



Nuclear Fuel Services, Inc.

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21G-19-0005
GOV-01-55-04
ACF-19-0004
January 24, 2019

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

- References: 1) Docket No. 70-143; SNM-124
 2) Letter from R. J. Freudenberger to NRC, Revisions to Classified Integrated Safety Analysis Summaries for Calendar Year 2018 (21Y-19-0001), dated January 23, 2019

Subject: Revisions to Unclassified Integrated Safety Analysis Summaries for Calendar Year 2018

In accordance with Title 10, Code of Federal Regulations, Part 70.72(d)(3), and SNM-124, Section 3.1.4, paragraph 3, Nuclear Fuel Services, Inc. (NFS), hereby submits revisions to the subject Integrated Safety Analysis (ISA) Summaries that reflect changes implemented in Calendar Year 2018. Changes are denoted by vertical lines in the right margin of affected pages and are summarized in the Record of Revision of the affected ISA Summary. Additional *classified* ISA Summaries are being submitted under separate cover letter (Reference 2). A review of the changes incorporated in the Calendar Year 2018 submittal was performed, and none of the changes implemented in the summaries were associated with licensing actions processed since the NFS license (SNM-124) was renewed in 2012.

Information contained in the attached ISA Summaries includes sensitive information and is marked as "Official Use Only" in accordance with 5 U.S.C. 552, and is not suitable for public release.

OFFICIAL USE ONLY
May be exempt from public release under the Freedom of Information Act (5 U.S.C. 552)
Exemption number <u>7</u>
Nuclear Regulatory Commission review required before public release.
<u>R. Shadelford</u> / NFS, Inc.
Name and organization of person making determination
Date of Determination <u>1/21/19</u>

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The ISA Summaries for the following buildings have not changed and are, therefore, not included in this submittal:

- **Building 300 Warehouse**
- **Building 100 NDA Laboratory**
- **Laboratories 110A, 110B, 110D, and 131**

The CD Line summary has been merged with the BPF summary since remaining equipment supports BPF processing. The CD Line summary is now obsolete.

Decommissioning of the BLEU Complex is complete and the Oxide Conversion/Effluent Processing Buildings and the Uranyl Nitrate Building summaries are now considered obsolete.

The documents and drawings enclosed herewith are being submitted to the NRC for docketing in the NFS Erwin License Docket (Reference 1). Said enclosures contain NFS proprietary information, as set forth in the enclosed affidavit in accordance with 10 CFR 2.390(a)(4).

The drawings enclosed herewith have the following statement affixed:

"This drawing and all information contained herein is 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."

Notwithstanding the language of this restriction, NFS acknowledges that reproduction and controlled distribution of submitted documents, in accordance with NRC regulations and requirements, is necessary in order for the NRC to carry out its legal and regulatory responsibilities. Further, NFS acknowledges that reproduction and controlled distribution of these drawings by a third party authorized by the NRC is allowable by this language. Therefore, it is NFS' position that the enclosed drawings may be reproduced and distributed in a controlled manner, by a third party authorized by the NRC, for NRC's purposes and use without violation of the statement above.

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If you or your staff have any questions, require additional information, or wish to discuss this further, please contact me at (423) 743-1705, or Mr. Robert Maurer, ISA and Fire Protection Manager, at (423) 735-5583. Please reference our unique document identification number (21G-19-0005) in any correspondence concerning this letter.

Sincerely,

NUCLEAR FUEL SERVICES, INC.



Richard J. Freudenberger, Director
Safety and Safeguards

/pdj

Enclosure: Affidavit

Attachment: **Revisions to Unclassified Integrated Safety Analysis Summaries for Calendar Year 2018:**

BPF ISA Summary, Rev 16, (21T-19-0013)

NFS Site ISA Summary, Rev 16, (21T-19-0014)

Building 310 Warehouse ISA Summary, Revision 10, (21T-19-0012)

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ENCLOSURE

AFFIDAVIT
TRADE SECRETS OR COMMERCIAL INFORMATION

(2 pages)

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AFFIDAVIT

TRADE SECRETS OR COMMERCIAL INFORMATION

I, Richard J. Freudenberger, 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 document which Nuclear Fuel Services, Inc. (NFS) wishes to have withheld from public disclosure is the Attachment to NFS letter (21G-19-0005), dated January 24, 2019:

Revisions to Unclassified Integrated Safety Analysis Summaries for Calendar Year 2018:

BPF ISA Summary, Rev 16, (21T-19-0013)
NFS Site ISA Summary, Rev 16, (21T-19-0014)
Building 310 Warehouse ISA Summary, Revision 10, (21T-19-0012)

- 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.
- 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

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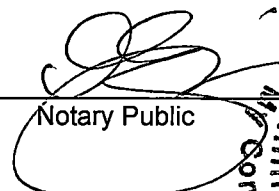
held by Nuclear Fuel Services, Inc. (NFS), or its Contractor. The basis for withholding said information is that it contains distinguishing aspects of a process, methodology, or component(s), the exclusive use of which provides a competitive advantage for NFS or its Contractor in product optimization or marketability.

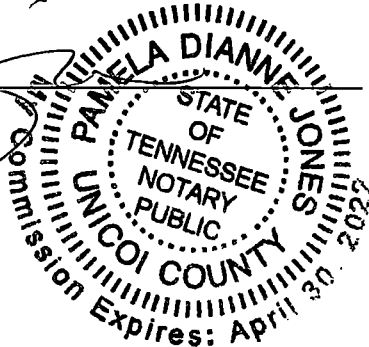
- F. The proprietary information that Nuclear Fuel Services, Inc. (NFS) requests to be withheld from public disclosure is contained in the entire document as so marked.


Richard J. Freudenberger
Safety and Safeguards Director

1/24/19
Date

I certify the above named person appeared before me and executed this document on this the 24 day of January, 2019.


Notary Public



My commission expires:
4-30-22

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ATTACHMENT

Revisions to Unclassified Integrated Safety Analysis Summaries
For Calendar Year 2018:

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NFS Site ISA Summary, Rev 16
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