

MAY 20 2019

Urenco

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: Semi-Annual Safety Analysis Report (SAR) Update

In accordance with Materials License SNM-2010, Condition 30, Louisiana Energy Services (LES), dba URENCO USA (UUSA) herewith submits the Safety Analysis Report (SAR) for the semi-annual period November 2018 through May, 2019, changes made under UUSA's authority.

Enclosure 1 contains the marked up pages to the Safety Analysis Report for revision 45. A description of each change is provided in the revision history. Revision bars, strikethroughs and underlines were utilized.

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

Respectfully,



Stephen Cowne  
Chief Nuclear Officer and Compliance Manager

Enclosure: 1) Marked up pages of the Safety Analysis Report.

NM552D

LES-19-083-NRC

CC: via email

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

Leonard Pitts Chief – Region II Projects Branch I Acting  
U.S. Nuclear Regulatory Commission  
[Leonard.Pitts@NRC.gov](mailto:Leonard.Pitts@NRC.gov)

Jacob Zimmerman, Branch Chief - Enrichment and Conversion Branch  
U. S. Nuclear Regulatory Commission  
[Jacob.Zimmerman@nrc.gov](mailto:Jacob.Zimmerman@nrc.gov)

**Enclosure 1**

**Marked up pages of the Safety Analysis Report**  
(revision bars, strikethroughs and underlines utilized)

# **SAFETY ANALYSIS REPORT**

## **Revision 45**

Table of Contents

Summary of Changes Rev 45		
Issue / Date	Change	Description of Change
Rev 45	LBDCR-18-0009	Eliminates accident sequence FF44-1 and associated IROFS36g controls based on laws of physics CC-EG-2016-0057      70.72 – 2018-0008
	LBDCR-19-001	Org. Change, to add new CEO to the SAR and SPPP
	LBDCR-19-008	Update SAR Figure 7.5-1, Fire Loop – AC 140855

## 1.2 Institutional Information

---

### 1.2 Institutional Information

This section addresses the details of the applicant's corporate identity and location, applicant's ownership organization and financial information, type, quarterly, and form of licensed material to be used at the facility, and the type(s) of license(s) being applied for.

#### 1.2.1 Corporate Identity

##### 1.2.1.1 Licensee

The Licensee's name, address, and principal office are as follows:

Louisiana Energy Services, L.L.C.  
P.O. Box 1789  
275 Highway 176  
Eunice, NM 88231

##### 1.2.1.2 Organization and Management of Applicant

Louisiana Energy Services (LES), L.L.C. is a Delaware limited liability company. It has been formed solely to provide uranium enrichment services for commercial nuclear power plants. LES has one, 100% owned subsidiary, operating as a limited liability company, formed for the purpose of purchasing Industrial Revenue Bonds and no divisions. The ownership of LES is as follows:

1. URENCO Investments, Inc. (UII) (a Delaware corporation and wholly-owned subsidiary of URENCO Limited, a corporation formed under the laws of the of England ("URENCO") and owned in equal shares by Enrichment Investments Limited ("EIL"), Uranit UK Limited ("Uranit"), both companies formed under English law, and Ultra-Centrifuge Nederland NV ("UCN"), a company formed under Dutch law. EIL is ultimately wholly-owned by the government of the United Kingdom; UCN is ultimately wholly-owned by the government of the Netherlands; Uranit is ultimately owned by Eon Kenkraft GmbH (50%) and RWE Power Ag (50%), companies formed under the laws of the Federal Republic of Germany). UII holds 96% (as of December 31, 2010) of the membership units and has 100% of the voting power.
2. URENCO Deelnemingen B.V. (a Netherlands corporation and wholly-owned subsidiary of URENCO USA Inc. The ownership of URENCO USA Inc. is explicitly described above. URENCO Deelnemingen B.V. holds 4% of the membership units (as of December 31, 2010) and has 0% of the voting power.

