are gas pressures and flow rates in the rig and the machines during testing; even these are similarly of the same order of magnitude. All the safety and material accountability measures that were well established for the TC12 gas centrifuge HAT activities are incorporated into the TC21 gas centrifuge HAT activities.