

JAN 25 2016

LES-16-00015-NRC

ATTN: Document Control Desk  
U.S. Nuclear Regulatory Commission  
Division of Facilities and Security  
11555 Rockville Pike  
Rockville, MD 20852

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

Subject: Response to UUSA 10 CFR 25.33 Exemption Request

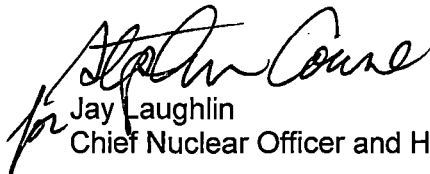
Reference: 1) NRC Letter from M Raddatz to A Johnson: URENCO USA Request for Exemption from 10 CFR 25.33 Requirements (dated December 10, 2015)  
2) UUSA letter LES-15-000198-NRC UUSA Request for Exemption from 10CFR25.33 Requirements (dated November 11, 2015)

Pursuant to Reference 1, Louisiana Energy Services (LES), dba URENCO USA (UUSA) hereby submits additional information to the request for an exemption to 10 CFR 25.33. Reference 2 did not include the detailed explanation of "Other Undue Hardship" in 10 CFR 25.11(b)3. Reference 1 requested these details missing from Reference 2 be addressed in an additional correspondence.

Enclosure 1 contains proprietary and commercial information. In accordance with 10 CFR 2.390(a)(4), UUSA requests that Enclosure 1 be withheld from public disclosure. Enclosure 2, Affidavit, supports this request.

Should there be any questions concerning this submittal, please contact Mr. Rick Medina, Acting Licensing and Performance Assessment Manager at 575-394-5846.

Respectfully,

  
Jay Faughlin  
Chief Nuclear Officer and Head of Operations

Enclosure: 1) 10CFR25.11(b)3 Details  
2) Affidavit

NM5501

cc:

Valerie B. Kerben  
Chief, Personnel Security Branch  
Division of Facilities and Security  
Office of Administration  
U.S. Nuclear Regulatory Commission  
Three White Flint North  
Mailstop: 3B46  
11555 Rockville Pike  
Rockville, MD 20852

J. Keith Everly, Senior Program Manager  
U.S. Nuclear Regulatory Commission  
Three White Flint North  
Mail Stop O-2D-15  
11555 Rockville Pike  
Rockville, MD 20852

Mike G. Raddatz, Senior Project Manager  
U.S. Nuclear Regulatory Commission  
Mail Stop T-4A60  
11545 Rockville Pike  
Rockville, MD 20852

Marvin Sykes, Chief - Fuel Facility Branch 1  
U.S. Nuclear Regulatory Commission  
245 Peachtree Center Ave, NE  
Suite 1200  
Atlanta, GA 30303-1257

ENCLOSURE 2

Affidavit

I, Jay Laughlin, Chief Nuclear Officer and Head of Operations of Louisiana Energy Services, LLC (dba "UUSA") at the URENCO USA (UUSA) Facility; 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:

1. UUSA wishes to have withheld from public disclosure the following document:  
Enclosure 1: 10 CFR 25.11(b)3 Details
2. The information contained in 1 above for which exemption from public disclosure is requested is security in confidence. UUSA requests that this information be exempt from disclosure pursuant to the provisions in 10 CFR Part 2.390(b).
3. Public disclosure of the information cited in 1 above has the potential to result in substantial harm to the competitive position of UUSA, provide valuable business information to competitors of UUSA 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 sought to be withheld is not available in public sources, to the best of UUSA's knowledge and belief.
5. 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  
Jay Laughlin

1-25-16  
Date

Chief Nuclear Officer and Head of Operations  
URENCO USA

I certify the above named person appeared before me and executed this document on this 25th day of January, 2016.

Melva G. Ramos  
Notary Public

My commission expires: 4/3/16

