

NOV 22 2011

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LES-11-00164-NRC

Attn: Document Control Desk  
Office of Nuclear Safety and Safeguards  
U.S. Nuclear Regulatory Commission  
11555 Rockville Pike  
Rockville, MD 20852

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

Subject: Response to Request for Supplemental Information on Request for  
Exception to License Condition 10.f of Materials License SNM-2010

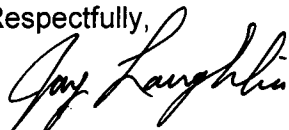
Reference: 1. Letter from B. Smith to Z. Rad (LES), Acceptance Review,  
Request for Exception to License Condition 10.f of Materials License  
SNM-2010 – Supplemental Information Needed (Second Request),  
dated November 9, 2011  
2. LES-11-00141-NRC, Revised Request for Exception to License  
Condition 10.f of Materials License SNM-2010, dated October 14,  
2011  
3. Telecommunication between LES and the NRC Staff concerning the  
Ref. 1 Letter, on November 10, 2011.

As follow-up to the Ref. 1 letter pertaining to the NRC's Acceptance Review of the Ref. 2 request, Louisiana Energy Services, LLC (dba "UUSA") herewith provides the response in Enclosure 1. It should be noted that this submittal represents UUSA's complete response to the Ref. 2 request, as opposed to the staged (two-part) response which UUSA proposed at the time of the Ref. 3 telecommunication.

Some of the documents in Enclosure 1 contain either company business proprietary data or else personal information, both of which should be withheld from the public in accordance with 10 CFR 2.390. An affidavit identifying the specific documents to be withheld is provided as Enclosure 2.

Should there be any questions regarding this submittal, please contact Zackary Rad, Licensing Manager, at 575.394.6689.

Respectfully,



Jay Laughlin  
Chief Nuclear Officer and Head of Technical Services

Enclosures: 1. Response to NRC RSI on Request for Exception to License Condition  
10.f of Materials License SNM-2010  
2. Affidavit

AMSS01

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LES-11-00164-NRC

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## ENCLOSURE 1

### Response to NRC RSI on Request for Exception to License Condition 10.f of Materials License SNM-2010

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## Attachment 1

### Summary of Requested Information

Based on the NRC Staff's review of LES submittal of additional information on October 14, 2011, "Revised Request for Exception to License Condition 10.f of Materials License SNM-2010," the staff determined that further information was needed to begin a detailed technical review. NRC Letter dated November 9, 2011, "Acceptance Review, Request for Exception to License Condition 10.f of Materials License SNM-2010 – Supplemental Information Needed (Second Request)," delineates the information required.

This attachment provides a summary of that requested information and details how that information is provided in this submittal.

### **NRC Request**

#### **"Request for Exception from Requirements of QAPD Section 21.10, "Inspection"**

Section 2.2.3.4, "Detailed Basis for the Exception," of LES-11-00141-NRC states that "Personnel performing inspections were qualified field or construction personnel" and that "critical attributes during construction were primarily dimensional verifications that did not require highly specialized training."

- (i) Provide a matrix that identifies the following information: (1) inspection performed; (2) equipment used to perform inspection (tape measure, etc.); (3) identification of personnel who performed the inspection and their affiliation (LES, contractor, etc.); and (4) qualifications of personnel who performed the inspection.
- (ii) In support of item (i)(3) above, provide records of personnel training and qualification to support the assertion that the field and construction engineers were "qualified."

Section 1.4, "Background," of LES-11-00141-NRC states that "Quality control inspections were not performed by trained and qualified Quality Control personnel independent of the work activities; however, inspections were performed by engineering personnel."

Attachment 4 of CALC-C-00183 provides examples of signoffs for QL-1G activities including formwork installation, rebar and anchor bolt installation, etc.

- (i) Provide records of personnel training and/or qualification to support the assertion that the personnel completing signoffs for quality control inspections belonged to the engineering organization or were qualified as engineering personnel."