The President of LES is ~~Karen Fili~~ ~~David E. Sexton~~. The President reports to the Board of Managers. The Board of Managers are:

- ~~Mr. David E. Sexton~~ ~~Karen Fili~~  
President, Chief Executive Officer  
Louisiana Energy Services, LLC  
275 Hwy 176  
Eunice, NM 88231

LBD CR-  
19-001

## 1.2 Institutional Information

---

~~Mr. Sexton~~ Mrs. Fili is a citizen of the United States of America

LBDCR-  
19-001

- Dr. Thomas Haeberle  
Chief Executive Officer  
URENCO Court  
Stoke Poges, United Kingdom

Dr. Haeberle is a citizen of Germany

- Ms. Melissa Mann  
Executive Director, Strategy and Government Affairs  
URENCO Court  
Stoke Poges, United Kingdom

Ms. Mann is a citizen of the United States of America

The Chief Nuclear Officer is the primary regulatory contact and is responsible for the safe operation of the URENCO USA Facility. LES' principal location for business is Eunice, New Mexico. The facility will be located in Lea County near Eunice, New Mexico. No other companies will be present or operating on the URENCO USA site other than services specifically contracted by LES.

Foreign Ownership, Control and Influence (FOCI) of LES is addressed in the URENCO USA Standard Practice Procedures for the Protection of Classified Matter, Appendix 1 – FOCI Package. The NRC in their letter dated, March 24, 2003, has stated "...that while the mere presence of foreign ownership would not preclude grant of the application, any foreign relationship must be examined to determine whether it is inimical to the common defense and security [of the United States]". (NRC, 2003) The FOCI Package mentioned above, and amendments thereto, provide sufficient information for this examination to be conducted.

### 1.2.1.3 Address of the Enrichment Plant and Legal Site Description

The URENCO USA site is physically located approximately 8 km (5 mi) east of Eunice, New Mexico adjacent to New Mexico Highway 234 in Lea County. The legal description is as follows:

A PARCEL OF LAND WITHIN SECTION 32, TOWNSHIP 21 SOUTH, RANGE 38 EAST, NEW MEXICO PRINCIPAL MERIDIAN, LEA COUNTY, NEW MEXICO,

BEGINNING at the one-quarter corner between Sections 31 and 32, (a found GLO brass cap on a 2-in iron pipe);

THENCE N00°38'22"W along the section line between Sections 31 and 32 a distance of 2638.37 feet to the corner of Sections 29, 32, 31 and 30, (a found GLO brass cap on a 2-in iron pipe);

THENCE N89°18'08"E along the section line between Sections 29 and 32 a distance of 2640.69 feet to a set 5/8-in rebar with a 2-in aluminum cap marked "MUTH PLS 13239";

