LES-19-175-NRC DEC 1 2 2019

ATTN: Document Control Desk 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: URENCO USA Executed Financial Assurance Instruments for Decommissioning

- References: 1. Louisiana Energy Services, LLC, Materials License SNM-2010
 - 2. Letter from UUSA to NMSS providing the decommissioning funding cost estimate for 2019, dated 10/14/2019 (LES-19-140-NRC)

Pursuant to Reference 1, License Condition 16c and 16d, Louisiana Energy Services, LLC, dba URENCO USA (UUSA) herewith provides the executed financial assurance instruments.

In Reference 2, UUSA provided the decommissioning cost estimate. The enclosed financial assurance instruments reflect the total dollar amount described in that estimate.

The enclosures contain proprietary information in accordance with 10 CFR 2.390(a)(4). UUSA requests that Enclosures 1 through 4 be withheld from public disclosure. The Enclosure 5 Affidavit supports this withholding request.

Should there be any questions concerning this submittal, please contact Wyatt Padgett, UUSA Licensing and Performance Assessment Manager, at (575) 394-5257.

Respectfully,

Nin 1 when R. Cowne

Stephen R. Cowne Chief Nuclear Officer and Compliance Manager

Enclosures:

- 1. Zurich Surety Bond Rider
- 2. Amendment 11 to the Standby Trust Agreement
- 3. Amendment 2 to the HSBC Letter of Credit
- 4. Certification of Financial Assurance
- 5. Affidavit

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LES-19-175-NRC

CC:

Kevin Ramsey, Project Manager - UUSA U.S. Nuclear Regulatory Commission Kevin.Ramsey@nrc.gov

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Enclosure 5 AFFIDAVIT

I. Stephen Cowne, Chief Nuclear Officer and Compliance Manager for Louisiana Energy Services, LLC (LES) 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 documents:
 - Enclosures 1 through 4 to LES-175-NRC URENCO USA Executed e Financial Assurance Instruments for Decommissioning
- 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

I certify the above named person appeared before me and executed this document on this \mathbb{R}^{th} day of December, 2019.

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