

JUL 11 2017

~~Proprietary Information – Withhold under 10 CFR 2.390~~

LES-17-00036-NRC

Attn: Document Control Desk
Director
Office of Nuclear Material Safety and Safeguards
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

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

Subject: License Amendment Request to Change License Basis Documents and Materials License to remove the requirement for a Criticality Accident Alarm System in Product Outdoor Cylinder Storage Areas (LAR-17-02)

In accordance with 10 CFR 70.34, Amendment of Licenses, URENCO USA (UUSA) herewith requests an amendment to Materials License SNM-2010 to incorporate an exemption proposed per 10 CFR 70.17, Specific Exemptions (Enclosure 1). This submittal requests an exemption from the requirements stated in 10 CFR 70.24, Criticality Accident Requirements for criticality alarms located in Outdoor Cylinder Storage Areas. The License Basis Documents which reference the proposed amendment to the Materials License include the following.

- 1) Integrated Safety Analysis Summary (ISA Summary) – Changes reflect the addition of CAAS exemption for Outdoor Cylinder Storage Areas.
- 2) Safety Analysis Report (SAR) – Changes reflect the addition of CAAS exemption for Outdoor Cylinder Storage Areas.
- 3) Emergency Plan – Changes reflect the addition of CAAS exemption for Outdoor Cylinder Storage Areas.

Additional details are provided in Enclosure 1 in the form of an Introduction (Purpose and Background), Proposed Changes, and Technical Basis for the Proposed Changes. In addition, Enclosure 1 provides the section changes to the LBD's with current wording and proposed wording. Enclosure 1 contains proprietary information, and should be withheld from release to the public in accordance with 10 CFR 2.390. An affidavit supporting this request is provided in Enclosure 2.

Should there be any questions regarding this request, please contact Wyatt Padgett, UUSA Manager of Licensing and Performance Assessment, at 575.394.5257.

Respectfully,



Stephen Cowne
Compliance Manager and Chief Nuclear Officer

NM5520
NM58

Enclosures: 1. License Amendment Request (LAR-17-02), Background, Proposed Changes, and Technical Analysis of Proposed Changes
2. Affidavit

cc:

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ENCLOSURE 2
AFFIDAVIT

I, Stephen Cowne, Chief Nuclear Officer and Compliance Manager, URENCO USA, 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:
 - Enclosure 1 – License Amendment Request (LAR-17-02), Background, Proposed Changes, and Technical Analysis of Proposed Changes
2. The information contained in the documents cited in 1 above for which exemption from public disclosure is requested is proprietary information related to commercial aspects of the URENCO USA Facility. LES requests that this information be exempt from disclosure pursuant to the provisions in 10 CFR Part 2.390(a)(4).
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.
5. The information sought to be withheld in public sources, to the best of LES' knowledge and belief.

Stephen Cowne 7/11/2017
Date
Stephen Cowne
Chief Nuclear Officer and Compliance Manager
Louisiana Energy Services, LLC
URENCO USA

I certify the above named person appeared before me and executed this document on this 12th day of July 2017.

Jessica Taylor
Notary Public
My commission expires: 4/18/2021

