

FEB 12 2019

Karl Sturzebecher  
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: Resubmission of Executed Financial Assurance Instruments for  
Decommissioning

References:

1. Email from K Sturzebecher to R Medina, dated 1/9/2019, requesting resubmission of two enclosures in URENCO USA's December 2018 Financial Assurance Submission (IN-19-006-NRC)
2. Letter from R Shaffer to NMSS, dated 12/14/2018, providing the executed financial assurance instruments for decommissioning (LES-18-166-NRC)

Pursuant to Reference 1, Louisiana Energy Services, LLC, dba URENCO USA (UUSA) herewith provides response to the request to resubmit Enclosures 1 and 4 of Reference 2.

- Regarding Reference 2, Enclosure 1 - The Zurich Surety Bond Rider for the specified amount, dated June 23, 2016 was the most recent. The specified amount was not changed for 2017 and 2018, therefore a new rider was not issued. Enclosure 1 provides an original of the verification certificate certifying the current amount of the bond.
- Regarding Reference 2, Enclosure 4 – The Certification of Financial Assurance submitted in Reference 2 contained the corporate seal but was missing the date. Enclosure 2 contains an original Certification of Financial Assurance with the corporate seal and date.

The enclosures contain proprietary information in accordance with 10 CFR 2.390(a)(4). UUSA requests that Enclosures 1 and 2 be withheld from public disclosure. The Enclosure 3 Affidavit supports this withholding request.

Should there be questions concerning 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. Original Verification Certificate for Indefinite Term Surety Bond
2. Original Certification of Financial Assurance
3. Affidavit

LES-19-023-NRC

cc:

Karl Sturzebecher, Project Manager  
U.S. Nuclear Regulatory Commission  
[Karl.Sturzebecher@nrc.gov](mailto:Karl.Sturzebecher@nrc.gov)

Jacob Zimmerman, Branch Chief – Fuel Facility Licensing Branch  
U.S. Nuclear Regulatory Commission  
[Jacob.Zimmerman@nrc.gov](mailto:Jacob.Zimmerman@nrc.gov)

**Enclosure 3  
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 documents:
  - Enclosure 1: Original of Verification Certificate for Indefinite Term Surety Bond
  - Enclosure 2: Original Certification of Financial Assurance
2. The information contained in this correspondence and enclosures is proprietary information related to commercial and financial aspects of the URENCO USA Facility, including the business strategy of LES. 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 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  
URENCO USA Facility

  
\_\_\_\_\_  
Date

I certify the above named person appeared before me and executed this document on this 12<sup>th</sup> day of February, 2019.

  
\_\_\_\_\_  
Notary Public  
My commission expires: June 11<sup>th</sup> 2020



OFFICIAL SEAL  
**Verónica Romero**  
NOTARY PUBLIC  
STATE OF NEW MEXICO  
My Commission Expires 6/11/2020