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Attn: Document Control Desk
Director, Office of Nuclear Material Safety & Safeguards
U.S. Nuclear Regulatory Commission
Washington, DC 20555-001

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

Subject: Request to Postpone Initiation of Decommissioning of the UUSA Centrifuge Assembly Building (CAB)

References: 1) NRC Regulatory Issue Summary 2015-19, Revision 1, "Decommissioning Timeliness Rule Implementation and Associated Regulatory Relief"
2) NUREG-1757, Volume 3, Revision 1, "Consolidated Decommissioning Guidance: Financial Assurance, Record Keeping, and Timeliness, Final Report"
3) 10 CFR 70.38, "Expiration and Termination of Licenses and Decommissioning of Sites and Separate Buildings or Outdoor Areas"

Pursuant to the NRC's Decommissioning "Timeliness Rule" (Refs. 1-3), Louisiana Energy Services (LES), dba URENCO USA (UUSA), herewith requests that initiation of decommissioning of UUSA's Centrifuge Assembly Building (CAB) be postponed per the criteria of 10 CFR 70.38(f). Enclosure 1 provides supplementary information to support this request, in accordance with the corresponding NRC guidance in Ref. 2.

The CAB has been used over its operating history to assemble centrifuges before being moved into the Separations Building Modules (SBMs) and installed in the cascades. The major functional areas of the CAB have included: 1) Centrifuge Component Storage Area; 2) Centrifuge Assembly Area; 3) Assembled Centrifuge Storage Area; 4) Centrifuge Test Facility (CTF); 5) Centrifuge Post Mortem Facility (PMF); and 6) Centrifuge Travel Path. Source material and Special Nuclear Material (SNM) have been used for equipment testing in the CTF within the CAB.

Should there be any 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

Enclosure: 1) Information to Support a Postponement in the Initiation of Decommissioning for UUSA's Centrifuge Assembly Building (CAB) in Accordance with NUREG-1757, Volume 3, Section 2.6.1

NM5520

LES-19-024-NRC

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ENCLOSURE 1

Information to Support a Postponement in the Initiation of Decommissioning for UUSA's Centrifuge Assembly Building (CAB) in Accordance with NUREG-1757, Volume 3, Section 2.6.1

- **"The date that principal activities ceased at the separate building"**

Principal activities at UUSA's Centrifuge Assembly Building (CAB) ceased on October 1, 2018.

- **"The date a request for an extension of the time period is required"**

Notification to the NRC that no principal activities have occurred in the CAB for a period of 24 months would be required by no later than October 1, 2020, per the requirements of 10 CFR 70.38(d)(4). Per 10 CFR 70.38(f), a request to delay or postpone initiation of the decommissioning process would be due to the NRC no later than 30 days before the above notification, i.e., no later than September 1, 2020.

- **"The length of postponement requested"**

UUSA requests that the postponement of initiating decommissioning of the CAB be extended until the time of final UUSA site decommissioning at termination of licensed activities.

- **"Whether a Decommissioning Plan (DP) will be required for the site"**

UUSA anticipates that an overall Decommissioning Plan will ultimately be required for the UUSA site, but will not be required for the CAB at this early stage.

- **"The reason for requesting an extension of the time period for initiation of the decommissioning schedule"**

UUSA is requesting an extension of the time period for initiation of decommissioning following cessation of the principal activities at the CAB. The CAB will need to remain intact to support possible future operation. The background on this request is as follows:

Due to a consistent downward trend in the market prices for enriched uranium, URENCO initiated a campaign in 2016 to slow the rate of facility expansion, maximize cost savings and minimize operating costs. In February 2017, a decision was made to suspend the fabrication and installation of centrifuges at the URENCO USA facility; and Cascade 4 in Assay Unit 1006 would be the last cascade commissioned during the planned suspension. Over the next year, plans were developed and implemented that would place the CAB in an idle state by year-end 2018.

During the planned suspension, all classified material in the CAB has been removed¹ and returned to Enrichment Technology Company (ETC) in Europe or stored in secured locations in Assay Unit 1006. All special nuclear material was removed from the CAB in early 2018. Some specialty tools and equipment will also be returned to ETC in Europe; however, a majority of the centrifuge fabrication equipment will remain in the CAB until such time as machine fabrication and installation restarts.

¹ Letter from J. Zimmerman (NRC) to UUSA, "Approval of UUSA License Amendment Request 18-02, Removal of the ETUS Standard Practice Procedure Plan and Deletion of License Condition 10.I," dated February 7, 2019 (IN-19-016-NRC).

Utilities to the CAB such as HVAC, compressed air, lighting, security systems, and life safety elements will continue to remain on and maintained (see below).

