

JAN 10 2019

LES-19-002-NRC

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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: Integrated Safety Analysis Summary Annual Update

In accordance with 10 CFR 70.72(d)(3), Louisiana Energy Services, LLC ("LES"), also dba URENCO USA ("UUSA") herewith submits the Integrated Safety Analysis Summary Annual Update which incorporates changes made during the 2018 calendar year.

Enclosure 1 contains the marked up pages to the Integrated Safety Analysis Summary, revisions 29 and 29a. A description of each change is provided in the revision history. Revision bars, strikethroughs and underlines were utilized.

It is requested that information contained in Enclosure 1 of this letter be withheld from public disclosure pursuant to 10 CFR 2.390(a)(4) in that it contains proprietary information. Accordingly, and responsive to the requirements of 10 CFR 2.390(b)(1), an affidavit requesting withholding of this information is provided in Enclosure 2.

Should there be any questions regarding this submittal, please contact Rick Medina, Acting Licensing and Performance Assessment Manager, at 575-394-5846.

Respectfully,



Stephen Cowne  
Chief Nuclear Officer and Compliance Manager

Enclosures: 1) Marked up pages of the Integrated Safety Analysis Summary  
2) Affidavit

NMSS20

cc: via email

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**Enclosure 1**  
**Marked up pages of the Integrated Safety Analysis Summary**  
(Revision bars, strikethroughs and underlines utilized)

**Enclosure 2  
AFFIDAVIT**

I, Stephen Cowne, Chief Nuclear Officer and Compliance Manager at the URENCO USA Facility, make the following representations that to the best of my knowledge and belief:

1. LES wishes to have withheld from public disclosure the following document:  
Enclosure 1 - Marked up pages of the Integrated Safety Analysis Summary
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.
5. The information sought to be withheld is not available in public sources, to the best of LES' knowledge and belief.

Stephen Cowne      1/10/19  
\_\_\_\_\_  
Stephen Cowne      Date  
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 10<sup>th</sup> day of January 2019.

Verónica Romero  
\_\_\_\_\_  
Notary Public  
My commission expires: June 16, 2020

 OFFICIAL SEAL  
**Verónica Romero**  
NOTARY PUBLIC  
STATE OF NEW MEXICO  
My Commission Expires 6/16/2020