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CERTIFIED MAIL
RETURN RECEIPT REQUESTED

21G-17-0081
GOV-01-55-04
ACF-17-0114
April 18, 2017

Ms. Leira Cuadrado, Project Manager
Fuel Manufacturing Branch
Division of Fuel Cycle Safety, Safeguards, and Environmental Review
Office of Nuclear Material Safety and Safeguards
U.S. Nuclear Regulatory Commission
Two White Flint North, 11555 Rockville Pike
Rockville, MD 20852-2738

70-143

**Subject: Response to NRC Second Request for Supplemental Information
Regarding the 2015 Nuclear Fuel Services Response to Generic Letter
2015-01**

- References:
- 1) NRC letter, R. K. Johnson to R. J. Freudenberger, NRC Request For Supplemental Information Concerning Response To Generic Letter 2015-01, dated February 8, 2016
 - 2) NRC letter, K. M. Ramsey to R. J. Freudenberger, NRC Second Request For Supplemental Information Concerning Response to Generic Letter 2015-01, dated December 5, 2016
 - 3) NFS letter, R. J. Freudenberger to K. M. Ramsey, Screening Methodology Used by NFS for Seismic Analysis of Internal Components and Items Relied On For Safety (IROFS), dated February 17, 2017 (21G-17-0059)
 - 4) NFS letter, R. J. Freudenberger to K. M. Ramsey, Supplemental Information Requested by the NRC Regarding the 2015 Nuclear Fuel Services Response to Generic Letter 2015-01, dated June 8, 2016 (21G-16-0092)

Nuclear Fuel Services, Inc. (NFS) is submitting the attached response to the second set of questions received (Reference 2) following the NRC's review of NFS' response to Generic Letter 2015-01. All relevant categories of internal components were analyzed

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Reviewing Official: R. Shackelford /NFS, Inc.
Date: 4/18/17
Guidance Used: CG-55-4

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May be exempt from public release under the Freedom of Information Act (5 U.S.C. 552)
Exemption number 7
Nuclear Regulatory Commission review required before public release.
R. Shackelford /NFS, Inc.
Name and organization of person making determination
Date of Determination 4/18/17

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NM5501

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to determine if they would be degraded or failed as a result of seismic loads associated with a 2% probability of exceedance in 50 years and further evaluated as outlined in the screening methodology in Reference 3. No new accident sequences resulting from a seismic event were identified that resulted in a moderate or high consequence.

Additionally, currently documented accident sequences were reviewed to determine if the credited Items Relied on for Safety (IROFS) would be degraded or failed due to the seismic loads associated with the evaluation basis earthquake. Based on the results documented in Attachment 2 and an internal review of the accident sequences, no changes to the current safety basis were required.

Attachment 1 contains sensitive information, is marked "Official Use Only" in accordance with 5 U.S.C. 552, and is not suitable for public release.

Information contained in the Seismic Evaluation of Equipment for Nuclear Fuel Services Fuel Fabrication Facility (Attachment 2) and the NFS photographs (Attachment 3) include sensitive information and are marked as "Official Use Only" in accordance with 5 U.S.C. 552, and Unclassified Controlled Nuclear Information (as appropriate) in accordance with CG-SS-4, and are not suitable for public release.

Attachments 2 and 3 also contain proprietary information, as set forth in the enclosed affidavit. Therefore, NFS requests that this information be withheld from public disclosure.

If you or your staff have any questions, require additional information, or wish to discuss these questions further, please contact me at (423) 743-1705, or Mr. Nicholas Brown, Nuclear Criticality Safety Unit Manager, at (423) 791-2243. Please reference our unique document identification number (21G-17-0081) in any correspondence concerning this letter.

Sincerely,

NUCLEAR FUEL SERVICES, INC.



Richard Freudenberger
Safety and Safeguards Director

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NWB/pj

Enclosure: Affidavit

Attachment 1: Response to NRC Second Request for Supplemental Information
Regarding the 2015 Nuclear Fuel Services Response to Generic Letter
2015-01

Attachment 2: Seismic Evaluation of Equipment for Nuclear Fuel Services Fuel
Fabrication Facility

Attachment 3: Eight NFS Photographs

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Full copy:

✓ U.S. Nuclear Regulatory Commission
Director, Office of Nuclear Material Safety & Safeguards
Attention: Document Control Desk
Washington, DC 20555

Cover Letter and Attachment 1 only:

Regional Administrator
U.S. Nuclear Regulatory Commission, Region II
245 Peachtree Center Avenue NE, Suite 1200
Atlanta, GA 30303-1257

Mr. Leonard Pitts
Senior Fuel Facility Inspector
U.S. Nuclear Regulatory Commission, Region II
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Atlanta, GA 30303-1257

Mr. Marvin Sykes
Chief, Projects Branch I
Division of Fuel Facility Inspection
U.S. NRC, Region II
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Larry Harris
Senior Resident Inspector
U.S. NRC

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ENCLOSURE

AFFIDAVIT

TRADE SECRETS OR COMMERCIAL INFORMATION

(2 pages to follow)

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AFFIDAVIT

TRADE SECRETS OR COMMERCIAL INFORMATION

I, W. Randy Shackelford, representing the Safety and Safeguards Department at Nuclear Fuel Services, Inc. (NFS), that to the best of my knowledge and beliefs, make the following representation contained herein:

