



March 20, 2017

ACO 17-0021

ATTN: Document Control Desk

Mr. Marc L. Dapas, Director
Office of Nuclear Material Safety and Safeguards
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Ms. Marissa G. Bailey, Director
Division of Security Operations
Office of Nuclear Security and Incident Response
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

American Centrifuge Lead Cascade Facility
Docket Number 70-7003; License Number SNM-7003

American Centrifuge Plant
Docket Number 70-7004; License Number SNM-2011

Submittal of Description of Change and Changed Pages to the Security Program and Transportation Security Plan for the American Centrifuge Plant – Security-Related Information, Official Use Only, and Export Controlled Information

**INFORMATION TRANSMITTED HERewith IS PROTECTED FROM PUBLIC
DISCLOSURE AS CONFIDENTIAL COMMERCIAL OR FINANCIAL INFORMATION
AND/OR TRADE SECRETS PURSUANT TO 10 CFR 2.390 AND 9.17(a)(4)**

AND

**INFORMATION TRANSMITTED HERewith IS PROTECTED FROM
DISCLOSURE PURSUANT TO 10 CFR PART 810**

Dear Mr. Dapas and Ms. Bailey:

Purpose

In accordance with 10 *Code of Federal Regulations* (CFR) 70.32(d) and (e), American Centrifuge Operating, LLC (ACO) hereby submits to the U.S. Nuclear Regulatory Commission (NRC) a description of change to the Security Program for the American Centrifuge Plant (NR-3605-0004) and Transportation Security Plan for Classified Matter Shipments for the American Centrifuge Plant (NR-3605-0010) as Enclosure 1 of this letter.

~~Document transmitted contains~~

~~Security Related Information Withhold Under 10 CFR 2.390~~

~~Official Use Only and Export Controlled Information~~

When separated from Enclosures 2 and 3, this cover letter is uncontrolled.

American Centrifuge Operating, LLC
3930 U.S. Route 23 South – P.O. Box 628
Piketon, OH 45661

NM5520
NSIR08

~~Security-Related Information- Withhold Under 10 CFR 2.390~~
~~Official Use Only and Export Controlled Information~~

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Additionally, in accordance with 10 CFR 95.19(b), ACO hereby submits to the NRC changed pages for the Security Program and Transportation Security Plan as Enclosures 2 and 3, respectively.

Discussion

These changes have been reviewed in accordance with 10 CFR 70.32 and 10 CFR 95.19 and have been determined not to decrease the effectiveness of the Security Program and to be a non-substantive change.

Enclosures 2 and 3 contain Security-Related Information and, in accordance with the guidance provided by the U.S. Department of Energy (DOE), contain Official Use Only information. Therefore, ACO requests these enclosures be withheld from public disclosure pursuant to 10 CFR 2.390(d)(1). Additionally, Enclosure 2 has been determined, in accordance with the guidance provided by the DOE, to contain Export Controlled Information and must be protected from disclosure per the requirements of 10 CFR Part 810.

Contact

If you have any questions regarding this matter, please contact me at (740) 897-3859.

Sincerely,



Kelly L. Wiehle
Regulatory Manager

Enclosures: As stated

cc (without enclosures, unless otherwise noted):

M. Diaz, NRC HQ	O. Siurano-Perez, NRC HQ
K. Everly, NRC HQ (enclosures)	T. Smith, NRC HQ
Y. Faraz, NRC HQ (enclosures)	A. Snyder, NRC HQ
K. Kirchbaum, NRC Region II	M. Sykes, NRC Region II
L. Pitts, NRC Region II (enclosures)	T. Vukovsky, Region II

Enclosure 1 to ACO 17-0021

**Description of Change to the Security Program and Transportation Security Plan
for the American Centrifuge Plant**

**Information Contained Within
Does Not Contain
Export Controlled Information**

Reviewing

Official: #152

Date: 03/16/2017

Enclosure 1 to ACO 17-0021

Description of Changes to the Security Program and Transportation Security Plan for the American Centrifuge Plant

FCE/PCE Numbers	Rev.	Description/Reason for the Change	Approval Date	Change to SSC?	Documents Modified Due to Change	ISA Summary Update Required?
FCE 16-0082 PCE 16-0010	0 0	<p>Title: Revision to Security Program/Plans to Update Classification Guide Information and Remove Time Requirement for Finalizing Classified Working Papers or Drafts</p> <p>Description of Change: NR-3605-0004, <i>Security Program for the American Centrifuge Plant</i>, and NR-3605-0010, <i>Transportation Security Plan for Classified Matter Shipments for the American Centrifuge Plant</i>, have been revised to capture changes in classification guide references. Additionally, NR-3605-0004, has been revised to remove the time requirement to finalize classified working papers or drafts.</p> <p>Reason for the Change: Classification Guide CG-SS-4, <i>Classification and UCNI Guide for Safeguards and Security Information</i>, has been replaced by two guides: CG-SS-5, <i>Classification and Unclassified Controlled Nuclear Information Guide for Safeguards and Security Information</i>, and CG-MC&A-1, <i>Classification and Unclassified Controlled Nuclear Information Guide for Nuclear Material Control and Accountability</i>. Classification Guide TNP-59, <i>DOE Classification Guide for Gas Centrifuge Information (U)</i>, was added to the latest revision to the Index of DOE Classification Guidance.</p> <p>Additionally, the requirement to finalize classified working papers or drafts no later than 180 days after their creation was a requirement contained within DOE Manual 475.1-1B, <i>Manual for Identifying Classified Information</i>, and NRC guidance document <i>Standard Practice Procedures Plan, Standard Format and Comment Set of Requirements for the Protection of Classified Matter for USEC Inc. and Its Limited Liability Companies Regulated by the U.S. Nuclear Regulatory Commission</i>. During an NRC inspection in August 2016, it was determined that this time requirement no longer exists within the DOE Manual.</p>	10/05/16	No	LCF and ACP Security Program Sections 2.12.3.10, 2.12.3.12, and 2.30; LCF and ACP Transportation Security Plan Sections 2.4 and 3.0	No
FCE 17-0011 PCE 17-0006	0 0	<p>Title: Organizational Structure Changes for the American Centrifuge Lead Cascade Facility</p> <p>Description of Change: Changes are being made to the organizational structure for the American Centrifuge Lead Cascade Facility (Lead Cascade) to re-align with the decommissioning phase of the project.</p> <p>Reason for the Change: Effective January 30, 2017, Centrus announced an organizational change that consisted of aligning the Regulatory Manager to report to the Director, Regulatory. As such, the programmatic oversight for environmental monitoring, waste management, and industrial safety areas are being removed from the License Termination and Decommissioning Support Manager description.</p>	02/21/17	No	LCF License Application – Table of Contents, Sections 2.1.2, 2.1.2.1, 2.1.2.1.5, 2.1.2.1.6, 2.1.6, 2.1.6.1 and Figure 2.1-1; LCF FNMCP Section 3.1; LCF/ACP QAPD Sections 1.2 and Figure 1.1-2; and LCF/ACP Security Program Chapter 2, Figure 2-13	No