

SEP 13 2018

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

References: Nuclear Criticality Safety Validation Report, MONK 8A Validation and Verification

Subject: LAR 18-04 Addition of MCNP6 for Nuclear Criticality Safety Analysis

Pursuant to the requirements of SNM-2010 License Condition 25, License Condition 30, and in accordance with 10 CFR 70.34, URENCO USA (UUSA) hereby requests an addition to the existing Nuclear Criticality Safety Validation Report and an amendment to the UUSA Safety Analysis Report (SAR).

The proposed change in this License Amendment Request (LAR) is to implement the MCNP6 (version 1.0) as an additional computer code for criticality applications at UUSA. The existing licensed criticality code for performing various nuclear criticality safety analyses (NCSA) is MONK8A.

UUSA considers the information provided in Enclosures 1, 2, 3, and 4 of this license amendment as proprietary and requests that the information be withheld from public disclosure in accordance with 10 CFR § 2.390(a)(4). Enclosure 5 provides an affidavit supporting this request.

Enclosure 1 provides a description, technical analysis, basis, and safety significance of the proposed change. Enclosure 2 provides applicable portions of the License Basis Documents proposed to be revised with the changes annotated on each page. Enclosures 3 and 4 provide the Nuclear Criticality Safety Validation and Verification Report(s) for the proposed methodology.

UUSA appreciates the efforts of the NRC staff in supporting the review and approval of this important amendment in a timely manner. Should there be any questions concerning this submittal please contact Wyatt Padgett, Licensing and Performance Assessment Manager, at 575-394-5257.

Respectfully,



Stephen Cowne
Chief Nuclear Officer and Compliance Manager

- Enclosures:
- 1) Description of Proposed Changes (LAR-18-04)
 - 2) Markup Pages to Safety Analysis Report
 - 3) URENCO USA (UUSA) MCNP6 Validation, NCS-REP-002-00
 - 4) URENCO USA (UUSA) MCNP6 Verification, NCS-REP-003-00
 - 5) Affidavit

NM5520

LES-18-089-NRC

Cc:

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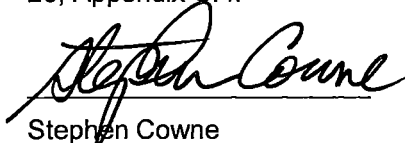
Robert Williams, Chief – Region II, Projects Branch I
U.S. Nuclear Regulatory Commission
Robert.Williams@NRC.gov

Withhold from Public Disclosure Under 10 CFR 2.390

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); 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:

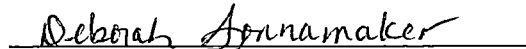
1. LES wishes to have withheld from public disclosure the following document:
 - Enclosure 1 Description of Proposed Changes (LAR-18-04)
 - Enclosure 2 Markups to Licensing Basis Documents
 - Enclosure 3 URENCO USA (UUSA) MCNP6 Validation, NCS-REP-002-00
 - Enclosure 4 URENCO USA (UUSA) MCNP6 Verification, NCS-REP-003-00
2. The information contained in the document 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.



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

9/13/18
Date

I certify the above named person appeared before me and executed this document on this 13 day of September, 2018.



Notary Public
My commission expires: 2-28-19

