

Attn: Document Control Desk Director, Division of Fuel Cycle Safety Office of Nuclear Material Safety and Safeguards U.S. Nuclear Regulatory Commission Washington, DC 20555-0001

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

Subject: Response to Comments Regarding the CMS and PCTS-ETS ISSP and Classified Network POAM

**References:** 

 Letter from J Zimmerman to W Padgett providing an IATO and requiring an updated CMS and PCTS-ETS ISSP and an updated POAM for Classified Systems dated April 26, 2018 (LES-18-047-NRC).

Pursuant to Louisiana Energy Services (LES), dba URENCO USA (UUSA) classified network accreditation, UUSA herewith submits a response to the comments contained in Reference 1.

Reference 1 provided authorization to continue to operate UUSAs classified networks until July 27, 2018. It also notified UUSA of several comments that must be addressed in the PCTS-ETS Information Systems Security Plan (ISSP) and Revision 0 of the Plan of Actions and Milestones (POAM) for Classified Systems. The comments are to be addressed in order for the NRC to authorize operation of UUSAs classified networks for an additional three years and to approve LAR 17-02.

Enclosures 1 through 4 contain Security-Related Information and disclosure to the public could present security vulnerability. UUSA requests that these enclosures be withheld from public disclosure in accordance with 10 CFR 2.390(d)(1). The Enclosure 5 affidavit supports this withholding request.

UUSA appreciates the efforts of the NRC staff to complete the review of this response in time to authorize continued operation of the UUSA's classified networks. Should there be any questions, please contact Wyatt Padgett, Licensing and Performance Assessment Manager, at 575.394.5257.

Respectfully,

BUNV

Stephen Cowne Chief Nuclear Officer and Compliance Manager

Enclosures:

- Response to Comments on the CMS and PCTS-ETS ISSP and the POAM for Classified Systems
- 2. PCTS and ETS SPPP Revision 4 markup version for LAR 17-02
- 3. PCTS and ETS SPPP Revision 4 clean version for LAR 17-02
- 4. POAM for Classified Systems Revision 1 for Three Year ATO
- 5. Affidavit

NM.5522

LES-18-074-NRC

cc:

J. Keith Everly, Senior Program Manager U.S. Nuclear Regulatory Commission JKeith.Everly@NRC.gov

Karl Sturzebecher, Project Manager - UUSA U.S. Nuclear Regulatory Commission Karl.Sturzebecher@NRC.gov

## Enclosure 5 Affidavit

I, Stephen Cowne, being duly sworn, state that I am the Chief Nuclear Officer and Compliance Manager for Louisiana Energy Services (LES), dba URENCO USA (UUSA). 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. LES wishes to have withheld from public disclosure the following documents:
  - LES-18-074-NRC Enclosure 1 Response to Comments on the CMS and PCTS-ETS ISSP and the POAM for Classified Systems
  - LES-18-074-NRC Enclosure 2 PCTS and ETS SPPP Revision 4 markup version for LAR 17-02
  - LES-18-074-NRC Enclosure 3 PCTS and ETS SPPP Revision 4 clean version for LAR 17-02
  - LES-18-074-NRC Enclosure 4 POAM for Classified Systems Revision 1 for Three Year ATO
- The information contained in the documents cited in 1 above for which exemption from public disclosure is requested concern classified matter protection. UUSA requests that this information be exempt from disclosure pursuant to the provisions in 10 CFR Part 2.390(d)(1).
- 3. The information sought to be withheld is not available in public sources, to the best of UUSA's knowledge and belief.
- 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.

Stephen Cowne Date Chief Nuclear Officer and Compliance Manager Louisiana Energy Services, LLC

I certify the above named person appeared before me and executed this document on this <u>22</u> day of <u>June</u> 2018.

Notary Public My commission expires: <u>4/18/2021</u>