### **UUSA Response**

#### **QAPD Section 21.10, "Inspection"**

Section 2.2.3.4, "Detailed Basis for the Exception"

- (i) A summary of the inspections performed and detailed inspection matrix are included in Attachments 2 and 2A that provides:

1. Inspection performed,
  2. Equipment used to perform inspection,
  3. Identification of personnel who performed the inspection and their affiliation, and
  4. Qualifications of personnel who performed the inspection.
- (ii) A summary of the qualifications of the personnel who performed the inspections and detailed records of their qualifications is provided in Attachments 3 and 3A that demonstrates the competency of these field and construction engineers.

#### Section 1.4, "Background"

- (i) A summary of the qualifications of the personnel who performed the QC inspections and detailed records of their qualifications is provided in Attachments 3 and 3A that demonstrates the competency of these engineering personnel.

#### **NRC Request**

##### *Request for Exception from Requirements of QAPD Section 21.13, "Handling, Storage, and Shipping"*

##### *Exception Request Section 2.1.3.4, Detailed Basis for the Exception*

- (i) *Provide linkage to the section of CALC-C-00183, Revision 0 that documents the verification and acceptance of the post-storage condition of the installed reinforcing steel prior to every concrete placement.*
- (ii) *Provide a copy of the Cylinder Receipt and Dispatch Building Project Quality Assurance Plan.*

#### **UUSA Response**

##### QAPD Section 21.13, "Handling, Storage and Shipping"

##### Section 2.1.3.4, "Detailed Basis for the Exception"

- (i) The post-storage condition of the installed reinforcing steel prior to concrete placement would have been encompassed by the signoffs for the "Reinforcing Steel" item of the post pour checklist. This inspection point is addressed in detail in Attachment 2 page 4, and the appropriate signoffs are noted in Attachment 2A. For pours utilizing construction joints involving previously embedded rebar, the cleanliness of the rebar was verified on the Critical Attributes checklist that precedes each concrete placement report (an example of this is Page 809 of Attachment 4 to CALC-C-00183).
- (ii) A copy of the Cylinder Receipt and Dispatch Building (CRDB) Project Quality Assurance Plan (PQAP) is provided in Attachment 4.

**NRC Request****Request for Exception from Requirements of QAPD Section 21.17, "Quality Assurance Records"**

- (1) *Exception Request Section 2.1.4.3, What Was Done that Requires the Exception?*
- (i) *Provide Reference No. 3 of CALC-C-00183, Revision 0 Section 6.0, Specification LES-S-S-00002, Revision 3, "CRDB Civil-Structural Requirements."*
  - (ii) *Provide Reference No. 26 of CALC-C-00183, Revision 0 Section 6.0, Contract Number LES-SC-1051, Revision 0, dated 5-16-08, "Procurement and Construction of Civil-Structure Scope for the Cylinder Receiving and Dispatch Building (CRDB), Building 1100, Requisition Number 28683-REQ-08-968."*
- (2) *Exception Request Section 2.1.4.4, Detailed Basis for the Exception*
- (i) *Provide linkage to the section of CALC-C-00183, Revision 0 that captures copies of all design documents (drawings and specifications) mentioned in Section 2.1.1.4. Also provide a copy of all these design documents.*

**UUSA Response****QAPD Section 21.17, "Quality Assurance Records"**

- (1) Section 2.1.4.3, "What Was Done that Requires the Exception"
- (i) A copy of LES Specification, LES-S-00002, Revision 3, "CRDB Civil- Structural Requirements" is provided in Attachment 5.
  - (ii) A copy of LES Contract, LES-SC-1051, Revision 0, dated 05-16-08, "Procurement and Construction of Civil-Structure Scope for the Cylinder Receiving and Dispatch Building (CRDB), Building 1100, Requisition Number 28683-REQ-08-968" is provided in Attachment 6.
- (2) Section 2.1.4.4, "Detailed Basis for the Exception"
- (i) Section 6.0 of CALC-C-00183, Revision 0, identifies all design documents (drawings, calculations and specifications). Copies of all the design documents are provided in Attachment 7.