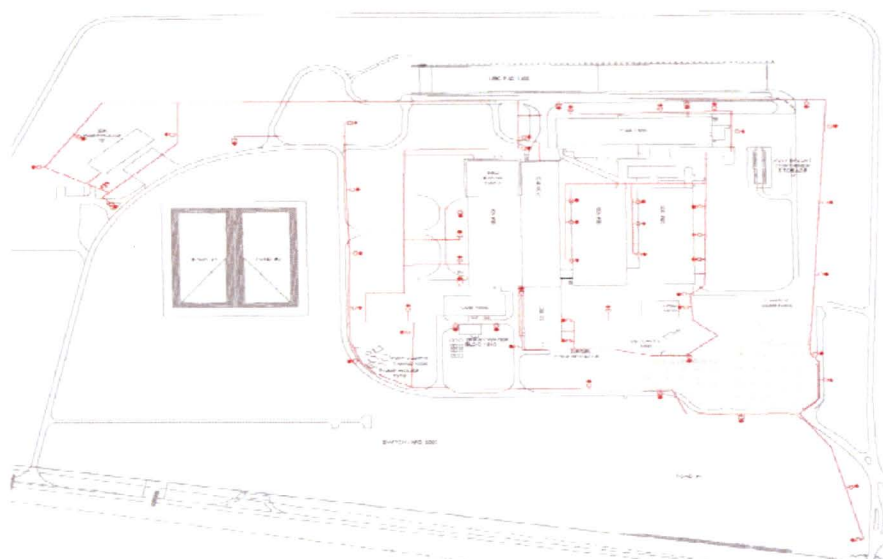
### 3.6 Chapter 3 Tables

IROFS	Monitoring Support Equipment	Other Equipment	Equipment Attributes	Operated Support Equipment	Other Equipment	Equipment Attributes
IROFS36e IROFS36f	None	UBC Storage Pad Slope	Slope of the Pad to prevent excess pooling	None	None	None
	None	Topographical survey equipment	Accurate and reliable topography reading	None	None	None
IROFS36g	None	None	None	None	Landscape Equipment	None  LBDCR-18-0009
IROFS39a	None	None	None	None	None	None
IROFS39b	None	None	None	None	None	None
IROFS39c	None	None	None	None	None	None
IROFS39d	None	None	None	None	None	None
IROFS42	Weigh Scale System including local digital readout from weighing system at cylinder station Product Station Weighing Scale System including local digital readout from weighing system at the product stations *(Notes 2 and 3)	None	Accurate and reliable indication	None	None	None
IROFS46	None	None	None	None	None	None
IROFS50a	None	None	None	None	Barriers	Visible and substantial
IROFS50b	None	None	None	None	Barriers	Visible and substantial
IROFS50c	None	None	None	None	Barriers	Visible and substantial



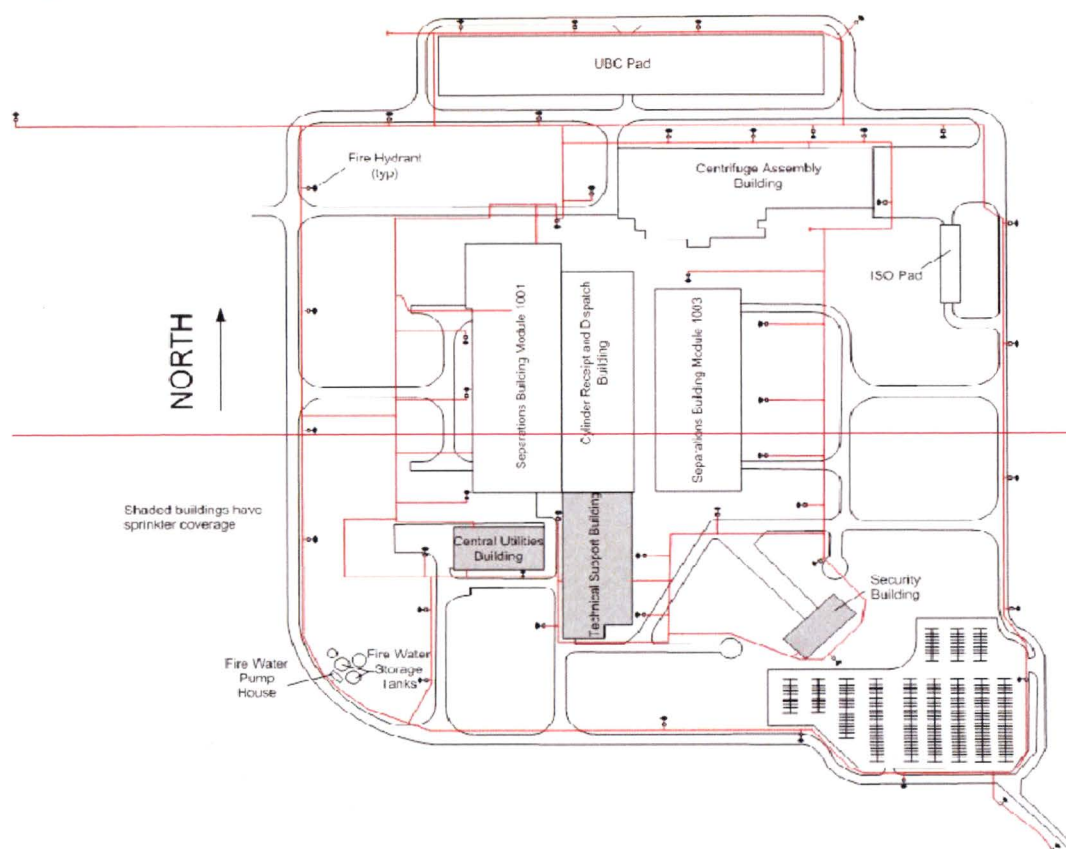
## 7.7 Chapter 7 Figures

---



LBDCR-  
19-008

## 7.7 Chapter 7 Figures



LBDCR-  
19-008

Figure 7.5-1 Exterior Fire Protection System Overall Site Plan Sheet 1 of 2