

SEP 30 2011

LES-11-00138-NRC

Office of Nuclear Material Safety and Safeguards
U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555-0001

Louisiana Energy Services, LLC
NRC Docket No. 70-3103

Subject: Submittal of Supplemental Information for LAR-11-02 on Conservatism in Establishment of IROFSC23

References: LES-11-00129-NRC, Submittal of License Amendment Request for Replacement of IROFS41 and Changes to IROFS27e (LAR-11-02), September 19, 2011.

Louisiana Energy Services, LLC (dba "UUSA") hereby submits the attached supplemental information for the above referenced License Amendment Request (LAR-11-02) that was submitted to the NRC on September 19, 2011. This supplemental information is being provided to aid in the NRC's review of this LAR and in response to discussions between NRC Staff and UUSA representatives during a meeting on September 14th, at NRC Headquarters in Rockville, MD.

Enclosure 1 provides an affidavit whereby UUSA considers the information provided in Enclosure 2 as SENSITIVE UNCLASSIFIED NON-SAFEGUARDS INFORMATION (SUNSI), and requests that the information be withheld from public disclosure in accordance with 10 CFR 2.390 as described in RIS 2005-31, Attachment 2, Appendix 1.

Enclosure 2 provides a discussion of conservatism applied in the methodology, testing, and calculations used to support the establishment of IROFSC23. Enclosure 2 also contains SUNSI, marked as "Security-Related Information – Withhold Under 10 CFR 2.390," and should be protected accordingly.

UUSA appreciates the efforts of the NRC staff in supporting the review of LAR-11-02 and the supplemental information contained herein.

If you have any questions regarding this letter, please contact Perry Robinson, VP Regulatory Affairs & General Counsel, at 575-394-6598.

Respectfully,



David Sexton
Chief Nuclear Officer and Vice President of Operations

Enclosures:

- 1) Affidavit
- 2) Conservatism in IROFSC23 Implementation

NMS501

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ENCLOSURE 1

Affidavit

I, David Sexton, being duly sworn, state that I am the Chief Nuclear Officer for Louisiana Energy Services, L.L.C. ("LES"); that I am authorized on the part of said company to sign and file with the Nuclear Regulatory Commission ("NRC") this document; and that all statements made and matters set forth herein are true and correct to the best of my knowledge, information, and belief.

I am making this affidavit in conformance with the provisions of 10 CFR 2.390 for the regulations of the NRC, and in conjunction with LES' request for withholding, which is accompanied by this affidavit.

The information for which exemption from public disclosure is requested contains SENSITIVE UNCLASSIFIED NON-SAFEGUARDS INFORMATION (SUNSI) related to descriptions of facilities where licensed material is located and accident analyses for the UUSA Facility. LES requests the following information be exempt from disclosure pursuant to the provisions in NMSS Guidance, Screening Criteria for Security-Related Sensitive Unclassified Non-Safeguards Information, RIS 2005-31, Attachment 2, Appendix 1 (Fuel Cycle Facility Reviews):

LES Letter # LES-11-00138, Enclosure 2

Pursuant to the provisions of 10 CFR 2.390(b)(4), the following is furnished for consideration by the NRC in determining whether the security-related information sought to be protected should be withheld from public disclosure.

1. For the sensitive unclassified security-related information (SUNSI), the information was identified by LES using the guidance from NRC RIS-2005-31, Attachment 2, Appendix 1 (Fuel Cycle Facility Reviews).
2. The information sought to be withheld is being provided to the NRC in confidence, and, under the provisions of 10 CFR 2.390, is to be received in confidence by the NRC.
3. The information sought to be withheld is not available in public sources, to the best of LES' knowledge and belief.

For the all the reasons discussed above, LES requests that the identified SUNSI be withheld from public disclosure.

David Sexton

 David Sexton
 Chief Nuclear Officer (CNO) and
 Vice President of Operations
 Louisiana Energy Services, LLC

The foregoing document was acknowledged and sworn to before me on this 30 day of September 2011 by David Sexton, who personally appeared before me.

Mary Lou Gonzalez

 Notary Public
 My commission expires: 4/20/2015

Seal