**NRC Request****Request for Exception from Requirements of QAPD Section 21.4, "Procurement Document Control"*****(1) Exception Report Section 2.2.1.4 Detailed Basis for the Exception***

- (i) Provide linkage to the section of CALC-C-00183, Revision 0 that captures copies of records; a review of which was used to determine that no procurement hold points would have been required.*

**UUSA Response****QAPD Section 21.4, "Procurement Documents"*****(1) Section 2.2.1.4, "Detailed Basis for the Exception"***

- (i) A Procurement Hold Point Evaluation including references and copies of additional records which were used for UUSA's determination that procurement hold points would not have been required is provided in Attachments 8 and 8A.*

**NRC Request****Request for Exception from Requirements of QAPD Section 21.18, "Audits"**

*Section 2.2.4.4, "Detailed Basis for the Exception," of LES-11-00141-NRC states that "LES procedures were used to conduct QL-2/QL-3 audits and assessments. In addition, verifications of material characteristics were performed as part of applying the additional methods described in CALC-C-00183."*

- (1) Evidence of verification of material characteristics is included in CALC-C-00183; however, reference has not been made to the QL-2/QL-3 audits and assessments.*
- (i) Provide linkage to the section(s) of CALC-C-00183, Revision 0 that capture copies of records related to the QL-2/QL-3 audits and assessments, or provide such records separately.*

**UUSA Response****QAPD Section 21.18, "Audits"*****Section 2.2.4.4, "Detailed Basis for the Exception"***

- (1)(i) A summary of the audit records and relevant records are provided in Attachments 9 and 9A.*



## ENCLOSURE 2

### Affidavit

I, Jay Laughlin, Chief Nuclear Officer and Head of Technical Services of Louisiana Energy Services, LLC (LES) at the URENCO USA Facility, make the following representations that to the best of my knowledge and belief:

1. LES wishes to have withheld from public disclosure the following documents in Enclosure 1:

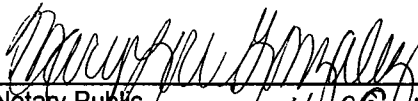
Attachment	Title
3A	Personnel Qualification Records
4A	CRDB PQAP LES-SC-1051-SUB-0001A-01
5A	CRDB Specification LES-S-S-00002-3
6A	CRDB Construction Contract LES-SC-1051
7A	Calculation AN-ARC-711
7B	Calculation AN-ARC-816
7C	Calculation AN-ARC-820
7D	CRDB Design Drawing Set
8A	CRDB Hold Point Documentation LES-S-S-03313

2. The information contained in the documents cited in 1 above for which exemption from public disclosure is requested is either company business proprietary data or personal information. LES requests that this information be exempt from disclosure pursuant to the provisions in 10 CFR Part 2.390(a)(4) and (a)(6), respectively.
3. Public disclosure of the information in the above enclosure to this submittal has the potential to result in substantial harm to the competitive position of LES, provide valuable business information to competitors of LES which they could duplicate without having to expend their own resources to develop, and reduce or foreclose the availability of profit opportunities.
4. The information stated in this affidavit has been submitted in accordance with the applicable parts of 10 CFR 2.390 and the guidance contained in NUREG-1556, Vol. 20, Appendix C.4.

  
Jay Laughlin  
11-22-11  
Date

Chief Nuclear Officer and Head of Technical Services  
Louisiana Energy Services, LLC

I certify the above named person appeared before me and executed this document on this 22nd day of November, 2011.

  
Notary Public  
My commission expires: 4-26-2015



OFFICIAL SEAL  
MARY LOU GONZALEZ  
NOTARY PUBLIC  
STATE OF NEW MEXICO  
My Commission Expires 4-26-2015