- A. The following documents which Nuclear Fuel Services, Inc. (NFS) wishes to have withheld from public disclosure are Attachment 2 and Attachment 3 to NFS letter (21G-17-0081), dated April 18, 2017:

**Seismic Evaluation of Equipment for
Nuclear Fuel Services Fuel Fabrication Facility
and
Eight NFS Photographs**

- B. The information contained in the document cited in A above has been held in confidence by Nuclear Fuel Services, Inc. (NFS), or its Contractor, in that it contains trade secrets or commercial information as specified in Title 10, Code of Federal Regulations, Part 2.390(a). The basis for requesting that this document(s) be withheld from public disclosure is explicitly marked on the cover page to each of the aforementioned documents and/or the top of each affected page in accordance with 10 CFR 2.390(b)(i)(B).
- C. The information contained in the document cited in A above is the intellectual property of Nuclear Fuel Services, Inc. (NFS), or its Contractor, and as such is customarily held in confidence by Nuclear Fuel Services, Inc. (NFS). As such, Nuclear Fuel Services, Inc. (NFS) has customarily submitted privileged and confidential information of this type to the Nuclear Regulatory Commission (NRC) and to its predecessor, the Atomic Energy Commission (AEC), in confidence.
- D. The information contained in the document cited in A above has not been made available to public sources by Nuclear Fuel Services, Inc. (NFS), nor has Nuclear Fuel Services, Inc. (NFS) authorized that it be made available. In accordance with Nuclear Fuel Services, Inc. (NFS) policies governing the protection and control of information, proprietary information contained herein has been made available, on a limited basis, to others outside NFS only as required and under suitable agreement providing for nondisclosure and limited use of the information.

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- E. The public disclosure of the information contained in the document cited in A above is likely to cause substantial economic harm to the competitive advantage held by Nuclear Fuel Services, Inc. (NFS), or its Contractor. The basis for withholding said information is that it contains distinguishing aspects of a process, methodology, or component(s), the exclusive use of which provides a competitive advantage for NFS or its Contractor in product optimization or marketability.

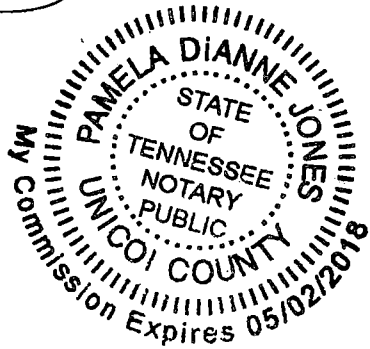
- F. The proprietary information that Nuclear Fuel Services, Inc. (NFS) requests to be withheld from public disclosure is contained in the entire document as so marked.

W. Randy Shackelford 4/18/2017
W. Randy Shackelford Date
Nuclear Safety and Licensing Manager

I certify the above named person appeared before me and executed this document on this the 18 day of April, 2017.

[Signature]
Notary Public

My commission expires:
5-2-18



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Attachment 1

Response to NRC Second Request for Supplemental Information
Regarding the 2015 Nuclear Fuel Services Response to
Generic Letter 2015-01

(8 pages to follow)

<p>OFFICIAL USE ONLY</p> <p>May be exempt from public release under the Freedom of Information Act (5 U.S.C. 552)</p> <p>Exemption number <u>7</u></p> <p>Nuclear Regulatory Commission review required before public release.</p> <p><u>D. Shackelford</u> /NFS, Inc.</p> <p>Name and organization of person making determination</p> <p>Date of Determination <u>4/18/2017</u></p>

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Attachment 2

Seismic Evaluation of Equipment for
Nuclear Fuel Services Fuel Fabrication Facility

(154 pages to follow)

NOTE: This document contains UCNi information in the Supplement (Attachment 3).

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Reviewing Official: R. Shackelford /NFS, Inc.

Date: 4/18/2017

Guidance Used: CG-SS-A

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Exemption number 7

Nuclear Regulatory Commission review required before
public release

R. Shackelford /NFS, Inc.

Name and organization of person making determination

Date of Determination 4/18/2017

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Attachment 3

Eight NFS Photographs

(8 pages to follow)

The attached photographs and all information contained herein are the property of Nuclear Fuel Services, Inc. and shall not be used or disclosed for any purpose other than that for which it has been furnished without the express written consent of NFS.

<p>UNCLASSIFIED CONTROLLED NUCLEAR INFORMATION NOT FOR PUBLIC DISSEMINATION</p> <p>Unauthorized dissemination subject to civil and criminal sanctions under Section 148 of the Atomic Energy Act of 1954, as amended (42 U.S.C. 2168).</p> <p>Reviewing Official: <u>R. Shackelford</u> /NFS, Inc. Date: <u>4/18/2017</u> Guidance Used: <u>CG-SS-4</u></p>

<p>OFFICIAL USE ONLY</p> <p>May be exempt from public release under the Freedom of Information Act (5 U.S.C. 552)</p> <p>Exemption number <u>7</u></p> <p>Nuclear Regulatory Commission review required before public release. <u>R. Shackelford</u> /NFS, Inc.</p> <p>Name and organization of person making determination Date of Determination <u>4/18/2017</u></p>

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