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LES-14-00137-NRC



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ATTN: Document Control Director, 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: UBC Storage Pad Crane Authorization

URENCO USA (UUSA) has completed the installation of equipment, and initiating processes and controls necessary for operation of the Uranium Byproduct Cylinder (UBC) Storage Pad Crane.

Two ISA Summary Accident Sequences will be applicable upon operation of this new crane; sequence identifiers are FF44-2 (Fire), and EXTERNAL EVENTS (EE) (Seismic, Tornado/ High Wind, Snow/Ice, and Local Intense Precipitation). Both accident sequences, if unmitigated or not prevented, would result in high consequences to the worker and to the public, thus IROFS are required. The new IROFS required to be implemented in this area are engineered IROFS35, IROFS35a, and IROFS27e.

Accident sequences FF44-2 and EE are identified as applicable to the UBC Storage Pad Crane. The safety controls applied to prevent the consequences associated with this accident sequence are mitigative IROFS35, IROFS35a, and preventative IROFS27e. IROFS35 and IROFS35a are passive engineered IROFS. IROFS35 provides a controlled event where a fire would not propagate onto the UBC Storage Pad due to a fire wall between the crane power transformer and UBC Storage Pad. IROFS35a states the transformer oil utilized will limit fire intensity to ensure heat load is less than that required for cylinder rupture. IROFS27e is a passive engineered IROFS that is implemented by designing the crane to withstand the effects of seismic, tornado, high wind, snow load, and local intense precipitation, consistent with the assumptions in the bases for the consequence calculations.

UUSA respectfully requests authorization to place the UBC Storage Pad Crane in service at NRC's earliest convenience. Upon achieving operation of the UBC Storage Pad Crane, UUSA will be able to become more efficient in our cylinder storage capabilities.

Should there be any questions concerning this submittal, please contact Amy Johnson, UUSA Licensing and Performance Assessment Manager, at 575-394-6203.

Respectfully

✔ay Laughlin Chief Nuclear Officer and Head of Operations

## CC:

Randall Musser Chief, Construction Inspection Branch 3 USNRC, Region II 245 Peachtree Center Ave, NE Suite 1200 Atlanta, GA 30303-1257

Mike G. Raddatz Project Manager U.S. Nuclear Regulatory Commission Three White Flint North Mailstop: 13A12M Washington, DC 20555-0001

Jimi Yerokun Deputy Director, Division of Construction Inspection USNRC, Region II 245 Peachtree Center Ave, NE Suite 1200 Atlanta, GA 30303-1257

James Hickey Chief, Fuel Facility Inspection Branch 2 USNRC, Region II 245 Peachtree Center Ave, NE Suite 1200 Atlanta, GA 30303-1257 Carolyn Evans Deputy Director, Division of Fuel Facility Inspection USNRC, Region II 245 Peachtree Center Ave, NE Suite 1200 Atlanta, GA 30303-1257

William Jones Director, Division of Construction Projects USNRC, Region II 245 Peachtree Center Ave, NE Suite 1200 Atlanta, GA 30303-1257

Mark Lesser Director, Division of Fuel Facility Inspection US NRC, Region II 245 Peachtree Center Ave, NE Suite 1200 Atlanta, GA 30303-1257

Brian W. Smith Chief, Enrichment and Conversion Branch U.S. Nuclear Regulatory Commission Three White Flint North Mailstop: 13A12M Washington, DC 20555-0001