- **“A demonstration that the facility will not significantly deteriorate during a standby period. Facilities should be sufficiently maintained such that they may become operational without excessive repairs and decommissioning is not significantly more complex at a later date”**

The CAB will be sufficiently maintained during the period of standby that the facility is not expected to significantly deteriorate. Most of the preventative maintenance functions (PMs) for the CAB will continue. UUSA will still need to maintain compressed air, life safety, and HVAC to most of the CAB in order to preserve the centrifuge fabrication equipment. However, UUSA will reduce the amount of PMs to certain systems due to the fact that operations in the CAB will be suspended.

Compressors 3U1 and 4U1 are currently in operation. Once the CAB is declassified and shut down, UUSA will switch to compressors 1U1 and 2U1 to maintain compressed air to the CAB. Compressed air must be maintained for the ETUS equipment. The CAB Alpha and HF monitors will be maintained until the CAB is closed. These PMs can be removed once the CAB contaminated equipment is removed. Plans are to continue with security system components for the foreseeable future. All Roll-Up doors are to be closed and locked. Maintenance items for these doors can be discontinued. Decommissioning of the CAB is not expected to be significantly more complex at a later initiation date.

- **“A discussion of the current decommissioning cost estimate and the potential for increased decommissioning costs if an extension of the time period is approved”**

UUSA’s current annual decommissioning cost estimate has been submitted to the NRC² and approved³. No factors are anticipated that would increase decommissioning costs for the CAB over the period of standby.

- **“Evidence of adequate financial assurance for the ultimate decommissioning of the site”**

UUSA currently provides financial assurance for the ultimate decommissioning of the site, including the CAB⁴.

- **“A discussion (1) of the extent and nature of contamination and the potential for migration by airborne or ground water pathways and (2) of the plan for monitoring and maintaining the separate building during the extension period. The plan should be sufficiently detailed to demonstrate that public and worker health and safety and the environment will not be negatively affected during the extension period”**

² Letter from S. Cowne (UUSA) to the NRC, “Annual Decommissioning Cost Estimate and Proposed Financial Assurance Instruments,” dated June 27, 2017 (LES-17-00079-NRC).

³ Letter from the NRC to W. Padgett (UUSA), “Louisiana Energy Services Updated Decommissioning Funding Plan Cost Estimate Request Cost Activity Code L34402”, dated January 9, 2018 (IN-18-00005-NRC).

⁴ Letter from S. Cowne (UUSA) to the NRC, “URENCO USA Updated Financial Assurance Instruments for Decommissioning,” dated December 13, 2017 (LES-17-00155-NRC).

During operation, the principal functions of the Centrifuge Post Mortem Facility (PMF) within the CAB were to: 1) facilitate dismantling of non-contaminated centrifuges or contaminated centrifuges using equipment and processes that minimize the potential to contaminate personnel or adjacent facilities; and 2) prepare potentially contaminated components and materials for transfer to the CRDB prior to disposal.

Centrifuges were brought into the facility on a specially designed transport cart. The facility was also equipped with radiological monitoring equipment including a portable frisker used to detect surface contamination.

The Centrifuge Test and Post Mortem Facilities (CTF/PMF) Exhaust Filtration System routed potentially contaminated exhaust gases from centrifuge test and post mortem activities through a filter system prior to exhausting through a roof mounted vent stack to the atmosphere. It also ensured the CTF/PMF was maintained at a negative pressure with respect to adjacent areas during contaminated or potentially contaminated processes. The stack, located on the CAB roof, contained continuous monitors to indicate radioactivity levels. The CTF/PMF Exhaust Filtration System was monitored from the Control Room. Operations that require the CTF/PMF Exhaust Filtration System to be functional are no longer performed if the system is shut down.

The UUSA Radiation Protection Program has been applied to all facets of the activities that involve radioactive material use since the CTF/PMF began operations. Weekly radiation and contamination surveys were required to be performed in the CTF/PMF. No surface contamination has ever been identified in the CTF/PMF. In addition, a continuous air monitor with alarm capability was in operation for the duration of active operations in that area. The air samples were analyzed by proportional counter by UUSA Radiation Protection staff. No airborne activity has ever been indicated.

After all the radioactive material has been removed from the CTF/PMF, the UUSA Radiation Protection staff plans to conduct unconditional release surveys, as is required by procedure, for all equipment being removed from the CTF/PMF. A subsequent survey plan for the unconditional release survey will be undertaken after all items are removed from the facility that are not permanently installed.

The potential for migration by airborne or groundwater pathways is insignificant as supported by historical survey documentation and the removal of radioactive material from the building.